



Hills of Gold Wind Farm Pty Ltd



Developed by Clean Energy
Partners Pty Limited

Development Management by:



Hills of Gold Wind Farm

Submissions Report

20 December 2021

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Hills of Gold Wind Farm

Submissions Report



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Acronyms and Abbreviations

Name	Description
AGL	Above Ground Level
AHD	Australian Height Datum
AHIMS	Aboriginal Heritage Information Management System
AIA	Aviation Impact Assessment
ANZEC	Australian and New Zealand Environment Council
APZ	Asset Protection Zone
BAM	Biodiversity Assessment Method
BCS	Biodiversity, Conservation and Science Directorate
BESS	Battery energy storage system
BDAR	Biodiversity Development Assessment Report
BHGNR	Ben Halls Gap Nature Reserve
BoM	Bureau of Meteorology
CASA	Civil Aviation Safety Authority
CEF	Community Enhancement Fund
CCC	Community Consultative Committee
CPNP	Crawney Pass National Park
DECC	Department of Environment and Climate Change
DPIE	NSW Department of Planning, Industry and Environment
EMI	Electromagnetic Interference
EIS	Environmental Impact Statement
EP&A Act	Environmental Planning and Assessment Act 1979
EPA	NSW Environment Protection Authority
EPBC Act	Environment Protection and Biodiversity Conservation Act 1999
EPL	Environmental Protection Licence
ERM	Environmental Resources Management Australia Pty Ltd
ESCP	Erosion and Sediment Control Plan
GIS	Geographic Information System
HNSW	Heritage NSW
km	Kilometre
kV	Kilovolt
LGA	Local Government Area

Name	Description
m	metres
MW	Megawatt
MWh	Megawatt hour
NP&W Act	National Parks and Wildlife Act 1974
NPWS	National Parks and Wildlife Service
NRAR	Natural Resources Access Regulator
NSW	New South Wales
NTBMG	Nundle Business and Tourism Marketing Group
O&M	Operations and Maintenance
OSOM	Over Size Over Mass
PAD	Potential Archaeological Deposit
PCTs	Plant community type
POEO Act	Protection of the Environment Operations Act 1997
RFS	NSW Rural Fire Service
RMS	Roads and Maritime Services (formerly the Roads and Transport Authority)
RTS	Response to Submissions
SAIL	Serious and Irreversible Impacts
SEARs	Secretary's Environmental Assessment and Requirements
SEPP	State Environmental Planning Policy
SSD	State Significant Development
TfNSW	Transport for NSW
ULSC	Upper Lachlan Shire Council
VPA	Voluntary Planning Agreement
WEP	Wind Energy Partners
WTG	Wind turbine generators

EXECUTIVE SUMMARY

Hills of Gold Wind Farm Pty Ltd (the 'Proponent') is proposing to construct and operate the Hills of Gold Wind Farm (the 'Project') and associated ancillary infrastructure, located on the ridge line between Hanging Rock and Crawney Pass in the Northern Tablelands region of New South Wales (NSW).

Approval for the Project is sought under the State Significant Development (SSD) provisions (Division 4.7) of Part 4 of the Environmental Planning and Assessment Act 1979 (EP&A Act) as the Project is declared to be SSD under State Environmental Planning Policy (State and Regional Development) 2011.

An Environmental Impact Statement (EIS) (ERM, 2020) was prepared for the Project in accordance with the requirements of the Environmental Planning and Assessment Regulation 2000. The EIS was publicly exhibited between 2 December 2020 and 29 January 2021 by the NSW Department of Planning, Industry and Environment (DPIE).

A total of 624 submissions on the Project were received (excluding duplicates and one submission from "Department of Transport" about the abolition of Roads and Maritime Services as a separate legal entity). These submissions were received from Government agencies, organisations and members of the public broken down as follows:

- 592 public submissions;
- 11 organisation submissions; and
- 21 public authority submissions.

Additional comments were received from DPIE, Upper Hunter Shire Council and NSW Rural Fire Service post exhibition.

The 592 public submissions were received from residents across 70 NSW LGAs and 9 interstate LGAs. A slight majority (319, or 53.9%) of public submissions were received from residents of the Tamworth Regional LGA, which is one of the three LGAs which the Project Area is situated within. Of these, 43.2% support the Project, an unusually high number of active support. A total of 43.3% of submissions were received from LGAs not hosting wind turbine infrastructure.

Public submissions received from residents in the other two LGAs which the Project Area is situated within were significantly less, with a total of 17 (2.8%) submissions received from Upper Hunter LGA, and 3 (<1%) submissions received from Liverpool Plains LGA.

The Project received more supportive submissions than any other wind farm in NSW has to date, with 204 submissions in support received. Of these, the majority came from host communities in and around Nundle and Hanging Rock who provided a total of 122 supporting submissions for the Project. These numbers demonstrate the strong support for the Project in the local community.

It is common for projects of this nature that of the total submissions received a significant majority are objections. Evidence for this includes the most recently approved wind farm in NSW that received greater than 50 public submissions, Rye Park (Mod 1), itself received 84% objections from total public submissions. This is common and does not indicate majority objections in the local community more broadly. Hills of Gold Wind Farm, by contrast, received just 65% objections from total public submissions. The percentage of objections from outside of local LGA's hosting wind farm infrastructure was 49%.

Submissions in support of the Project cited the socio-economic benefits of the Project, including job creation and capital expenditure in the local and regional area, alignment with government strategy for renewable energy targets and transition from fossil fuel to renewable energy; and proposed environmental controls and mitigations, including biodiversity offsets as being key to their support. Objectors to the Project typically cited concerns relating to biodiversity, traffic and transport, visual, site suitability, noise, soil and water, heritage and socio-economic impacts.

This Submissions Report has been prepared to respond to the issues raised in the agency advice and submissions as requested by the DPIE on 11 February 2021 in accordance with clause 82(2) of the Environmental Planning and Assessment Regulation 2000 (NSW); and in accordance with the State Significant Development Guidelines – Preparing a Submission Report, Appendix C to the State Significant Development Guidelines (DPIE, 2021).

All responses and additional technical assessments have been completed by the same study team that prepared the EIS and Amendment Report, with additional technical specialists to address specific matters.

Since the completion of the EIS, and receipt of agency and community submissions during its public exhibition, and based on additional engagement with agencies and the community, a number of key changes have been made to the Project to further reduce the impacts of the Project. As detailed in the Amendment Report, the amendments made to the Project will materially reduce or avoid adverse impacts of the Project, including by:

- *reducing the Development Footprint by approximately 41% from 513 ha to 300 ha with a corresponding reduction in biodiversity impacts;*
- *reducing the native vegetation which is required to be removed to accommodate the development footprint by approximately 36% to 132.43 ha. This represents a total reduction of 75 ha from the Project as described and assessed in the EIS;*
- *further reducing the extent to which the Project will impact on koala habitat by 28%;*
- *avoiding potentially serious and irreversible impacts and/or significant impacts to cave dwelling microbats;*
- *reducing the visual and aviation night lighting impacts of the Project;*
- *reducing the traffic and heritage impacts of the Project; and*
- *preserving access to local goods and services within Nundle and reducing the impacts of Project traffic on residential dwellings within Nundle by the proposed inclusion of a temporary dedicated works vehicle car park in Nundle to reduce traffic congestion at local and tourist features and amenities, and proposed pedestrian crossing, subject to agreement with Tamworth Regional Council.*

In addition, the Amendment Report and this Submissions Report also update the mitigation measures proposed for the Project to ensure that all remaining impacts of the Project are appropriately managed and mitigated throughout the life cycle of the Project.

While there are some inevitable impacts associated with all wind farm projects, the impacts associated with the refined and amended Project have been fully assessed and confirmed to be significantly outweighed by the strong public benefits which the Project will deliver. These include:

- *generating enough renewable energy to power approximately 182,000 typical homes on an average day. The Project will provide a significant amount of the new generation capacity which will be required when the 2,000 MW Liddell Power Station located in the NSW Hunter Valley closes in early 2023. Accordingly, the Project will help ensure the security of electricity supply for NSW and help manage the cost of electricity for consumers;*
- *providing dispatchable energy through the proposed large-scale battery energy storage system of approximately 100MW/400MWh helping to meet peak electricity demands;*

- *saving 608,000 tonnes carbon emissions per annum and assisting the NSW and Federal Government to meet greenhouse gas targets. In particular, the Federal Government has recently committed to achieving net zero greenhouse gas emissions by 2050. If approved, the Project could be constructed and operational well before the critical global milestone of 2030, assisting NSW and Australia to achieve the 35% reduction by 2030 which is regarded by many as the minimum necessary to contain global warming;*
- *enabling effective utilisation of the best wind energy resource in the NSW Hunter/New England region;*
- *material direct investment within the domestic economy with the Project representing a capital investment of at least \$332 million and an ongoing operational investment of \$17 million per annum. This direct investment in NSW and the broader region will also bring material benefits to the Tamworth Local Government Area (LGA) and align with the Tamworth Regional Blueprint 100;*
- *material employment generation, with the creation of 615 Full Time Equivalent (FTE) jobs through both years of the construction period, and 76 FTE jobs during the operational phase (across professional, scientific and technical industry sector) including 16 ongoing site based jobs for the life time of the project;*
- *providing a diversified income stream for rural landholders and neighbours through payments to host landholders and the Neighbour Benefit Sharing Program. The number of rural landowners who will benefit from landowner royalties is currently 25 (10 wind farm and 15 neighbour agreements);*
- *community enhancement funding of \$3,000 per turbine per annum for the operational life of the project, as well as an additional construction sponsorship fund of \$150,000 to support community initiatives during construction; and*
- *contributing to NSW and Commonwealth renewable energy targets, without depending on the network expansion proposed in the New England area and in alignment with the NSW Electricity Roadmap NSW Electricity Roadmap.*

In addition, to further support the local community, if the Project is approved and constructed, ENGIE's energy retailer will offer an exclusive electricity plan to the residents within the Nundle, Hanging Rock and Crawney area. Under this exclusive electricity plan, ENGIE will cover the wholesale cost component of all electricity used by residents within the Nundle, Hanging Rock & Crawney area, enabling them to further benefit from the proximity of the Project by saving on their energy bills.

Overall, it is considered that this Project is consistent with the objectives of the EP&A Act and is strongly in the public interest.

1 INTRODUCTION

1.1 The Project

Hills of Gold Wind Farm Pty Ltd (the 'Proponent') is proposing to construct and operate the Hills of Gold Wind Farm (the 'Project') and associated ancillary infrastructure, located on the ridge line between Hanging Rock and Crawney Pass in the Northern Tablelands region of New South Wales (NSW). A plan of the Project in its regional context is provided in Figure 1-1.

Approval for the Project is sought under the State Significant Development (SSD) provisions (Division 4.7) of Part 4 of the EP&A Act as the Project is declared to be SSD under the *State Environmental Planning Policy (State and Regional Development) 2011*.

In support of the SSD application, an Environmental Impact Statement (EIS) (ERM, 2020) was prepared for the Project in accordance with the requirements of the *Environmental Planning and Assessment Regulation 2000*. The EIS was publicly exhibited between 2 December 2020 and 29 January 2021 by the NSW Department of Planning Industry and Environment (DPIE).

During the public exhibition period, 624 submissions were received from members of the public, community organisations and government agencies (excluding duplicates and one submission from "Department of Transport" about the abolition of Roads and Maritime Services). Further, additional comments were received from DPIE and through further consultation with agencies and community groups.

On the 11 February 2021, DPIE requested that Hills of Gold Wind Farm Pty Ltd prepare and submit a Submissions Report which responds to the issues raised in agency advice and submissions.

This Submissions Report has been prepared to respond to the issues raised in the agency advice and submissions as requested by the DPIE on 11 February 2021 in accordance with clause 82(2) of the Environmental Planning and Assessment Regulation 2000 (NSW).

The Submissions Report also provides further details of on-going stakeholder engagement activities that have been undertaken since the EIS was submitted to DPIE in November 2020, including both agency and community engagement activities.

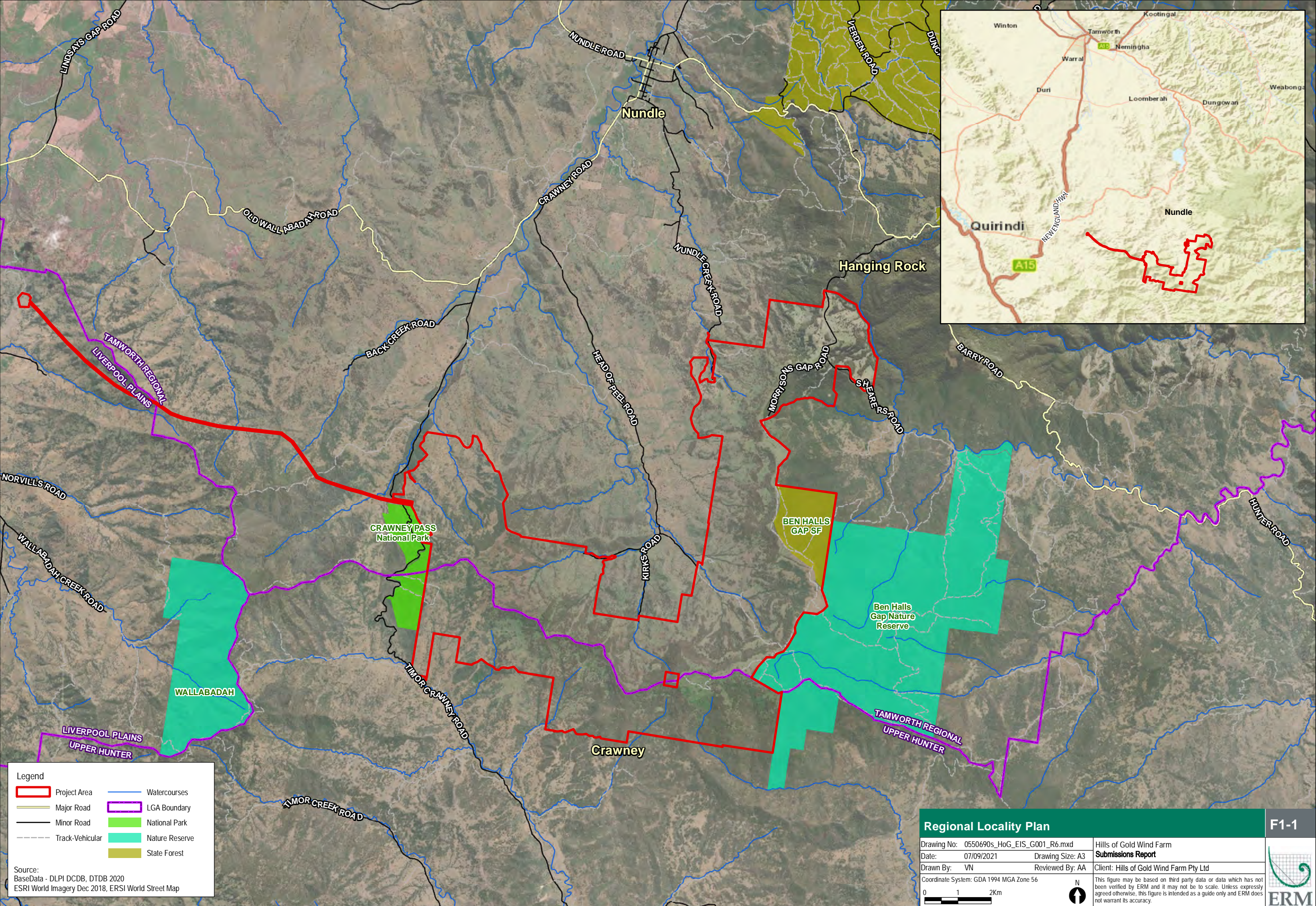
Following receipt of this Submissions Report, DPIE will complete its assessment of the Project and prepare an assessment report, taking into consideration the EIS, the Submissions Report and associated additional assessments, as well as submissions made during the public exhibition period. DPIE's assessment report will be considered by the Independent Planning Commission prior to the determination of the development application.

An Amendment Report has been prepared to outline the refinements and amendments made to the Project to further reduce impacts following exhibition of the EIS in response to agency and community comments during the exhibition period and subsequent engagement and as part of the ongoing assessment and detailed design of the Project. This Submissions Report responds to submissions received based on the exhibited EIS, noting relevant Project refinements and amendments are detailed in the Amendment Report. The Submissions Report should be read in conjunction with the Amendment Report, available on the Major Projects portal: [Hills of Gold Wind Farm | Major Projects Planning Portal](#).

1.2 Project Overview

The Project involves the construction, operation and decommissioning of a wind farm including wind turbine generators and associated infrastructure including a battery energy storage system, electrical substation, operations and maintenance facility, electricity infrastructure, internal access roads, external road upgrades and temporary construction works and facilities.

A Project layout **as exhibited in the EIS** is detailed in Figure 1-2.



Legend

Project Area

Major Road

Minor Road

Track-Vehicular

Watercourses

LGA Boundary

National Park

Nature Reserve

State Forest

Source:
BaseData - DLPI DCDB, DTDB 2020
ESRI World Imagery Dec 2018, ERSI World Street Map

Regional Locality Plan

F1-1

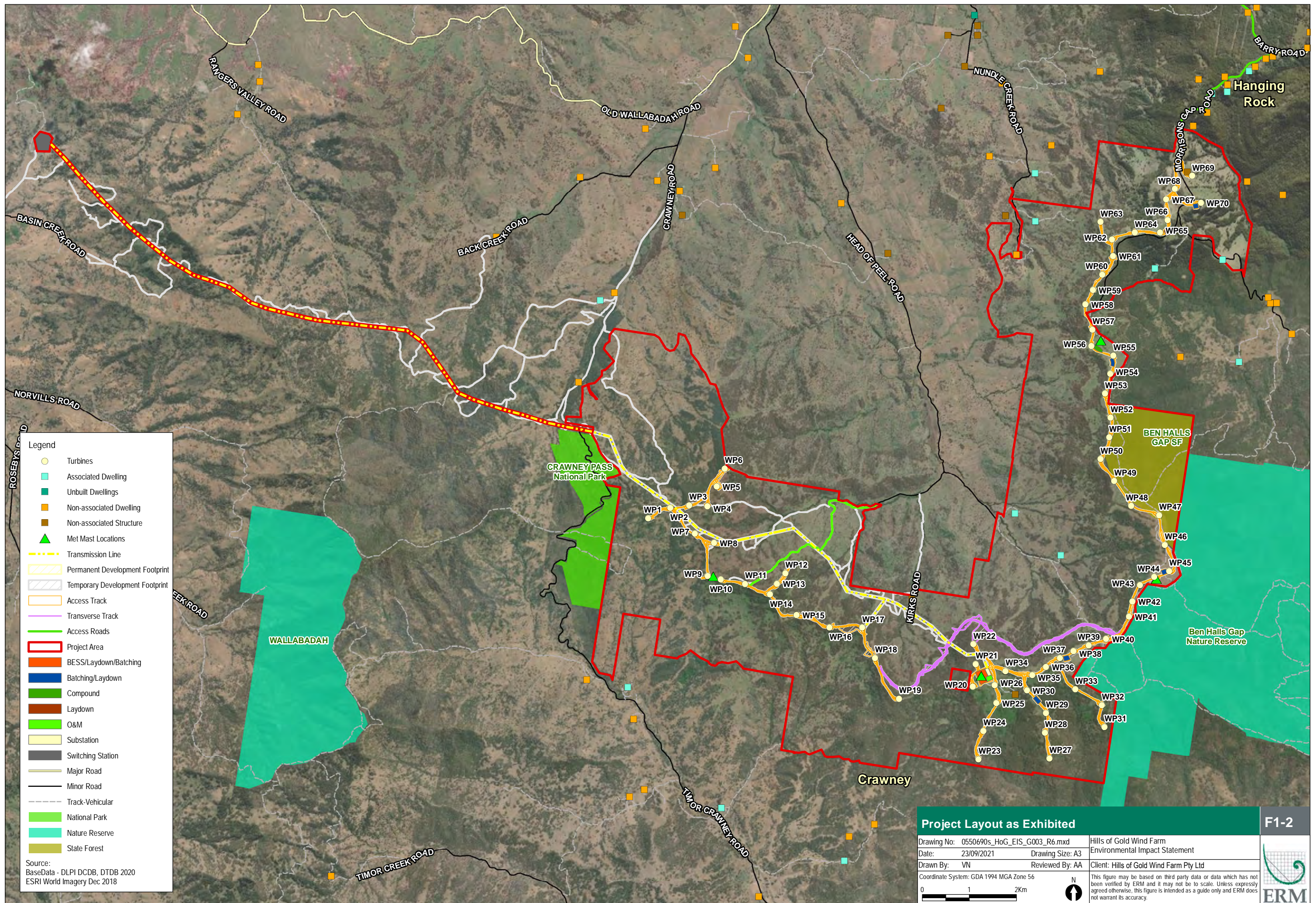
Drawing No: 0550690s_HoG_EIS_G001_R6.mxd	Hills of Gold Wind Farm
Date: 07/09/2021	Submissions Report
Drawn By: VN	Reviewed By: AA
Client: Hills of Gold Wind Farm Pty Ltd	

Coordinate System: GDA 1994 MGA Zone 56

012Km

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This figure may be based on third party data or data which has not been verified by ERM and it may not be to scale. Unless expressly agreed otherwise, this figure is intended as a guide only and ERM does not warrant its accuracy.



Source:
BaseData - DLPI DCDB, DTDB 2020
ESRI World Imagery Dec 2018

Project Layout as Exhibited		F1-2
Drawing No: 0550690s_HoG_EIS_G003_R6.mxd	Hills of Gold Wind Farm Environmental Impact Statement	
Date: 23/09/2021	Drawing Size: A3	Client: Hills of Gold Wind Farm Pty Ltd
Drawn By: VN	Reviewed By: AA	
Coordinate System: GDA 1994 MGA Zone 56		This figure may be based on third party data or data which has not been verified by ERM and it may not be to scale. Unless expressly agreed otherwise, this figure is intended as a guide only and ERM does not warrant its accuracy.
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2 RESPONSE TO SUBMISSIONS APPROACH

2.1 Methodology

The Submissions Report has been prepared in accordance with *State Significant Development Guidelines – Preparing a Submission Report, Appendix C to the State Significant Development Guidelines* (DPIE, 2021)

A Response to Submissions Framework was developed by the Proponent to provide a clear methodology for:

- analysing submissions;
- undertaking further consultation;
- refining Project design; and
- undertaking further assessment of impacts of the Project.

The Framework is summarised below and presented in Figure 2-1.

2.1.1 Analysis of Submissions

All submissions received were collated and categorised based on the following:

- public authority (government);
- individual public submissions; and
- community organisations.

There were a total of 41 duplicate submissions from the public which were excluded from the final count.

Each submission was reviewed, the key themes were noted down in a register and responses were prepared by the Proponent and / or ERM, with relevant specialist technical input. All responses and additional technical assessments have been completed by the same study team that prepared the EIS, with additional technical specialists associated with transmission route vegetation impact, geotechnical and geophysical conditions, Devil's Elbow visualisation and design.

Comments in the community and individual submissions were themed using the following key categories:

- biodiversity;
- traffic and transport;
- project justification;
- landscape and visual;
- noise and vibration;
- hazards;
- soils and water;
- environmental impact;
- social and economic; and
- heritage.

2.1.2 Undertaking Further Consultation

A register was established for all Agency, Organisation and Public submissions received.

Agency submissions were categorised by agency and each issue and request noted. The Proponent worked with relevant technical consultants on potential solutions prior to contacting agencies to discuss proposed further actions. Agreed actions were captured in meetings with agencies and the Proponent undertook to either amend the Project with re-assessment of impact or carry out additional assessment or surveys. A summary of consultation undertaken with councils is provided in Section 4.1 and agency consultation is summarised in Section 4.2. Responses are provided specific to the agency submission in Chapter 5.

Organisations submissions were categorised in the same manner as Agency submissions. Consultation with some community organisations was undertaken to better understand issues raised in the submission and provide early responses where available. Consultation undertaken with community organisations is discussed in Section 4.3 Stakeholder Engagement and the associated Stakeholder Engagement Register (refer to Appendix C). Issues are summarised along with community responses in Chapter 6. More detailed responses specific to each organisation are provided in Annexure B.

Community consultation was offered to individuals from the public via a number of methods. One-on-one consultation was carried out with some individuals and businesses along the transport route and all landowners required for road upgrades, within 5 km of proposed turbines or with moderate-high visual impacts. Personal consultation was also available to any interested stakeholder via a range of means despite COVID-19 restrictions. Chapter 4.3 Stakeholder Engagement highlights the options available since public exhibition and specific interactions are listed in the Stakeholder Engagement Register (refer to Appendix C). It should be noted that COVID-19 travel restrictions limited the ability for consultants and the Proponent to visit homes during much of the time since public exhibition.

2.1.3 Updated Project Design

Based on the issues raised in submissions and the outcomes of further consultation with key stakeholders, the Proponent engaged technical consultants to target further refinements and amendments to the Project to further reduce the impacts of the Project and address key concerns raised by agencies, community organisations and the public. This multi-disciplinary assessment ensured that any changes recommended by one consultant, were assessed in tandem to avoid any unintended impacts in other areas. An example of this was changes to the proposed O&M facilities location due to results of the hazards and risk assessment which required assessment against potential heritage, biodiversity, noise and visual impact assessment. Project refinements were targeted towards the key issues raised in submissions generally, such as traffic, biodiversity and visual impacts. Further, specific refinements and amendments were made to directly address particular concerns, including concerns of residents close to the Project on issues such as soil erosion and sediment control or the impact of road upgrades on their property.

An Amendment Report is provided in conjunction with this Submissions Report outlining key Project changes.

2.1.4 Undertaking Further Assessment of Impacts

Following amendments and refinements to the Project, and in response to request for further assessment in some cases, technical experts conducted further assessment of the Project as against the impacts described in the EIS. These updated impacts are described in the Amendment Report and are referenced in this document where the amendment or refinement was in response to submissions made in relation to the Project (refer Chapter 5 Responses to Agency Responses, Chapter 6 Community Organisation Submissions and Responses to Public Submissions and Appendix B).

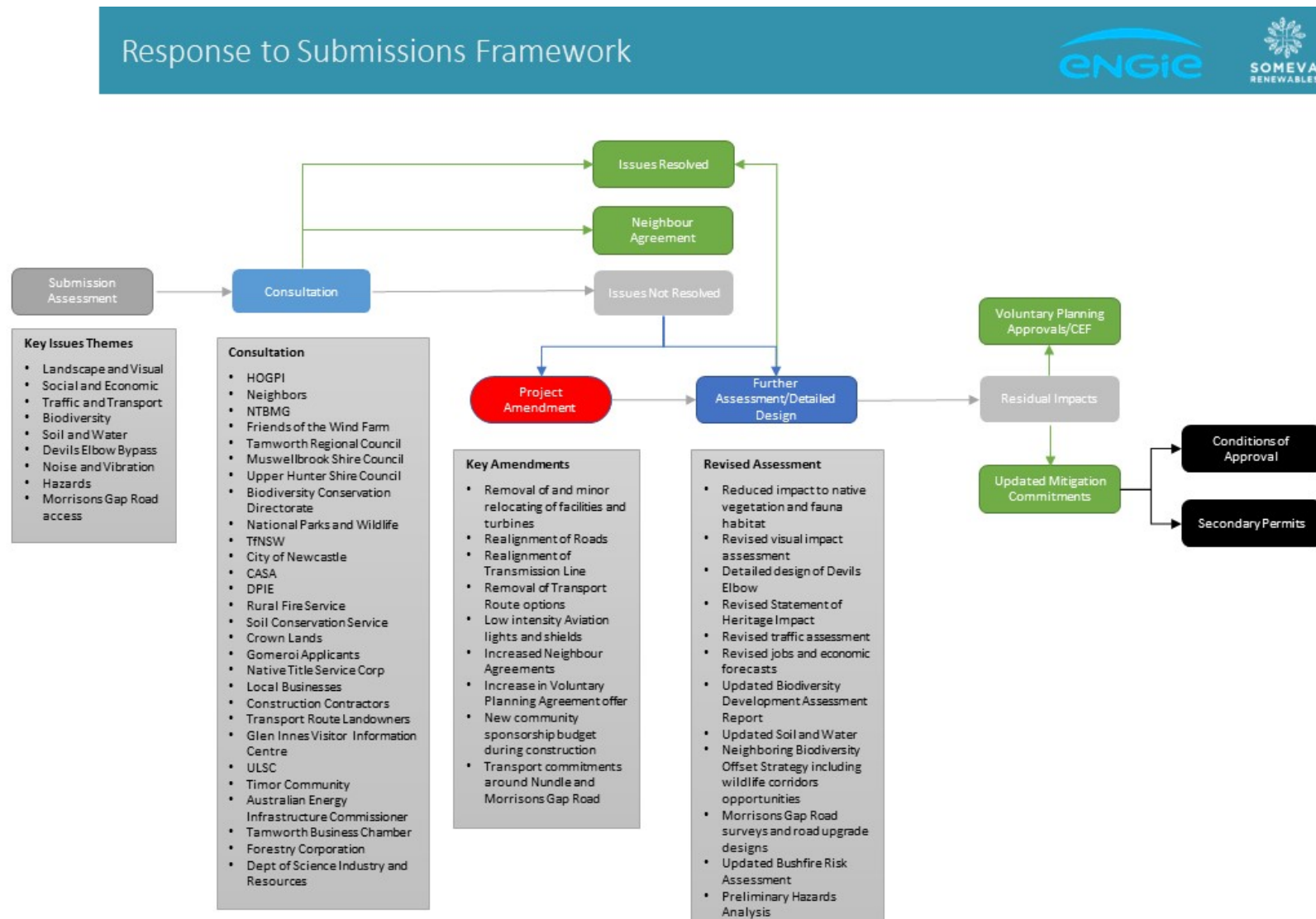


Figure 2-1: Response to Submissions Framework

3 ANALYSIS OF SUBMISSIONS

3.1 Number of Submissions

A total of 624 submissions on the Project were received from Government agencies, organisations and members of the public (excluding duplicates and one submission from "Department of Transport" about the abolition of Roads and Maritime Services). DPIE also commented on the EIS relating to hazards. The submissions are available on DPIE's Major Projects website and are broken down as follows:

- 592 public submissions (excluding duplicates);
- 11 community organisation submissions; and
- 21 Public Authority submissions (excluding submission from "Department of Transport" about the abolition of Roads and Maritime Services).

Additional comments were received on 24 February 2021 from DPIE via email, on 8 March 2021 from Upper Hunter Shire Council via email and on 10 March 2021 from NSW Rural Fire Service, which have also been considered in this Submissions Report.

A breakdown of the submissions by type (support, object, comment) is detailed in Table 3-1 and illustrated in Figure 3-1.

Table 3-1: Breakdown of Submissions Received

Type	Object	Support	Comment	Total
Public Authority*	2	2	17**	21
Public***	383	204	5	592
Community Organisation	8	2	1	11
TOTAL	393	208	23	624

* Excludes comments from "Department of Transport" about abolition of Roads and Maritimes Services.

** Includes submission from NSW Rural Fire Service (RFS) dated 10 March 2021.

*** A total of 41 duplicate public submissions (all objections) were excluded from final count.

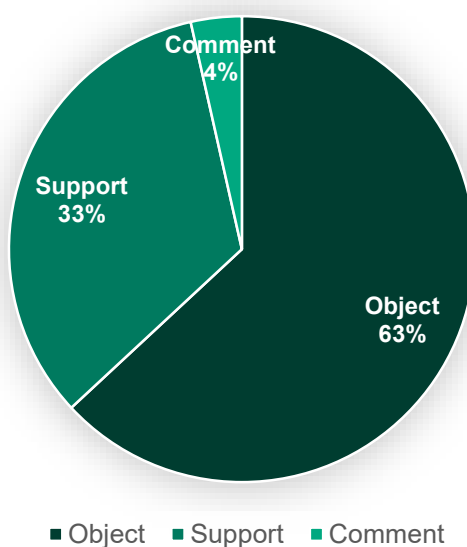


Figure 3-1: Submissions Overview

A total of 11 submissions were received from the following community organisations:

- Australasian Cave and Karst Management Association;
- Newcastle and Hunter Valley Speleological Society;
- Volunteer Organisation PTSD Care;
- Friends of Kentucky Action Group;
- Timor Community;
- RE-Alliance;
- Tamworth Regional Residents and Ratepayers Association;
- Hills of Gold Preservation Inc.;
- Ryde Gladesville Climate Change Action Group;
- Upper Peel Landcare Group; and
- Yass Landscape Guardians.

A register of community organisation and public submitters is provided in Appendix A.

A total of 21 public authority comments and submissions were received from:

- DPIE Environment, Energy and Science (EES) (Biodiversity and Conservation);
- DPIE Water and the Natural Resources Access Regulator (NRAR);
- NSW Environment Protection Authority;
- Transport for NSW, Roads and Maritime Services Division;
- WaterNSW;
- Crown Lands;
- Department of Defence;
- Department of Primary Industries, Agriculture Land Use Planning Division;
- Department of Primary Industries, Fisheries NSW;
- Heritage NSW;
- National Parks and Wildlife Service;
- NSW Department of Regional NSW, Mining, Exploration & Geoscience (MEG) Division;
- NSW Rural Fire Service;
- Airservices Australia;
- Civil Aviation Safety Authority;
- Forestry Corporation of NSW;
- Muswellbrook Shire Council;
- Cessnock City Council;
- City of Newcastle;
- Tamworth Regional Council; and
- Upper Hunter Shire Council.

An additional comment was received from Transport for NSW (under the name Department of Transport) which did not comment on the Project but rather advised that a collective response would be provided by RMS.

3.2 Geographic Analysis

A total of 592 unique public submissions were received from residents located across 70 NSW LGAs and 9 interstate LGAs. A total of six (6) submissions were received from an unknown location. A slight majority (319, or 53.9%) of public submissions were received from residents of the Tamworth Regional LGA, which is one of the three LGAs which the Project Area is situated within. Of these 43.2% support the Project.

Public submissions received from residents in the other two LGAs which the Project Area is situated within were significantly less, with a total of 17 (2.8%) submissions received from Upper Hunter LGA, and 3 (<1%) submissions received from Liverpool Plains LGA.

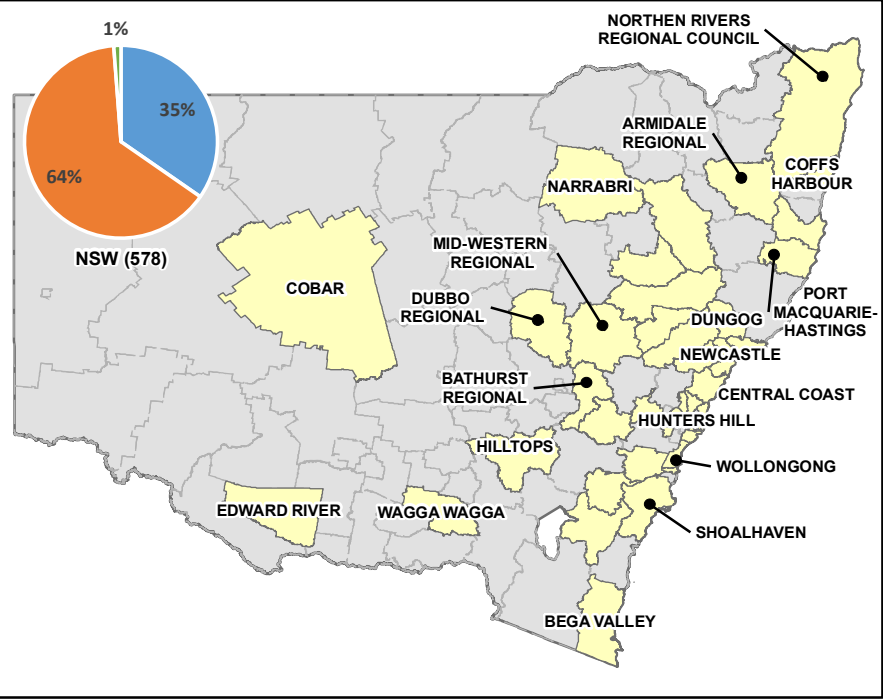
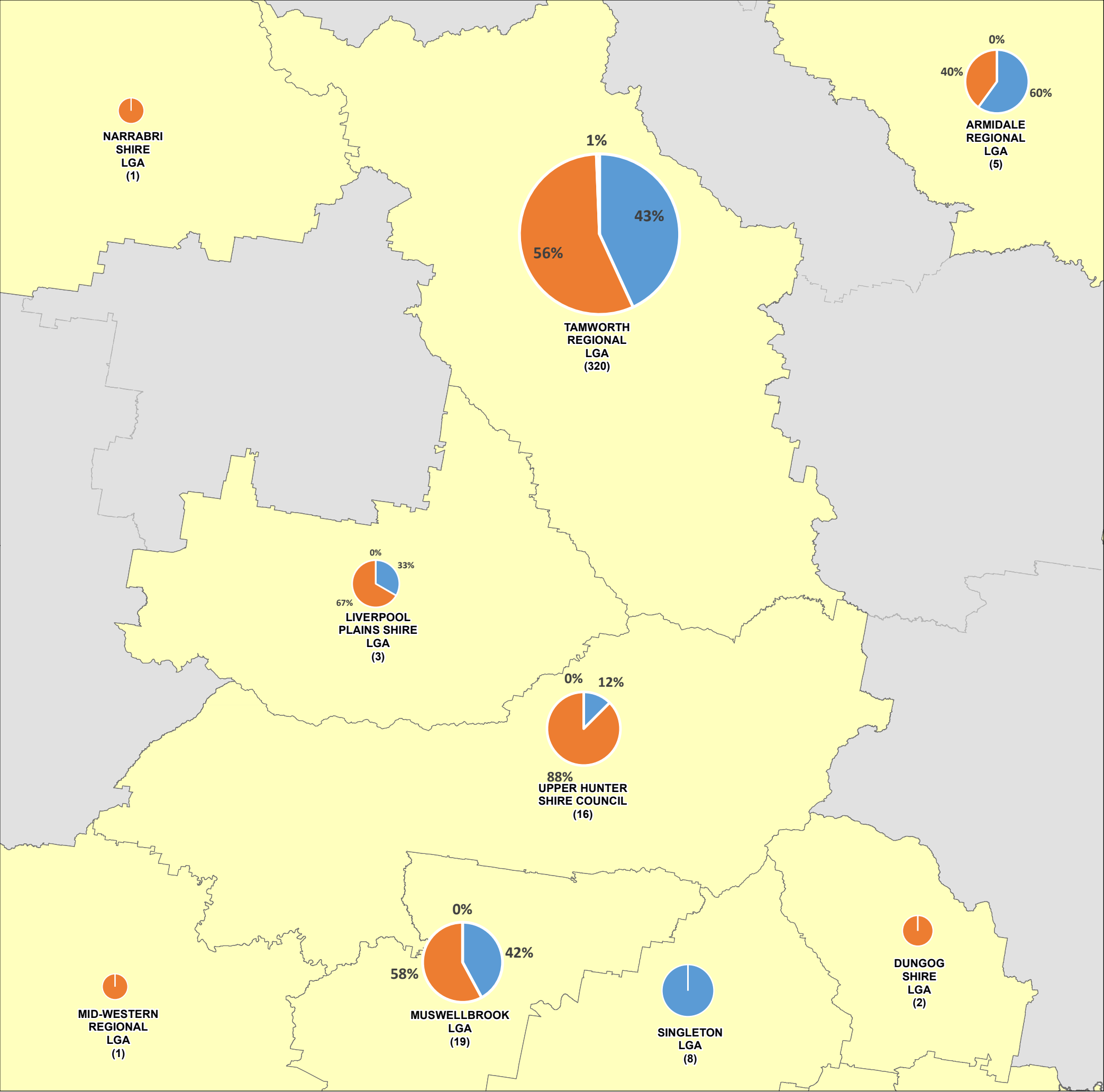
A total of 43.3% of submissions were received from residents located in LGAs not hosting wind turbine infrastructure.

Residents located in the City of Lake Macquarie LGA and Muswellbrook LGA provided 26 (4.3%) and 19 (3.2%) public submissions in relation to the Project.

From the Nundle community there were 94 supporting submissions for the Project and from the Hanging Rock community there were 28 supporting submissions.

There were 115 objections from residents in the Nundle community, 28 objections from residents in the Hanging Rock community and seven objections from residents in the Timor community. The Project received more supportive submissions than any other wind farm in NSW has to date. Of this, the majority came from host communities in and around Nundle and Hanging Rock. These numbers demonstrate both strong community engagement by the Proponent and unusual strong vocal support for the Project.

Figure 3-2 and Figure 3-3 illustrate the geographic distribution of public submissions received across NSW and Australia, including the position (Support, Object, Comment) of the responses.



Legend

- Support
- Object
- Comment
- Submission Provided

Source:
BaseData - GA 2021

Geographic Distribution of Community Submissions in NSW

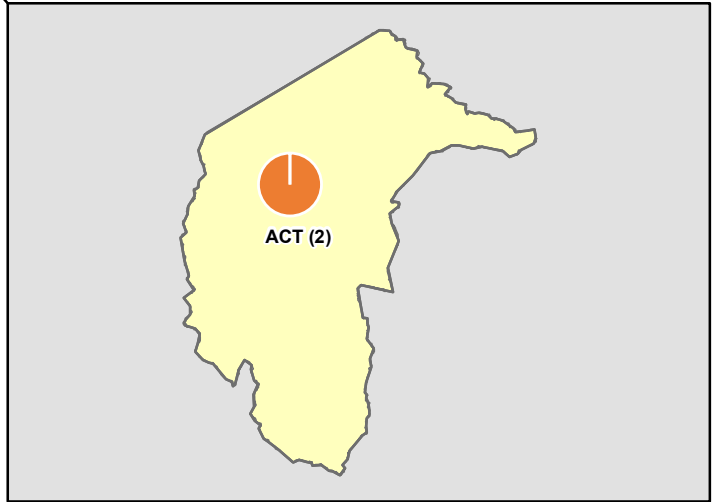
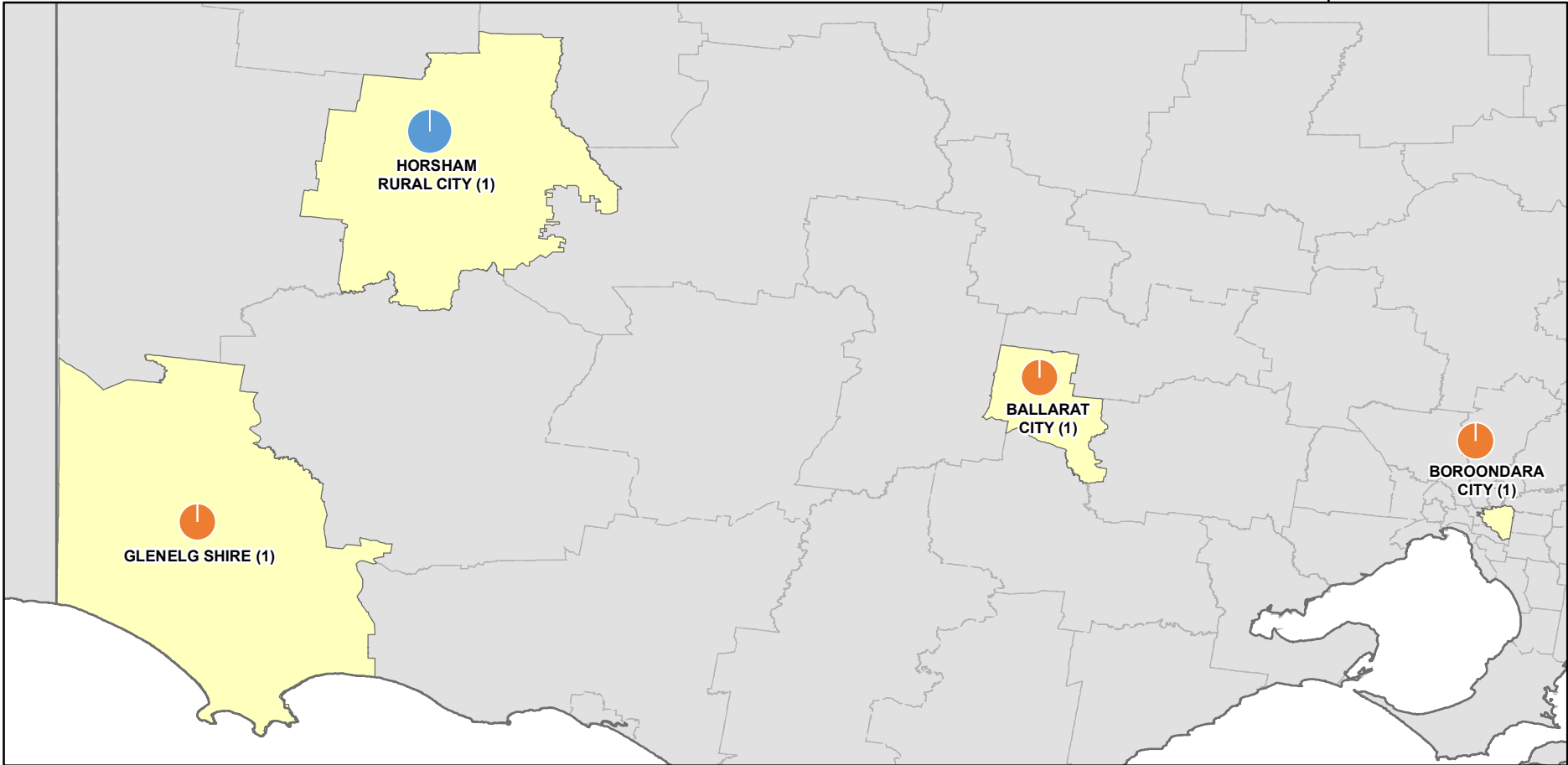
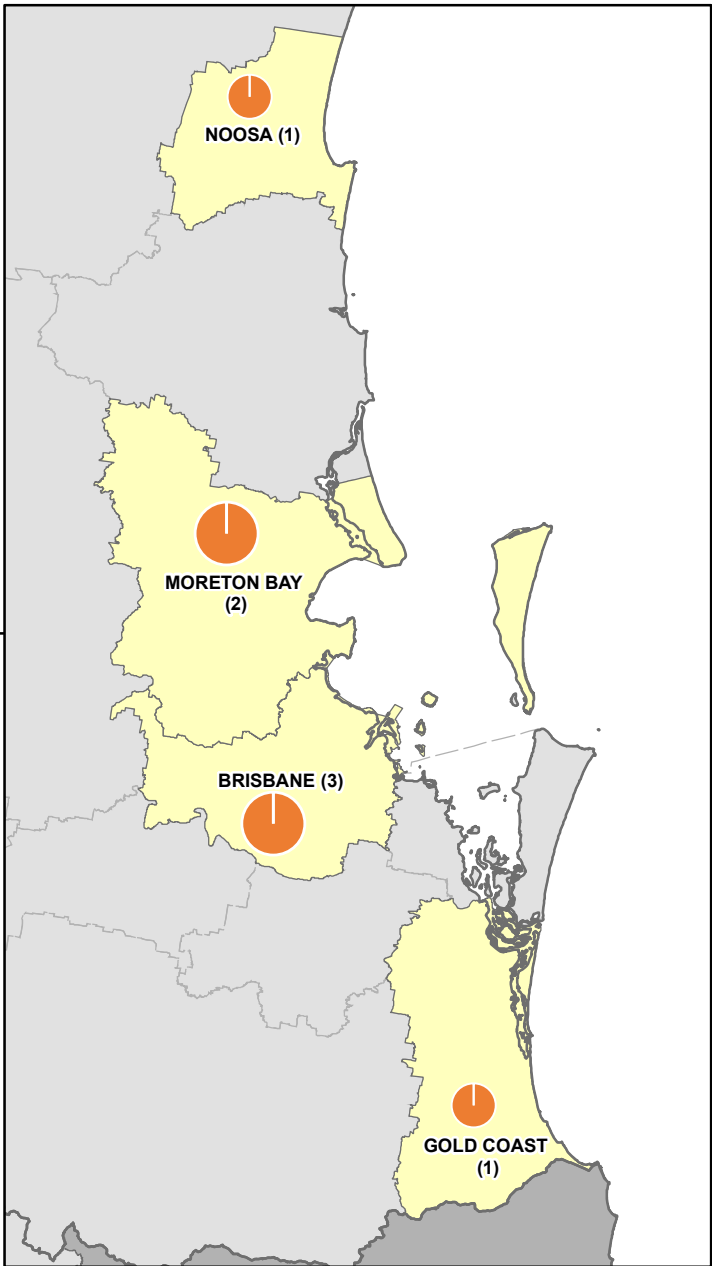
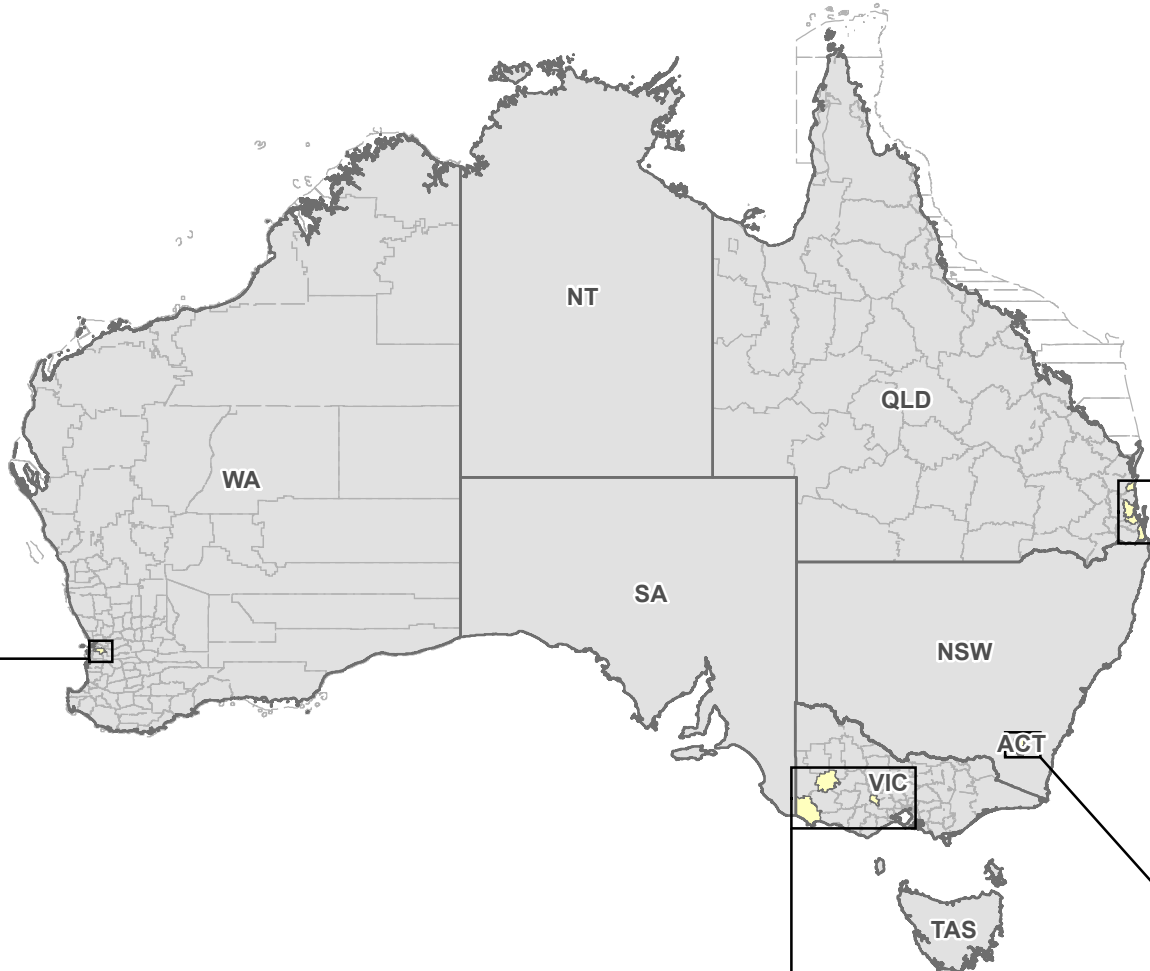
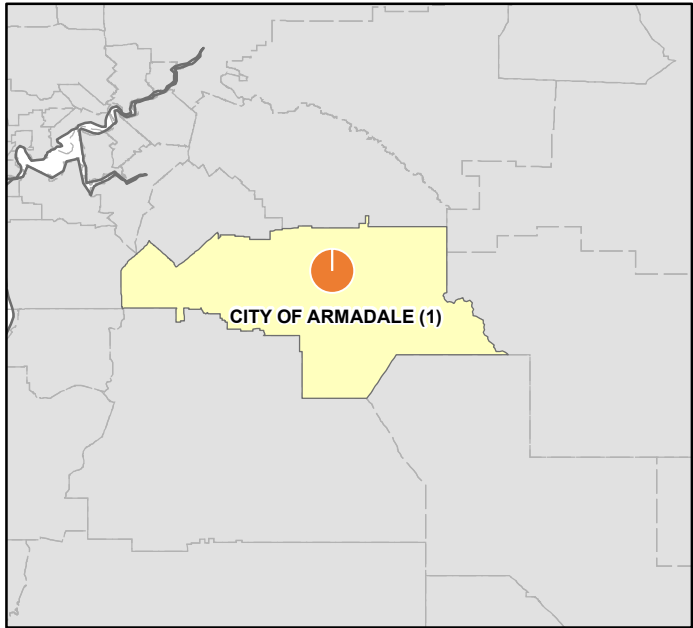
F3-2

Drawing No: 0550690s_HoG_DS_G002_R3.mxd	Hills of Gold Wind Farm
Date: 02/06/2021	Historic Heritage Assessment
Drawn By: VN	Reviewed By: AA
Client: Hills of Gold Wind Farm Pty Ltd	
Coordinate System: GCS WGS 1984	This figure may be based on third party data or data which has not been verified by ERM and it may not be to scale. Unless expressly agreed otherwise, this figure is intended as a guide only and ERM does not warrant its accuracy.



Legend

- Support
- Subject
- Comment
- Local Government Area
- Submission Provided



Source:
BaseData - GA 2021

**Geographic Distribution of Community Submissions
in Other States and Territories**

Drawing No: 0550690s_HoG_DS_G001_R1.mxd	Hills of Gold Wind Farm
Date: 02/06/2021	Historic Heritage Assessment
Drawn By: VN	Reviewed By: AA
Client: Hills of Gold Wind Farm Pty Ltd	
Coordinate System: GCS WGS 1984	This figure may be based on third party data or data which has not been verified by ERM and it may not be to scale. Unless expressly agreed otherwise, this figure is intended as a guide only and ERM does not warrant its accuracy.



F3-3



3.3 Summary of Key Matters Raised in Community Submissions

3.3.1 Community Support

A summary of key matters raised in community submissions in support of the Project is provided below in Table 3-2.

Table 3-2: Key Matters raised in Community Submissions (Support)

Theme	Matter raised
Biodiversity	Impacts offset by the NSW Biodiversity Offsets Scheme
	Rehabilitation of cleared areas consisting of non-native species with natives
Traffic and transport	Improvements to local road networks
Project justification	General support for renewable energy / fossil fuel transition
	Site suitability (e.g. high wind area, existing transmission line)
	Thorough community engagement, including with First Nations people
	Alternative to coal-fired power stations
	Meeting future energy demand as coal-fired power stations retire and energy transition continues
	Reduce energy prices
	BESS will increase flexibility and reliability of energy system
	Project alignment with NSW Energy Roadmap
	Project alignment with renewable energy targets
Landscape and visual	Neutral impact on visual amenity
	Positive impact on visual amenity (e.g. "symbols of the future")
Hazards	Improvement to local roads on adjoining properties will be beneficial for firefighting purposes and bushfire risk mitigation
Environmental impact	Opportunity for landowners to manage water supply, bushfire risk, biodiversity, and pest species
Social and economic	Additional income for landowners, including income for retirement, and a diversified income
	Jobs for the region
	Attract new people and skills to the region during and post construction
	Sustainable employment
	Economic growth for the region, including boost to local business
	Benefits of the Community Enhancement Fund
	Potential increase in real estate value
	Small boost to local population
	Wind farm will attract tourists
	Consideration for the future generations

As stated above in Section 3.1, 204 submissions were received in support from community members. This is considered to be representative of the broad level of support for renewable projects in general and the Project in particular within the broader community as, generally speaking, only community members who hold concerns about projects tend to make submissions in relation to them. This is evidenced by the fact that of the 56 dwellings within 5 km of a turbine only 20 objected to the Project.

In addition to the strong level of support in the submissions received from individuals, two (2) submissions in support were also received from community organisations being the Re-Alliance and the Ryde Gladesville Climate Change Action Group. These organisations together, represent approximately 1,140 community members, including NSW farmers and small businesses.

The main themes raised in the locally based supportive submissions were recognition that the Project will provide economic opportunities for the towns of Nundle and Hanging Rock and will help sustain the towns moving into the future. In particular, local community submissions focused on the ability of the Project to deliver increased employment opportunities for the local area, mainly through increased wages, income and profit to local workers, contractors and suppliers during construction and operation of the wind farm, expected to spend more in the local economy on goods and services.

General support for the Project was predominately drawn from the community's strong commitment to Australia addressing climate change through a transition to clean energy and recognition that the Project plays a key role in this process. In particular, the Project will avoid 608,000 tonnes of greenhouse gas (GHG) emissions per year. The community acknowledged that the Project aligns with Government policy such as the NSW and Commonwealth renewable energy targets. It was also acknowledged by the community that the creation of new electricity generating works, particularly clean energy, is important to meeting future energy demand as coal-fired power stations retire as forecasted, such as the Liddell Power Station which will cease to generate early in 2023.

The community also supported the array of community benefits which the Project will bring to the local and regional economy. The benefits specifically endorsed by the community are listed below and include revised economic benefits:

- the Community Enhancement Fund;
- job creation (211 direct and roughly 404 on-flow jobs during construction and approximately 28 long-term service and maintenance jobs created during Project operation, 16 of which are expected to be site based with additional on-flow jobs of 48 FTE (ie 76 FTE in total during operations);
- economic stimulus through the \$73 million direct injection of income to the regional economy during construction, and \$15.3 million injection per year during Project operations; and
- the voluntary Neighbour Benefit Sharing Program which provides diversified income for neighbouring landowners, including those who are post-retirement.

The community submissions in support also acknowledged that job creation as a result of the Project may attract members of the workforce to permanently settle in the region, further supporting the local and regional economy into the future.

In addition, the suitability of the site selected for the Project was expressly acknowledged by the community with submissions in support noting that it was located in a high wind area, as well as being supported by the existing transmission line between Tamworth and the Liddell Power Station.

The community submissions in support also acknowledged that the Project will offset unavoidable biodiversity impacts in accordance with the NSW Biodiversity Offset Scheme in order to ensure no net loss of biodiversity, as well as through land rehabilitation to ensure the Project Area is progressively rehabilitated throughout the course of construction, enabling the land to continue to be used for farming while providing a diversified income base for host landholders and residents who choose to participate in the voluntary Neighbour Benefit Sharing Program.

3.3.2 Community Objections

A summary of key matters raised in community submissions in objection of the Project is provided in Table 3-3. Responses to the key issues raised in these community submissions has been provided in Chapter 6 of this report.

The community objections to the Project are predominately centred around visual impact, sensitive siting of renewable energy and the traffic and transport impact in Nundle specifically. The key theme amongst the submissions received from the Timor community was concerns with the extent of consultation with the local community.

In addition, the Hills of Gold Preservation Inc (**HOGPI**), which was formed in 2018 by a group of residents concerned about the impact of the Project, made a detailed submission objecting to the Project. The Proponent has been engaging with HOGPI as an organisation on an ongoing basis, as well as with the individual members, to understand their concerns and factor them into the Project design and assessment.

Table 3-3: Key Matters raised in Community Submissions (Objections)

Theme	Matter raised
Biodiversity	Loss of habitats and placing local wildlife under stress
	The risk to bats communities via habitat loss, collision risk and barotrauma
	Tree and vegetation loss
	Impacts to the local Eagle population
	Adequacy of biodiversity survey methodology
	Impact to surrounding nature reserves
	Risk of bird strike
	Impact to endangered species such as Koalas, Greater Gliders, Booroolong Frog and Spotted-Tailed Quoll
	Adequacy of the Biodiversity Offset Plan
Traffic and transport	Increased traffic volumes through Nundle
	Adequacy of consultation with Forestry Corporation and cumulative impacts to school bus routes
	Concerns for safety along school bus routes
	Safety to residents, pedestrians and other road users associated with increased OSOM vehicle usage
	Dust generation
	Disruption caused by required road upgrades
	Road maintenance commitments during construction and operational phases
	Viability of Devil's Elbow road upgrade and the impact to Black Snake Mine
	Adequacy of assessment of vegetation removal required on transport route
	No park zones in Nundle during OSOM transportation
	Impact on tourism due to construction traffic
	Use of the Head of the Peel Road
Project justification	Site suitability
	Benefits of renewable energy over fossil fuels being questioned

Theme	Matter raised
Landscape and visual	Overall impact of the project on the natural landscape of the surrounding area
	Visual impact to individual properties
	Visual impact of aviation lighting
	Photomontage methodology
	Vegetative screening
	Impact of shadow flicker
Noise and vibration	Effects on health and wellbeing
	Noise assessment methodology
	Impact of noise and vibration during construction and operational phases
Hazards	Impact on likelihood of bushfires
	Impact on access for fire-fighting services
	Proposed fire mitigation measures
	Dangers of blade throw
Soils and Water	Adequacy of hydrological impact assessment
	Erosion and landslip risk associated with construction on steep slopes
	Effects project infrastructure on water runoff
	Project water consumption
Environmental impact	Mitigation measures to prevent harmful project wastes feeding into watercourses
	Land clearing
	Rehabilitation and decommissioning
	Recycling and replacement
Social and economic	Adequacy of information on the financial benefits to stakeholders
	Adequacy of analysis of community objections
	Community engagement methodology
	Job creation data and statistics
	Land and property values
	Impact to tourism
	Adequacy of information on the Community Enhancement Fund

4 ACTIONS TAKEN SINCE EXHIBITION OF EIS

This section summarises the additional engagement with stakeholders undertaken by the Proponent following the exhibition of the EIS. An updated stakeholder engagement register is provided in Appendix C. Engagement materials are also provided in Appendix C.

4.1 Council Consultation

Since the lodgement of the EIS, further meetings and correspondence has taken place with each of the relevant local councils, including:

- Tamworth Regional Council:
 - 2 December 2020: EIS dropped off to Tamworth Regional Council at the Nundle Library.
 - 15 March 2021: Meeting held to discuss submission lodged by Council, Key discussion points included Traffic and Transport, Biodiversity, decommissioning, Soil and Water and the Community Enhancement Fund (CEF).
 - 21 April 2021: Follow up meeting held to discuss the CEF. Voluntary Planning Agreement (VPA) offer letter issued for review.
 - May 2021: Meeting held with Tamworth Mayor to discuss the CEF and the Council's submission.
 - 16 June 2021 – Meeting held to discuss the CEF Offer Letter and engineering design refinements to the Devil's Elbow transport route upgrades.
 - 30 June 2021 – Meeting with Tamworth Regional Council planning staff to discuss the response to Council's submission. An information package was sent to Council a fortnight before the meeting, with draft responses and updated engineering and technical documents.
 - 21 September 2021 – Councillors Webinar to discuss Project updates and amendments and general wind farm information. A summary of the response to Council submissions was provided prior to the webinar.
 - 12 October 2021 – Project update letter and request for project support sent to Council's planning team.
 - 20 October 2021 – Meeting with planning staff to discuss project updates. A 3D visualisation of the proposed Devil's Elbow bypass was presented to Council.
 - 15 November 2021: In person meeting with Council to discuss outstanding concerns, an update on the Submission Report and Amendment Report and ongoing community consultation at the Community Information Hub.
 - 25 November 2021 – Meeting with Council's heritage expert, planning staff and ERM archaeologist to discuss addendum heritage report on Devil's Elbow bypass.
 - 9 December 2021 - Final meeting before submission of the Submissions Report. Presentation of visual photomontages displaying proposed road upgrades along Morrisons Gap Road (as requested by Council, and presented in Appendix G of the Amendment Report), discussion on ERM's response to the heritage meeting on 25th of November 2021 and feedback that conditions will be provided to DPIE and Proponent for road usage before Christmas.
 - December 2020 – December 2021: various emails and phone calls with Councillors and Council staff relating to the Project, proposed site tour and provision of newsletter etc.
- Upper Hunter Shire Council:
 - 5 March 2021: Upper Hunter Shire Council Meeting to discuss their submission on the Project.

- 29 March 2021: Meeting held to discuss submission lodged by Council; and specifically the CEF.
 - 16 April 2021: Draft VPA offer letter issued to Council for review.
 - 22 April 2021: Further consultation via phone and email held with Council to develop the CEF approach.
 - 19 May 2021: Updated VPA offer letter issued to Council for review following Council feedback.
 - 30 June 2021: Upper Hunter Shire Council meeting to discuss VPA offer letter.
 - 1 July 2021: Upper Hunter Shire Council VPA offer letter acceptance email.
 - 26 July 2021: Presentation to UHSC Councillors and planning staff with responses to key issues raised in earlier consultation and Project update.
 - 15 of November 2021: In person meeting with Upper Hunter Shire Council to discuss their submission on the Project.
 - 8 December 2021: Final meeting before lodgement of the Submissions Report with Project update and consultation completed recently.
- Muswellbrook Shire Council:
- 31 March 2021: Meeting held to discuss submission lodged by Council, particularly comments raised relating to traffic and transport. Term sheet with proposed usage fee issued to Council for review.
 - 2 June 2021: VPA Offer letter sent to Council.
 - 5 July 2021: Email received from Council advising Planning staff at Muswellbrook Shire Council were approved by the councillors to withdraw Council's objection to the Project based on the outcome of ongoing VPA negotiations.
 - 16 July 2021: Meeting held to discuss transport routes through Muswellbrook and discuss steps to reach an in-principal agreement.
 - August 2021: various emails regarding councillor's workshop to discuss the Project.
 - 18 October 2021: Letter to Muswellbrook Shire Council with commitments regarding the use of roads to transport OSOM components to the Project site.
 - 19 – 23 November 2021: Emails between Proponent and Muswellbrook Shire Council regarding broader concerns with Council assets use for New England Renewable Energy Zone. Muswellbrook Shire Council responded suggesting roads use for all renewables projects in the REZ is a broader industry matter under negotiation with the DPIE/EnergyCo, and Muswellbrook Shire Council acknowledge that the Proponent needs to submit with current proposal.
- City of Newcastle:
- 1 June 2021: Meeting to discuss impacts to Council operated roads and potential risk of damage. Submissions responses prepared and approved in consultation with Council.

4.2 Regulatory Engagement

Since the lodgement of the EIS, further meetings and correspondence has taken place between government agencies and the Proponent. The following list provides a summary of this key regulatory engagement:

- DPIE:
- 24 February 2021: Email received from DPIE commenting on the EIS, specifically relating to hazards and risks.

- 8 March 2021: Meeting held with DPIE and TfNSW relating to the Transport Assessment and transport routes.
- 9 March 2021: Meeting held with DPIE hazards team to discuss DPIE comments and requirements relating to the BESS and further consideration of hazards, including provision of a Preliminary Hazard Analysis.
- 13 April 2021: Meeting held with DPIE to discuss status of Submissions Report, Visual Impact Assessment, neighbour agreements, update to key agencies consulted, traffic route changes and private landowners consulted, voluntary planning agreement status and biodiversity assessment updates.
- 4 June 2021: Meeting held with DPIE and their visual advisor Mr O'Hanlon to discuss visual impacts following DPIE site visit and consultation with stakeholders.
- 28 July 2021: Consultation update meeting to discuss status of response to submissions and relevant topics present in the submission on the Project.
- 23 Aug 2021: Meeting with DPIE regarding updated Project layout and Submissions Report update.
- 15 October 2021: Meeting to discuss status of neighbour agreements and refined designs of the Devil's Elbow bypass included in Appendix H: Traffic and Transport Addendum.
- 22 November 2021: Discussion with DPIE regarding dwelling entitlement assessment in proximity to turbines.
- 14 December: Final meeting to discuss updated assessments and submission of the Submissions Report and Amendment Report.
- Regular calls with DPIE to discuss progress on key issues identified within meetings above.
- Transport for NSW (TfNSW):
 - 8 March 2021: As noted above, combined meeting with DPIE to discuss the Traffic and Transport Impact Assessment and transport routes.
- Office of the Australian Energy Infrastructure Commissioner:
 - 27 January 2021: Phone call to discuss blade throw risk.
 - 19 October 2021: Video-conference to discuss precedence with aviation safety lighting and amended CASA guidelines.
- Port of Newcastle (PoN):
 - 2 March 2021: Meeting held to discuss component delivery timeframes and impacts on local traffic movements, required upgrade works in and around PoN, agreements on remediation procedure and a consent letter for PoN.
- National Parks and Wildlife Service (NPWS):
 - 18 May 2021: Meeting held to discuss NPWS submission and review Project commitments to ensure NPWS acceptance of key items raised.
 - 28 July 2021: Consultation update meeting to discuss status of response to submissions and relevant topics present in the submission on the Project.
 - 5 August 2021: email consultation regarding Devil's Elbow bypass.
 - 5 October 2021: Updated BDAR issued to NPWS for review and comment ahead of lodgement of Submissions Report.
- NSW Rural Fire Service:
 - 3 March 2021: Phone discussion regarding the Bushfire Risk Assessment.

- 5 August 2021, 25 August 2021, 2nd September 2021 and 3 September 2021: email consultation regarding Devil's Elbow bypass.
- DPIE Environment, Energy and Science (EES)– Biodiversity Conservation Division:
 - 27 May 2021: Meeting held to discuss EES submission and ensure the department is comfortable with the Project's approach to key items raised.
- Civil Aviation Safety Authority (CASA):
 - 29 June 2021: letter to CASA seeking to use 200 candela low intensity lighting.
 - 19 July 2021: Email response from CASA confirming acceptability of 200 candela low intensity lighting.
 - 16 September 2021: email to CASA with attached draft Obstacle Lighting Plan seeking CASA review and comment on the acceptability of the plan.
 - 19 September 2021: Email from CASA confirming acceptance of the Obstacle Lighting Plan.
- DPIE Environment, Energy and Science (EES) – Biodiversity, Conservation and Science Directorate:
 - 3 February 2021: Meeting with DPIE Biodiversity and Conservation Division (BCD) to discuss BDAR.
 - 27 May 2021: Meeting held to discuss EES submission and review Project commitments to ensure EES acceptance of key items raised.
 - 12 July 2021: Update email to EES confirming status of updated BDAR and timeframes for issue to EES.
 - 5 October 2021: Updated BDAR issued to EES for review and comment ahead of lodgement of Submissions Report.

4.3 Stakeholder Engagement

The Proponent presented a Stakeholder Engagement Strategy in Appendix C of the EIS. The Proponent has continued to engage key community groups identified in this strategy. In addition to the Engagement Strategy and as a result of COVID-19, a Tamworth based communications firm, C7EVEN, has been supporting community consultation to provide local representation for community consultation.

The Proponent has continued to engage community members and will continue to do this through assessment, construction and operation of the Project. The Proponent will continue to offer face-to-face meetings, establish a temporary office for visits and undertake media opportunities to further explain details of the project while the Project is being assessed.

Further engagement commitments to the Engagement Strategy are made throughout this document, particularly in relation to transport with commitments including SMS notifications services and establishment of a community information office in Nundle.

Since the lodgement of the EIS, a number of methods have been used to engage with the community and stakeholders. This includes the creation of a Community Information Hub at Nundle War Memorial Hall, provision of EIS materials at Nundle Library, and updates to the Project website: [Home | hills-of-gold-energy \(hillsofgoldenergy.com\)](https://hills-of-gold-energy.hillsofgoldenergy.com). Other methods have included face-to-face meetings, phone calls, emails, and door knocks. An overview of these community and organisation engagement activities since lodgement of the EIS is summarised in Table 4-1 and further details are provided in the Stakeholder Engagement Register and engagement materials (see Appendix C).

Table 4-1: Summary of Engagement Undertaken by Stakeholder Group

Stakeholder Group	Project Consultation			
	Phone calls	Emails	Face to Face meetings (inc Video conference calls)	Site Visits
Neighbours (within 5 km of the project)	139	196	44	21
Government Agencies and Organisations	13	71	34	2
Community Members (outside of 5 km to the project)	119	220	56	22
Total Interactions	271	487	134	45

4.3.1 Community Information Hub and EIS Accessibility

A pop-up community information hub was created from 7 December 2020 to 29 January 2021 at the Nundle War Memorial Hall, Nundle, with opening hours from Monday to Wednesday, 10:00 am to 4:00 pm (excluding a two week break over the Christmas and New Year period).

The information hub provided an opportunity for community members and stakeholders to speak with representatives of the Proponent and to view Project information including high quality public viewpoint photomontages and posters that summarise the chapters in the EIS (refer to Appendix C for copies). The Community Information Hub included COVID safe practices such as a booking system, QR codes, and a sign-in register.

Approximately 100 community members and stakeholders attended the community information hub. A photograph of the community information hub set-up is provided in Figure 4-1.



Figure 4-1: Photograph of Community Information Hub Set-up, EIS Exhibition December 2020 – January 2021

From 2 December 2020 the community were also invited to visit Nundle Library, Nundle to view and/or borrow the following information:

- two (2) sets of enlarged and high-quality public viewpoint photomontages, one on display and one for borrowing;
- pre-loaded USB drives with copies of the EIS available for borrowing; and
- a printed version of the EIS.

The community was notified of these engagement opportunities through an advertisement in the local newspaper Northern Daily Leader on the 28th of November 2020, and a notification email distributed to community members and stakeholders registered on the Project mailing.

4.3.2 Project Website

A Project website has continued to be updated on an ongoing basis to ensure that up to date information on the project remains available to the community. The Project website can be found at: <https://www.hillsofgoldenergy.com/>. It includes important information about the Project and its benefits; a summary of the planning pathway; news and updates; minutes of the CCC; and contact information, including a Project email address: info@hillsofgoldenergy.com.

A Frequently Asked Questions (FAQ) page was added to the website, to answer common questions asked by the community. This was advertised in a Winter 2021 Newsletter, which provided key updates to the community.

4.3.3 Project Visualisation Video

A Project visualisation video was prepared to provide the community and other stakeholders with an overview of the Project, including locality and setting, process of layout and refinements, environmental impact assessment and the social and economic benefits of the Project. The visualisation is accessible from the Hills of the Gold website: [Hills of Gold Visualisation](#) and is also accessible via: [ENGIE x Hills of Gold on Vimeo](#).

4.3.4 Targeted Stakeholder Engagement Since EIS

Ongoing targeted stakeholder engagement has continued since lodgement of the EIS. The key ongoing community engagement activities undertaken are outlined in Table 4-2.

Table 4-2: Targeted Stakeholder Engagement Overview Since Lodgement of EIS

Stakeholder	Interaction record	Description
Nundle and Hanging Rock residents	41 face-to-face interactions with Community members through door knocking	December 2020 / January 2021: Regular door knocks were conducted during the public exhibition of the EIS for residences in Nundle and Hanging Rock (December 2020 / January 2021). The door knocks were an opportunity to communicate key project information, and to distribute posters which contained a summary of the EIS. A number of follow up meetings, phone calls and emails were also exchanged with residents to discuss the Project and status of ongoing assessment.
Nundle Community Information Hub (Dec 2020, Jan 2021 and Nov 2021)	Approximately 150 interactions with members of the Nundle and Hanging Rock Community	A Community Information Hub in Nundle was opened during public exhibition between December 2020 and January 2021. A drop in Community Information Hub was set up in Nundle prior to response to submissions from the 8th to the 10th of November 2021 and the 15th to 17th of November 2021. Project fact sheets with key updates to the Project were distributed and discussed with the local community.
Hanging Rock Community Drop-In BBQ	Approximately 25 community members in attendance	A Community drop-in session and BBQ was held at the Hanging Rock Hall on the 15th of November 2021. There was discussion amongst community members about the Project broadly.
Timor Community Information Hub	Three community members attended	The Information Hub was set up at the Timor Community Hall on the 11th of November 2021. Project fact sheets with key updates to the Project were available for the local community.

Stakeholder	Interaction record	Description
Project Newsletters	Issue 4: 154 people reached Issue 5: 159 people reached Issue 6: 189 people reached	Issue 4: April 2021 – Hills of Gold Wind Farm Newsletter Issue 5: August 2021 – Hills of Gold Wind Farm Newsletter Issue 6: November 2021 – Hills of Gold Wind Farm Newsletter
Project Media	9+ news articles 4+ TV segments 4+ radio segments	The Project has featured in the Northern Daily Leader (6 articles), The Australian (1 article) and The Guardian (2 articles) newspapers, with multiple articles. A digital article was published on Renew Economy and there have been several TV news stories on the Project through Prime7 News, NBN News Tamworth and NBN News Coffs Harbour. The project has also been featured on ABC New England North West several times, as well as 88.9FM and 92.9FM. Paid print media on ENGIE involvement in renewables in the region through Northern Daily Leader and local radio advertisements.
Project Flyer	Displayed between 2 December 2020 until 29 January 2021	Project posters summarise technical chapters in the EIS were on display in the in the Community Information Hub.
Neighbour Consultation since Public Exhibition (within 5 km of the project)	Since the beginning of public exhibition there have been 64 phone calls 62 emails 12 face-to-face meetings	Neighbours within 5 km have continued to be consulted and updated on Project updates. This has occurred through email updates and phone calls, with any specific updated assessments being shared with neighbours.
Community Consultative Committee	The meeting minutes with the presentation delivered and a summary of conversation are uploaded to the Hills of Gold Energy website after each meeting.	Extraordinary CCC Meeting, 29 th September 2021, held remotely via Dial-in Teleconference to provide an update to the project amendments and response to submissions reporting.
NTS Corporation		28 January 2021, Consultation with Gomeroi applicant Rose Nean 14 April 2021, Meeting held to discuss the Gomeroi Native Title Claim and future engagement with claimant in relation to the Project. 17 April 2021, Meeting with community in Timor to discuss Project with Gomeroi applicant present. April-December 2021 Regular calls and emails to NTS Corporation regarding the Gomeroi Native Title Application.

Stakeholder	Interaction record	Description
Timor/Crawney Residents	25 Community members in attendance. Follow up emails with sharing minutes and answering community questions.	17 April 2021: BBQ with residents of the Timor/Crawney community including a presentation and Q&A session. The Project team provided written responses to questions that required technical responses following this meeting.
Hills of Gold Preservation Inc.	1 face-to-face meeting	4 May 2021: Meeting with members to discuss concerns raised through public exhibition and introduce members of the ENGIE Project Team. Broad aspects of the Project were discussed. Members of the group were present at the meeting of CCC members mentioned above.
Nundle Tourism and Business Marketing Group	1 face-to-face meetings	4 May 2021: Meeting with members to discuss concerns affecting businesses in the Nundle and Hanging Rock area, particularly focused on impacts of traffic and transport and existing tourism operators. Members of the group were present at the meeting of CCC members mentioned above.
Friends of the Wind Farm	3 face-to-face meetings	11 January 2021 BBQ with members of the association to provide an update on the Project and respond to queries. A set of meeting actions were provided by residents and the project provided responses. 18 January 2021 BBQ: A meeting with project supporters at the Nundle Bowling and Recreation Club. 4 May 2021: Meeting with members to introduce members of the ENGIE Project Team and to provide a Project update with Q&A session.
Local Businesses	30 emails 43 phone calls	A business survey was sent to Nundle and Hanging Rock business owners on the 10 th of August who operate shop fronts or businesses out of their home. At the completion of the survey, 53 responses were received, there were several agricultural businesses who submitted a survey, which accounts for the larger number of submissions. When looking at the 53 responses, there were 61.5% of businesses in support and 38.5% of businesses not supportive of the Project. When reviewing the data and identifying, which businesses have an ABN and a shopfront in Nundle, there is 66.7% support and 33.3% not supportive businesses. 67% of respondents supported one or more of the transport amendments made as a result of earlier consultation. The dedicated route to use Barry Road and avoid residential parts of Nundle and a temporary car park received the strongest support. Follow up calls and meeting were held with businesses that indicated interest in more Project information.
Transport Update	22 emails 4 phone calls	Email campaign to all residents on Morrisons Gap Road and Shearers Road residents. Further to the email existing safety concerns were along Morrisons Gap Road were raised by residents. Consultation with businesses along the transport route through business survey. 90% of businesses directly along the transport route expressed support for the Project.

Stakeholder	Interaction record	Description
		<p>The Project is committing to improved communication protocols, such as communication of the latest delivery schedules including expected component types, days and times and duration of deliveries will be provided to the local community. This will occur through:</p> <ul style="list-style-type: none"> ■ Website updates including fact sheets. ■ Community information boards within Nundle and Hanging Rock. ■ A text message service for those registered. ■ A permanent community hub will be established in Nundle during construction and a local person (from within the LGA where possible) will be employed to assist in providing information about the Project including transport delivery times to the community. ■ Provision of major activity notices to residents along Shearers Road and Morrisons Gap Road, one week in advance.
Biodiversity Stewardship Program	<p>3 face-to-face meetings</p> <p>Emails and phone calls</p>	<p>The Project has been investigating the potential for Biodiversity Stewardship Sites on land surrounding the Project to create a wildlife corridor between Ben Halls Gap Nature Reserve and Crawney Pass / Wallabadah Nature Reserve. There have been eight (8) landowners identified who could host a biodiversity stewardship site at present. The Project is seeking to enter into agreements with neighbouring landowners.</p>

A community information hub was set up in partnership with the local business Machina Coffee and Donuts from the 8 November 2021 with a morning session from 9am to 12pm and an afternoon session from 3pm to 6pm. The hub featured in Nundle on the 8, 9 and 10 November 2021 and then a session at the Timor Community Hall occurred on the 11 November 2021 between 10am-3pm. There was a second week of consultation which occurred on the 15, 16 and 17 November 2021 in Nundle.

The consultation hub was an opportunity to discuss key Project changes with the community and hand out fact sheets on areas of interest, which detailed updated information on the Project. Project representatives were available at the hub for community members and stakeholders to ask questions and free coffee and donuts were on offer for all who engaged.

There were approximately 50 community members who engaged with the hub over the course of the two weeks and the hub included COVID safe practices such as a sign-in sheet and social distancing.



Figure 4-2: Photograph of Community Information Hub, November 2021

During October and November 2021, the Proponent undertook a three-phased advertising campaign to bolster community engagement and increase Project awareness. The campaign included a combination of digital, print and radio advertising across key regional outlets and publications, with the aim to target a wide regional audience base and direct people in the community to the Hills of Gold Wind Farm website.

Print advertising was run in the Northern Daily Leader newspaper, with five advertisements across the two months. The average monthly readership of the Northern Daily Leader is 47,000. In conjunction with the print advertising, digital ads were also run on the Northern Daily Leader website. The Leader website has an average daily audience of more than 4,600 users. In total, the digital ads attracted just under 90,000 impressions and almost 600 click-throughs.

Two separate radio campaigns were run on two key North West regional radio stations – 92.9FM and 88.9FM. There were 42 ads run on 92.9FM, which has a total potential listener reach of 71,000. While 117 ads were run on 88.9FM, which has a total potential listener reach of 50,000.

The combination of digital, print and radio advertising contributed to a significant increased activity on the Hills of Gold Wind Farm website during the campaign period. Across October and November there was a 189 per cent increase in website sessions, with a 204 per cent increase in the number of users.

In addition, a combination of calls and meetings have been held with a number of businesses within Muswellbrook LGA affected by the proposed transport route, including:

- Maxwell Underground Mine;
- Mt Arthur Mine;
- New Hope Bengalla Mine;
- Mt Pleasant Mine;
- Mangoola Mine;
- Dartbrook Underground Mine;
- Coolmore Stud;
- Darley Woodlands Stud;
- Edenglassie Stud; and

■ Balmoral Stud.

These stakeholder engagement activities are recorded in the Stakeholder Engagement Register (refer to Appendix C).

4.4 Voluntary Neighbour Benefit Sharing Program

The Project announced the Neighbour Benefit Sharing program publicly through the Project website and an email campaign to website subscribers on the 9th of April 2020. Following this, neighbours within 5 km of the Project were contacted and consulted through emails and face to face meetings.

The program is designed based on guidelines such as:

- A Guide to Benefit Sharing Options for Renewable Energy Projects (Clean Energy Council, October 2019);
- Building Strong Communities, Wind's growing role in regional Australia (Australian Wind Alliance, 2019); and
- Neighbour Consultation and Agreements (Australian Energy Infrastructure Commissioner).

The Hills of Gold Wind Farm neighbour agreement has the following structure:

- \$1,500 sign on fee; and
- \$3,000 additional payment at the start of construction.

Annual payments which are indexed to CPI:

- \$1,500 annual payment for dwellings within 3-5 km;
- \$3,000 annual payment for dwellings within 2-3 km; and
- \$6,000 annual payment for dwellings within 0-2 km.

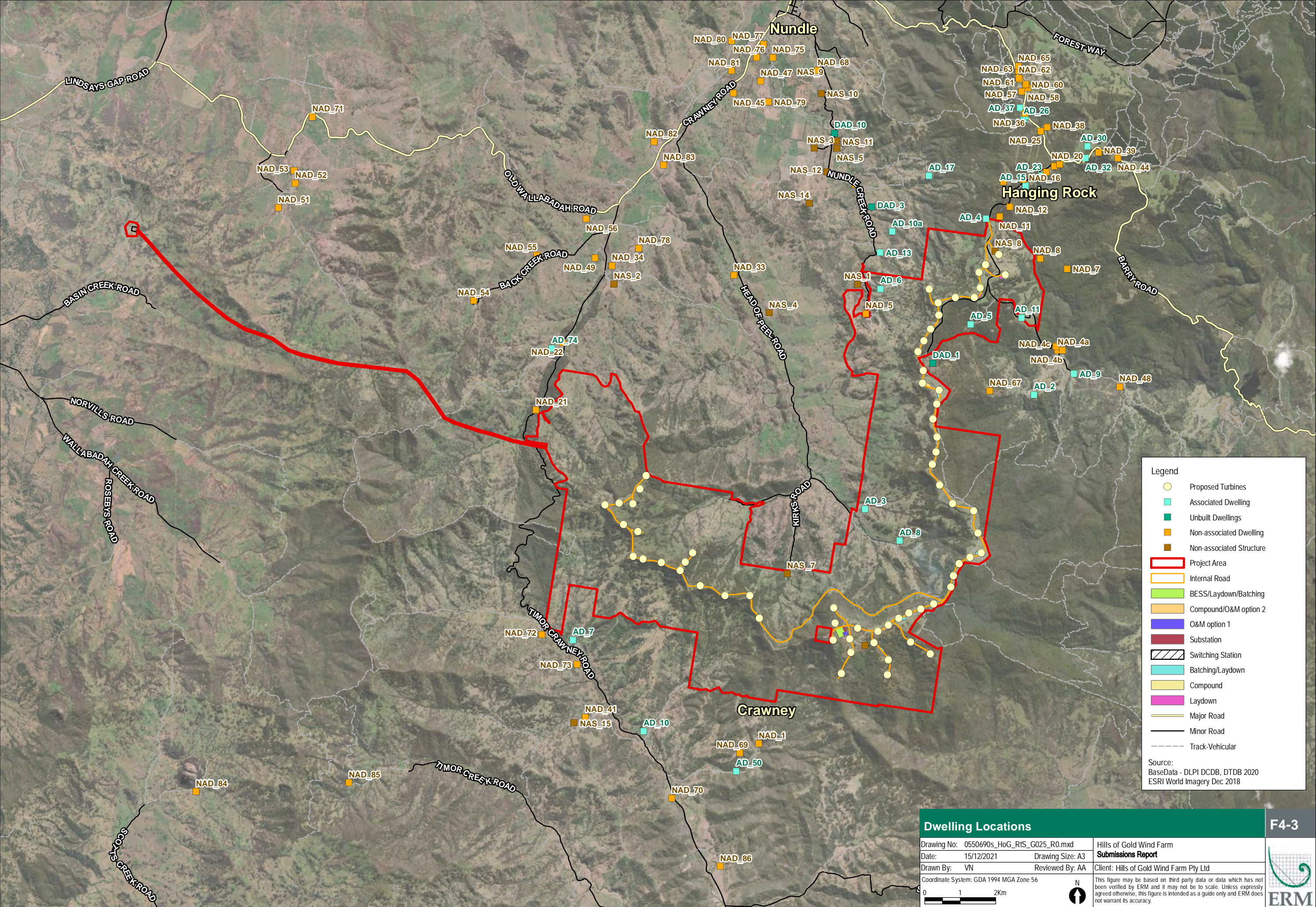
The Project has continued to engage with neighbours via face-to-face meetings and phone calls, and this ongoing consultation has secured seven (7) additional neighbour agreements since lodgement of the EIS.

There is still ongoing consultation with 26 neighbours regarding the program and the Project will continue working with neighbours to come to an agreement through the assessment period and subject to approval will continue to offer this to residents up until construction. The program was increased during the response to submission phase.

Table 4-3: Neighbour Agreement Status Update

Neighbour Agreement Status	No. of Neighbours
Signed before EIS	8
Signed Post EIS	7
In Consultation	26
Total Signed	15

Figure 4-3 presents the location of dwellings in the context of the Project Area.



4.5 Landscaping Program for Transport and Visual

Residents along Morrisons Gap Road and dwellings with moderate to high visual impacts have been advised of the opportunity to have vegetation screening provided if they elect. The program would provide optionality to residents to have the screening organised for them or to receive payment to complete it on their own behalf. There would be reference to distance away from turbines, which would help determine the level of screening commitments required.

For residents along Morrisons Gap Road who are interested in visual screening there has been interest in planting trees that are habitat for vulnerable birds in the area to improve the vegetation quality along the road, particularly after heavy snowfall in 2021 caused devastation of trees along the road.

4.6 Biodiversity Stewardship Sites

The Project has been in discussions with eight (8) landowners regarding establishing Biodiversity Stewardship Sites.

The program, which is regulated by the Biodiversity Conservation Trust, enables landholders to enhance existing high-quality habitat on their property to ensure long-term conservation is achieved.

There have been discussions with neighbouring landowners to the Project in securing land, which would facilitate a wildlife corridor between Ben Halls Gap National Park, Crawney Pass National Park and Wallabadah Nature Reserve.

4.7 Transport Licence Agreements

There have been detailed discussions held with all landowners to which either blade overhang or potential road upgrades would be required on private property along the transport route. The overwhelming majority of landowners required for upgrades or overhang on the transport route from the Port of Newcastle to the entrance to the Project site on Morrisons Gap Road have confirmed their support for the Project and none of the remaining landowners have made any submission objecting to the Project.

The Proponent confirms that no works will be carried out on any third-party land until and unless legal tenure is obtained, this includes for the road upgrades.

Negotiations remain ongoing with a minority of landowners who have not objected to the Project and have expressed interest in working with the Proponent to reach an agreement.

4.8 Project Refinements and Amendments

Since the completion of the EIS, further Project design and refinement has occurred to further reduce the impacts of the Project and address the key issues raised in the agency and community submissions, and the outcomes of ongoing additional engagement. The process undertaken from submissions review and additional stakeholder engagement through to identifying Project amendments and associated impact assessment is discussed in Chapter 2 above.

The Proponent engaged technical consultants to target potential amendments to the Project that would address concerns raised by agencies, community organisations and the public, including but not limited to key concerns relating to biodiversity, visual and traffic impacts. The refinements and amendments made to the Project are in direct response to concerns raised by agencies, community organisations and the public and will further minimise the impacts of the Project while ensuring it remains able to deliver key benefits in the broader public interest.

The key changes proposed to the Project are detailed in Table 4-4.

The Amendment Report provides a detailed assessment of the amendments made to the Project including the environmental, social and economic impacts of the amended Project. Overall, the Project amendments will result in reductions in the Development Footprint by approximately 213 ha,

resulting in materially reduced environmental impacts, including reduced biodiversity, visual, traffic, aviation and heritage impacts. The Amendment Report is available on the Major Projects portal: [Hills of Gold Wind Farm | Major Projects Planning Portal](#).

Table 4-4: Proposed Project Amendments

Project Amendment	Description, Justification and Outcomes	Reference in Amendment Report
Relocation of WTG 47	The amended Project incorporates the relocation of WTG 47 by approximately 209 m to the north east of the exhibited location. WTG 47 has been relocated to reduce the extent of required vegetation clearing and earth works on steeper slopes during construction, thereby reducing biodiversity impacts.	Figure 3-1a
Relocation of WTG 50	WTG 50 has been relocated by approximately 137 m to the north - east of the exhibited location, and the existing hardstand area proposed has been reoriented to avoid impacts to the bat habitat buffer area, thereby reducing biodiversity impacts.	Figure 3-1a
Modification of Hardstand for WTG 2	The hardstand area location has been optimised to avoid direct native vegetation and associated habitat clearing.	Figure 3-1
Modification of Hardstand and Location WTG 12	WTG 12 has been relocated by approximately 50 m to reduce the extent of required earthworks and cut to fill extents, thereby reducing biodiversity impacts.	Figure 3-1
Removal of WTG 19	WTG 19 has been removed to reduce the visual impact to non-associated dwelling 69. The hardstand road required to access this turbine has been removed, with further biodiversity benefits.	Figure 3-1a
Removal of WTG 23	WTG 23 has been removed to reduce the visual impact to non-associated dwelling 69, the risk of impact to bat habitat and Koala habitat, reduce significant bulk earth works associated with hardstands and associated roads and therefore reduce biodiversity impacts.	Figure 3-1a
Removal of WTG 1	WTG 1 has been removed due to direct impacts associated with native vegetation and indirect impacts to fauna, in particular bats, Koalas, and Greater Gliders. This further reduces visual impacts associated with dwellings in the Upper Hunter Shire Council region. The road required to access this turbine has also been removed, further reducing biodiversity impacts.	Figure 3-1a
Removal of WTG 27	WTG 27 has been removed to reduce risk of indirect impacts to bat habitat, reduce native vegetation impacts and associated indirect fauna impacts. The removal of this turbine further reduces visual impacts associated with to non-associated dwelling 69 and other dwellings on the Upper Hunter Shire Council (UHSC). The road required to access this turbine has also been removed, further reducing biodiversity impacts.	Figure 3-1a
Removal of WTG 31	WTG 31 has been removed to reduce risk of indirect impact to bat habitat and reduce biodiversity impacts. The UHSC requested that this turbine was removed. The road required to access this turbine has also been removed, with further biodiversity benefits.	Figure 3-1a

Project Amendment	Description, Justification and Outcomes	Reference in Amendment Report
Monitoring Masts at WTG Location prior to WTG Installation	Decommissioning of three current monitoring masts and installation of up to 10 additional monitoring masts for power testing. The five additional temporary masts to those proposed in the EIS have been assessed as part of this Amendment Report and will be located at a WTG location with a maximum height of approximately 150 m AGL, equivalent to the hub height of the final selected WTG model. All temporary masts proposed will be placed on the same location as an approved WTG prior to its installation and removed shortly before WTG installation.	The exact number and location will be defined at the detailed design stage.
Minor Transmission Line Realignment	A portion of the transmission line within the Project Area, to the north of WTG 12 and west of WTG 2, has been realigned to reduce vegetation clearing during construction, thereby reducing biodiversity impacts.	Figure 3-1
Reduced removal of transmission vegetation	Portions of the vegetation previously assessed to be removed for transmission line has been reassessed by AECOM based on further refinements made to the design and to identify native vegetation that can remain, thereby reducing the amount of vegetation to be cleared and reducing impacts on biodiversity.	Considered in updated BDAR, Appendix D of the Amendment Report.
Internal Access Track Realigned and Modified as Emergency Access Only	<p><u>Access Track realignment</u></p> <p>Sections of access track have been realigned to reduce the construction footprint and avoid biodiversity impacts. These sections are located between:</p> <ul style="list-style-type: none"> ■ WTG 16 to 17 ■ WTG 17 to 18 ■ WTG 46 to 48 ■ WTG 66 to 67 <p>Access Track</p> <p>The internal road from the Project Area near the southern end of Head of Peel Road into the western area of the Project Area has been modified and will now be used for emergency access only which reduces impacts to biodiversity, vegetation clearing and earthworks. This results in an overall reduction in disturbance footprint of approximately 20 hectares.</p>	Figure 3-1
Traffic Access to Project Area	All Project traffic will now access the Project Area via Morrisons Gap Road only. The Head of Peel Road is no longer proposed to be used for Project related construction and operational traffic and will be for emergency use only. As a result, the road upgrades and associated clearing previously proposed along the Crawney Road / Head of Peel access route ('Southern Route') will not be undertaken.	Figure 3-1c
Transport Route Updates	<p>The transport route for OSOM from the Port of Newcastle to the Project Area has been amended by the following:</p> <ul style="list-style-type: none"> ■ removal of the tower route option via Tamworth; ■ removal of the Head of Peel Road route ('Southern Route') (as stated above) and associated alternate routes through Nundle including Happy Valley Road, Jenkins St, Gill St and Innes St; ■ some private land previously identified as being required for upgrades proposed along Morrisons Gap Road has also now been confirmed as no longer being required and so has been removed from the Project; ■ inclusion of route optionality in Muswellbrook; ■ additional laybys for OSOM traffic on Lindsay Gap Road and Morrisons Gap Road, to make a total of five 	<p>Figure 3-1</p> <p>Updated Project Description in Appendix A</p> <p>Updated Transport Route Assessment in Appendix I of the Amendment Report</p>

Project Amendment	Description, Justification and Outcomes	Reference in Amendment Report
	<p>proposed laybys on the transport route for the Project, to allow existing road users to pass slower moving Project traffic; and</p> <ul style="list-style-type: none"> ■ addition of a pedestrian crossing and temporary construction car park in Nundle subject to further consultation with Tamworth Regional Council. <p>The benefits of these amendments include significantly reduced biodiversity impacts, reduced impacts of Project OSOM vehicles passing through residential town areas, and reduced traffic impacts of OSOM vehicles to public road users.</p>	
Devil's Elbow Bypass Road Optimisation	<p>The Devil's Elbow Bypass Road has been optimised to further reduce and avoid heritage and biodiversity impacts.</p> <p>The EIS incorporated a Historic Heritage Impact Assessment and Statement of Heritage Impact (SoHI) (ERM, 2020) (Appendix N of the EIS). The SoHI confirmed that the Devil's Elbow bypass as detailed in the EIS would have a negligible impact on the setting of the LEP listed Black Snake Gold Mine, but would have the potential to impact archaeological features, such as potential mine shaft entries and tunnels. The assessment recommended a geophysical and / or geotechnical assessment be undertaken to determine if there are any subsurface voids beneath the proposed upgrade or other anomalies that may be indicators of archaeological features.</p> <p>In line with this recommendation, the <i>Devil's Elbow Bypass Road – Geophysical Interpretative Report</i> (Coffey, 2021) (provided in Appendix O of the Amendment Report) used electrical resistivity testing in March 2021 to assess potential for subsurface voids relating to abandoned mine workings, and other possible anomalies that may indicate the presence of archaeological features.</p> <p>The investigation identified three resistivity anomalies (referred to as Areas 1, 2 & 3). While it is possible that these areas are the result of natural geological processes unrelated to the Black Snake Gold Mine, it is considered they are likely to be associated with abandoned (historic) mine workings such as tunnels. Based on Coffey's extensive tunnel design experience it is expected that these potential tunnel areas would be very unlikely to be structurally impacted by road excavation so as to cause any subsidence or collapse provided that they have at least 5 m of sound rock cover and span less than 4 m and measures such as heavy blasting are avoided.</p> <p>Based on the outcomes of the geophysical assessment (Coffey, 2021) Catcon and WGA (Wallbridge Gilbert Aztec) redesigned and realigned the road such that the potential void locations identified are limited to within areas of fill so as to avoid the risk of removing earth support. The realigned and redesigned bypass road is identified in Figure 3-1c. A number of structural engineering solutions have been recommended by Coffey to ensure structural integrity of any subsurface voids in proximity to the works, and these will be confirmed during detailed design where necessary.</p> <p>In addition, the SoHI was updated to include assessment of indirect impacts following a request from Tamworth Regional Council (ERM, 2021) The findings of the Updated SoHI (provided in Appendix Q to the Amendment Report) confirm that the road works will have no impacts on the listed heritage values of the former Black Snake Gold Mine.</p> <p>Impacts associated with the exhibited Project footprint in the EIS at Devil's Elbow comprised approximately 17 ha of</p>	<p>Figure 3-1 Geophysical Assessment in Appendix O Updated Turnbull Engineering Designs Appendix P</p>

Project Amendment	Description, Justification and Outcomes	Reference in Amendment Report
	native vegetation generally in high condition. Selection of a proposed route (from the larger potential area identified in the 17 ha) and substantial design revisions have reduced this impact to 2.5 ha of native vegetation removal, leading to direct and indirect benefits to previously impacted vegetation and habitats in this area. This includes avoidance of Box Gum Woodland Critically Endangered Ecological Community and habitat for Koala.	
Ancillary Infrastructure Amendments	Relocation of laydown and batching plant at top of Head of Peel Road As a result of the removal of the Head of Peel access to the Project Area, the construction laydown area and batching plant at the top of the Head of Peel Road access route has been relocated to the footprint of the BESS / substation. This amendment will result in no additional environmental impacts.	Figure 3-1b
	Substation, BESS and O&M configuration Following further substation design works, the configuration of the BESS, substation and O&M facility has been slightly amended to accommodate changes in size to the substation. The overall area of these facilities remains the same and will result in no additional environmental impacts.	Figure 3-1
	Optionality of O&M to between WTG 55 and WTG 56 Based on feedback in the Hazards and Risk Report a second siting option for the operations and maintenance facility has been included between WTGs 55 and 56. Both options would have the same footprint area. Only one O&M location will be constructed and this amendment will result in no additional environmental impacts.	Figure 3-1
	Laydown Area and Concrete Batching Plant Optionality Inclusion of the option for any laydown area (with the exception of laydowns along Morrisons Gap Road) to host the two temporary concrete batching plants required for construction. This amendment will result in no additional environmental impacts.	Figure 3-1
	Additional Temporary Construction Compound location An additional temporary construction compound location is proposed adjacent to WTG 56 to optimise efficiency and safety of project construction. This amendment will result in no additional environmental impacts.	Figure 3-1
Refinements to Morrisons Gap Road Upgrades	Some private land previously identified as being required for road upgrades proposed along Morrisons Gap Road has also now been confirmed as no longer being required and so has been removed from the Project to reduce private landholder impacts. The proposed road upgrades along Morrisons Gap Road also widen sections of the existing narrow road to improve safety conditions along the road for local residents, in response to feedback received from residents along this route.	Appendix B
Aviation Night Lighting Plan	Aviation night lighting impacts led to further consultation with CASA, an agreed reduced night lighting plan from 70 turbines to 28, lower intensity night lighting and a commitment to install light shielding.	Appendix J of the Amendment Report.

Project Amendment	Description, Justification and Outcomes	Reference in Amendment Report
Biodiversity Stewardship Sites	<p>There have been eight (8) neighbouring landowners identified who could potentially host a biodiversity stewardship site to deliver a wildlife corridor.</p> <p>Biodiversity stewardship sites will be established in accordance with legislative requirements.</p> <p>The potential for establishing a wildlife corridor between Ben Halls Gap Nature Reserve and Crawney Pass / Wallabadah Nature Reserve as part of the biodiversity stewardship sites will be investigated.</p> <p>This wildlife corridor could provide enhanced connectivity between three NSW State Nature Reserves or National Parks including Ben Halls Gap Nature Reserve, Crawney National Park and Wallabadah Nature Reserve.</p>	Figure 3-1

4.9 Further Technical Assessment of Project Impacts

To address issues raised by government agencies, DPIE, and community submissions, and to update the environmental assessments based on the refinements and amendments to the Project, the further technical assessments identified in Table 4-5 have been completed since the EIS and are attached to the Amendment Report:

Table 4-5: Further Technical Assessment of Project Impacts

Assessment / Section of EIS	Key Change / Update	Location Addressed
Environmental Management	Updated Management and Mitigation Measures, inclusive of Project amendments.	Appendix C of the Amendment Report
Revised Biodiversity Development Assessment Report (BDAR)	Updated BDAR report for the following amendments: <ul style="list-style-type: none"> ■ Calculation of Plant Community Type (PCT) and species impact ■ Revised/additional Biodiversity Assessment Method (BAM) plots ■ Design phase mitigation measures ■ Incorporation of NPWS and DPIE BCD responses ■ Microbat refinement fieldwork ■ Additional bat analysis ■ Microbat polygon refinement ■ Turbine blade strike impact risk assessments (microbats) ■ Impact to large forest owls ■ Geomorphologist input 	Appendix D of the Amendment Report
Biodiversity Offset Strategy	A Biodiversity Offset Strategy has been prepared for the Project outlining how the Project will achieve its offset obligations.	Appendix E of the Amendment Report
Noise and Vibration	NVIA Submissions advice letter responding to noise related submissions from the EPA and community. Comments to reflect relocation of WTG 47 and optionality for the concrete batching plant locations and O&M facility, and inclusion of a construction compound.	Appendix D of this Submissions Report Appendix F of the Amendment Report
Landscape and Visual Impact Assessment (LVIA)	Addendum to Landscape and Visual Impact Assessment considering relevant Project amendments and inclusive of additional dwelling assessments.	Appendix G of the Amendment Report
Transport and Traffic Addendum Report	Transport and Traffic Addendum Report to reflect amendments to the Project, including additional traffic management and movement surveys, amended transport routes, and removing option of Head of Peel Road access route.	Appendix H of the Amendment Report
Updated Route Assessment	Updated Route Assessment including changes to the OSOM vehicle transport route and inclusion of optionality.	Appendix I of the Amendment Report
Aviation	Aviation advice letter assessing relevant Project amendments. Obstacle lighting plan and correspondence with CASA.	Appendix J of the Amendment Report

Assessment / Section of EIS	Key Change / Update	Location Addressed
Bushfire Assessment	Updated Bushfire Assessment Report to account for comments from NPWS and address Project amendments.	Appendix K of the Amendment Report
Preliminary Hazard Assessment (PHA)	Preliminary Hazard Analysis: <ul style="list-style-type: none"> Impacts of blade and ice throw on the BESS; and Review of BESS design. 	Appendix L of the Amendment Report
Heritage	Indigenous Heritage advice letter to address proposed Project amendments. Statement of Heritage Impact (SoHI) Addendum further considering historic heritage impacts associated with Project amendments, primarily relating to Devil's Elbow design options and potential impacts to the Black Snake Mine.	Sections 6.8 and 6.9 and Appendices M and Q of the Amendment Report
Water and Soils	Soils and Water Addendum Report providing additional information and incorporating geotechnical assessment outcomes.	Appendix N of the Amendment Report
Preliminary Geophysical Report (Coffey, March 2021)	Initial site geophysical investigations including Land Seismic Refraction (LSR), Multichannel Analysis of Surface Wave (MASW) and Earth Resistivity Testing (ERT) to assess subsurface conditions in the vicinity of the Devil's Elbow bypass road and the former Black Snake Mine.	Appendix O of the Amendment Report
Engineering Design	CATCON, WGA and Turnbull Engineering updated concept design options on Devil's Elbow, Morrisons Gap Road and key intersections.	Appendix P of the Amendment Report (providing concept designs, subject to further refinement during detailed design)
Capital Investment Value	Response letter addressing community comments relating to the capital investment value report	Appendix E of this Submissions Report
Socio Economic	Response letter addressing community comments relating to the socio economic assessment and updates to the job calculations on revised layout. Updated Socio-Economic Assessment to account for Project Amendments.	Appendix F of this Submissions Report Appendix R of the Amendment Report

These updated technical assessment reports are further supplemented by specific responses to comments and issues raised in the agency and community submissions as detailed in Chapters 5 and 6 and Appendix B of this Submissions Report.

5 RESPONSES TO GOVERNMENT AGENCY SUBMISSIONS

As noted in Section 3.1, a number of NSW Government agencies provided comments on the EIS:

Of the government agency submissions received, NSW Department of Regional NSW, MEG Division, and Forestry Corporation of NSW supported the Project, Tamworth Regional Council and Muswellbrook Shire Council objected to the Project, and all other agencies submitted comments.

Each of the matters raised by these agencies have been addressed in Table 5-1 to Table 5-22 inclusive.

Table 5-1: Department of Planning, Industry and Environment (DPIE) Submission Responses

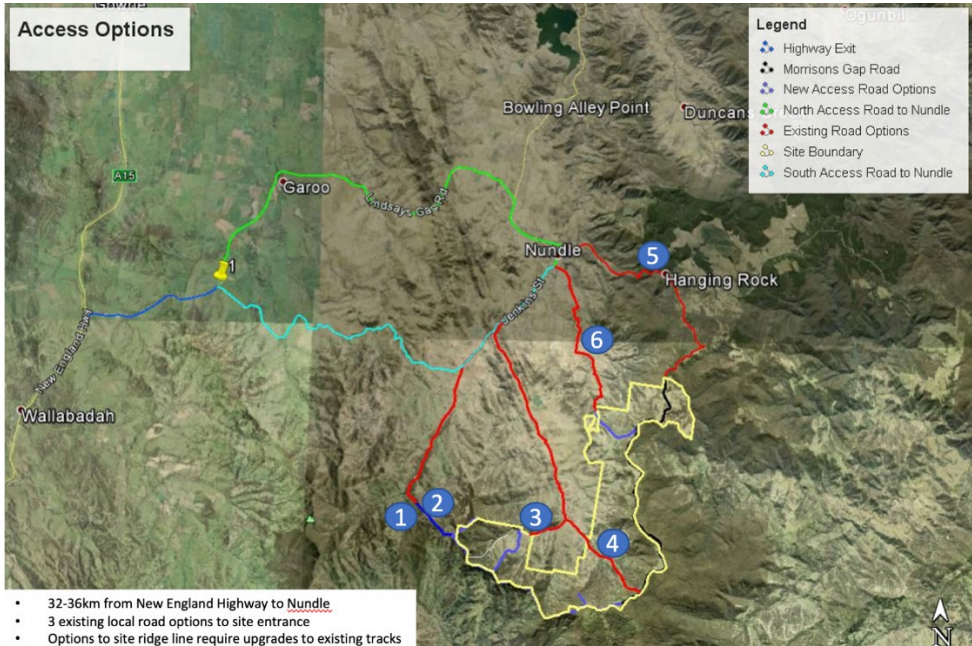
Reference No.	Theme	Submission	Response
DPIE_1	Blade throw risk	<ul style="list-style-type: none"> Clarify the units of measure for “Recommended Value” in Table 3-1. Are numerical values for “Loss of entire blade” and “Loss of a blade tip” in terms of a single blade or blade tip in a turbine, or in terms of the entire turbine? 	<ul style="list-style-type: none"> In response to DPIE's submission on this subject, a meeting was held with DPIE hazards team on 9 March 2021 relating to the hazards comments raised by DPIE. The outcomes of the meeting were the requirements for the preparation of a Preliminary Hazard Analysis (PHA). A Preliminary Hazard Analysis has been completed and is provided in Appendix L of the Amendment Report and assesses each of these items. Based on the outcome of the assessment the Project Amendment Report has incorporated optionality for the location of the O&M within the compound between WTG 55 and WTG 56 (Option 2), in response to the findings of the PHA.
DPIE_2		<ul style="list-style-type: none"> Verify the number of turbines within 150 m, 800 m and greatest wind tower height (230 m) from the designated area. 	
DPIE_3		<ul style="list-style-type: none"> Use item 2 (DPIE_2) above to estimate the cumulative risk of blade throw, blade fragment throw and entire tower collapse to the designated area, respectively. 	
DPIE_4		<ul style="list-style-type: none"> Consider options to reduce the cumulative risks to the designated area, such as relocating the designated area or wind turbines. 	
DPIE_5a	BESS-related risks	<ul style="list-style-type: none"> Please append a PHA (EIS Appendix L) with the following considerations, ensuring that the PHA will be consistent with the Department's Hazardous Industry Planning Advisory Paper No. 6, 'Hazard Analysis': Include the findings from EIS Appendix K and items A1 to A4 above in all relevant sections in the PHA, including and not limited to Table 3-2. 	
DPIE_5b		<p>a) Analyse the consequences of blade throw, blade fragment throw and entire tower collapse to the designated area (fire/explosion?).</p>	
DPIE_5c		<p>b) Assess if locating the O&M area within the areas of blade throw, blade fragment throw and entire tower collapse (where appropriate) could impact on-site emergency response capabilities.</p>	
DPIE_5d		<p>c) Consider recent developments into research and standards for BESS. Of particular note (not exhaustive) are:</p> <ul style="list-style-type: none"> NFPA 855; AS 5139; IEC 62897; UL 9540; UL 9540A; FM Global DS 5-33; and FM Global's Development of Sprinkler Protection Guidance for Lithium Ion Based Energy Storage Systems. 	<p>Section 6 of the PHA considers several Australian and International Standards including:</p> <ul style="list-style-type: none"> NFPA 855: Standard for the Installation of Stationary Energy Storage Systems AS/NZS 5139: Electrical Installations - Safety of Battery Systems for use with Power Conversion Equipment IEC 62897: ED1 Stationary Energy Storage Systems with Lithium Batteries - Safety Requirements IEC 62933 Series UL 9540: Energy Storage System (ESS) Requirements UL 9540A: Test Method for Evaluating Thermal Runaway Fire Propagation in Battery Energy Storage Systems FM Global Property Loss Prevention Data Sheet 5-33: Electrical Energy Storage Systems FM Global's Development of Sprinkler Protection Guidance for Lithium Ion Based Energy Storage Systems IEEE Std 2030.2.1-2019: Guide for Design, Operation, and Maintenance of Battery Energy Storage Systems, both Stationary and Mobile, and Applications Integrated with Electric Power Systems EI Battery Storage Guidance Note 1: Battery Storage Planning EI Battery Storage Guidance Note 2: Battery Energy Storage System Fire Planning and Response EI Battery Storage Guidance Note 3: Design, Construction and Maintenance All the publications offer useful information on the safety requirements for battery energy storage systems. For the purposes of land use planning safety, NFPA 855 and FM Global DS 5-33 are most applicable. An assessment of the Project BESS against NFPA 855 has been conducted and the results shown in Appendix A of the PHA (Appendix L of the Amendment Report).

Reference No.	Theme	Submission	Response
DPIE_6		<p>Where certain aspects of the scope or requirements from the above publications may not align exactly, reasonable best practice should be considered in the design of the BESS while considering the principles from these publications. Of particular importance are separation distances between:</p> <ul style="list-style-type: none"> ■ BESS sub-units, ensuring that a fire from a sub-unit do not propagate to neighbouring sub-units; and ■ the overall BESS and other onsite and offsite receptors, ensuring fire safety. <p>In noting that the final design of the BESS may not have been decided by the Applicant at this stage, the PHA above should verify if the proposed BESS capacity would be able to fit within the designated area for BESS, considering the spatial requirements for the separation distances above.</p>	<p>Where gaps have been identified against the standard, the PHA has made a number of recommendations. The PHA recommends a separation distance of 3.05 m (10 ft) between adjacent containers, based on the requirements of NFPA 855, as additional separation distances are not warranted by the explosion noting the BESS will still fit within in area identified, noting the 20 m setback for the bushfire APZ (refer section 8 of the PHA) (Appendix L of the Amendment Report).</p>
DPIE_7		<p>In view of items 1 to 4 (DPIE_5a to DPIE_6) above, assess if the SSD can comply with the Department's <i>Hazardous Industry Planning Advisory Paper No. 4, 'Risk Criteria for Land Use Safety Planning'</i>.</p>	<p>Section 7 of the Preliminary Hazard Analysis (refer Appendix L of the Amendment Report) includes a comparison of the risk analysis with the NSW <i>DPIE Hazardous Industry Planning Advisory Paper No. 4, 'Risk Criteria for Land Use Safety Planning'</i>. This included analysis of individual fatality risk criteria, injury risk criteria, risk of property damage and accident propagation and societal fatality risk criteria. Findings of the analysis are:</p> <ul style="list-style-type: none"> ■ Individual fatality risk criteria: Potentially hazardous consequences, and/or fatality risks greater than the corresponding risk criterion value, are not reached at these land uses for hazards associated with the wind turbines, BESS and electrical systems (refer to Section 5 of the PHA). ■ Injury risk criteria: Potentially hazardous consequences (viz. >4.7 kW/m2 or >7 kPa) are not reached at these land uses for fire / explosion hazards associated with the wind turbines, BESS and electrical systems (refer to Section 5 of the PHA). Potentially hazardous consequences are not reached at these land uses for fire hazards associated with the wind turbines, BESS and electrical systems (refer to Section 5 of the PHA). ■ Risk of property damage and accident propagation: Potentially hazardous consequences (viz. >23 kW/m2 or >14 kPa) are not reached at these land uses for fire / explosion hazards associated with the wind turbines, BESS and electrical systems (refer to Section 5 of the PHA). ■ Societal fatality risk criteria: The maximum cumulative risk of impact due to blade throw, tower collapse or nacelle collapse for WTG No. 60, 61, 62, 64, 65 and 66 is approximately 0.06 pmpy at the closest residence (AD_5) (refer to Section 5.1.1.3 of the PHA). This low frequency, combined with the low population density, ensures compliance with the 'Indicative Societal Risk Criteria'. <p>The assessment concluded that the Project complies with all risk assessment criterion. Please refer to Appendix L of the Amendment Report for more detail.</p>
DPIE_8	Approved dwellings (DADs)	<p>During ongoing consultation with DPIE following exhibition of the EIS and in response to community concerns, DPIE requested further assessment of impacts associated with dwellings that have sought or received development approval (whether via development consent or complying development certificate), but have not yet been constructed.</p>	<p>The following development approved dwellings (DADs) (ie unbuilt approved dwellings) have been identified by DPIE as requiring further impact assessment: DAD 1, DAD 2, and DAD 3. The approved locations of these DADs can be found on Figure 1-2.</p> <p>These are approved dwelling locations only which have not yet been constructed. As such, they do not currently form part of the Project "environment" required to be assessed by the consent authority for the purposes of the EP&A Act. Consequently, any potential and theoretical impacts should be given very little, if any, weight.</p> <p>Nevertheless, in response to DPIE's request and in consultation with the relevant landowners, ENGIE engaged further visual and noise impact assessment for each DAD. ENGIE has also continued to consult with the landowners regarding potential impacts and mitigations. DAD 2 was included in the additional assessments. However, following consultation, ENGIE and the landowner have successfully entered into a neighbour agreement. The focus of the further impact assessments and commentary below is therefore on DAD 1 and DAD 3.</p> <p>The visual impact assessment for the three DADs can be found in Appendix C of the Addendum LVIA (Appendix G of the Amendment Report). The assessments were undertaken in accordance with the study methods outlined in Section 6.4, and with reference to relevant guidelines.</p> <p>The noise impact assessment for the three DADs can be found in Appendix A of the Noise Impact Assessment Addendum Letter (Appendix F of the Amendment Report).</p> <p>A summary of engagement by the Proponent with each DAD is set out below, as well as a summary of the development approval for the dwelling and the impacts assessed.</p>

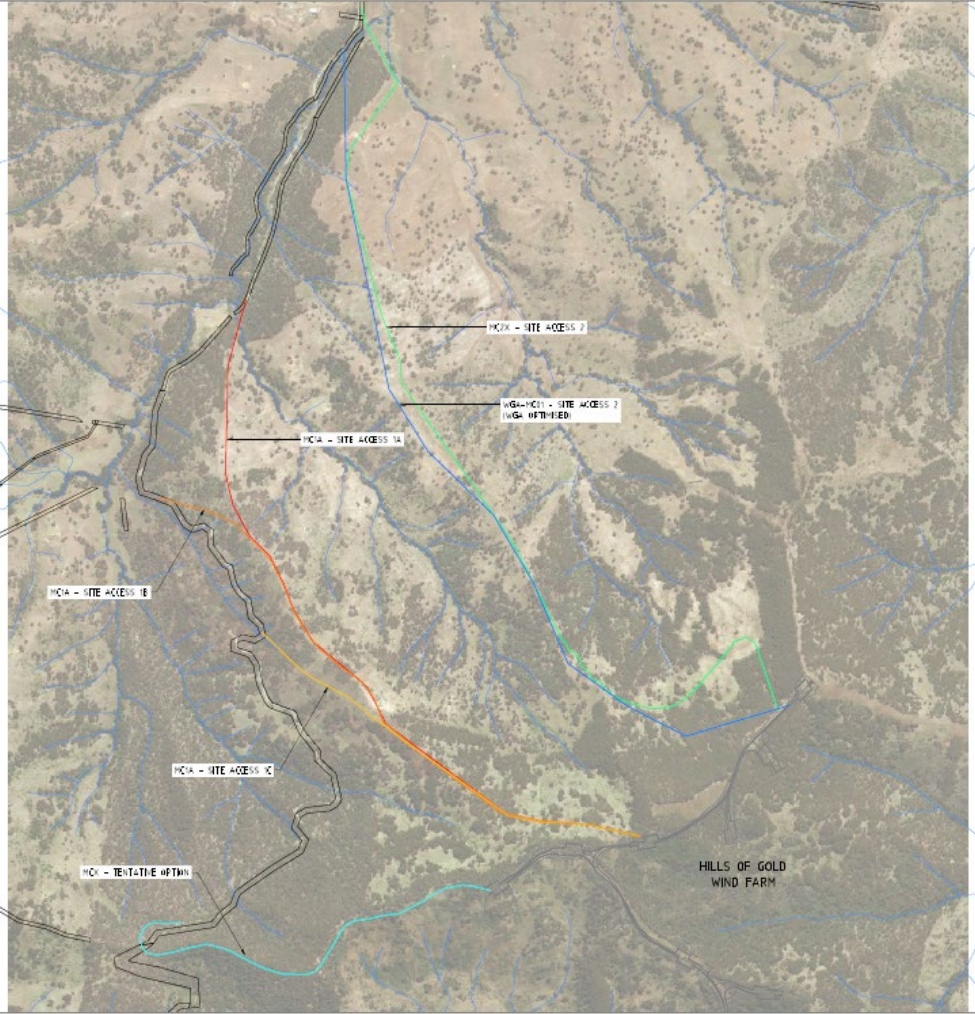
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			<p>DAD 1:</p> <ul style="list-style-type: none">■ The Proponent has consulted with the landowner from 2017 on the proposed wind farm and turbine layout and continues to do so. <p>Existing dwelling (NAD 67)</p> <ul style="list-style-type: none">■ The existing dwelling on Lot 46 DP 753722 is identified as NAD 67 and was assessed as part of the Environmental Impact Statement (EIS). A desktop visual assessment was undertaken for this dwelling which identified that although within close proximity to the Project, the majority of turbines are screened by topography. The assessment noted: “based on topography, it is likely 10 turbines will be visible to the north, the closest visible turbine is 2.39 km from the dwelling. Due to the elevated position and orientation of the dwelling, opportunities to mitigate the visual impacts from this dwelling are limited. Screen planting near the dwelling to the north may reduce the visibility of turbines whilst maintaining desirable views across the valley to the north east”. <p>Proposed dwelling (DAD 1)</p> <ul style="list-style-type: none">■ The landowner submitted a development application for a residential dwelling on Lot 47 DP 753722 which was refused by Council in October 2019. In November 2020 (the same month that the Proponent submitted the Project EIS to DPIE), a private certifier issued a Complying Development Certificate for the demolition of the existing dwelling on Lot 46 DP 753722 and construction of a new dwelling on Lot 47 DP 753722. Given the timing and that no construction has commenced to date, impacts on DAD 1 were not originally assessed.■ If constructed in accordance with the CDC location, the proposed new dwelling would be 330 m from the nearest turbine and within 3.1 km of 18 proposed turbines. Impact assessment has now been undertaken at this location and the results are summarised further below. <p>Consultation summary</p> <ul style="list-style-type: none">■ Originally, consultation contemplated the NAD 67 (and now DAD 1) landowner being a host landowner. Following the termination of this option by the landowner, the Proponent made the landowner a formal offer to host turbines, or, in the alternative, an owner-led option for the Proponent to purchase the land at above market value. Neither of those offers were taken up by the landowner. The Proponent acknowledges the importance of continued consultation and has continued to update the landowner on project developments and endeavored to discuss impacts and mitigation. The Proponent has recently made a further offer to the landowner in 2021. <p>The following consultation has been undertaken with the landowner to date:</p> <table><tr><th>Date</th><th>Method</th><th>Content of Communication</th></tr><tr><td>December 2021</td><td>Email</td><td>Updated commercial offer sent to Landowner for consideration</td></tr><tr><td>October 2021</td><td>Email</td><td>Following up visual assessment at dwelling Response to visual assessment and questions regarding wireframes and photomontages</td></tr><tr><td>September 2021</td><td>Email</td><td>Following up visual assessment at dwelling</td></tr><tr><td>August 2021</td><td>Site Visits and Emails</td><td>Organising Visual Assessment and Photomontages and site visit by consultant</td></tr><tr><td>May 2021</td><td>Community Meeting</td><td>Discussions held directly with landowner during HOGPI meeting</td></tr><tr><td>October 2020</td><td>Email</td><td>Landowner notifying the proponent they will not be signing the neighbour agreement. Requesting to remove turbines within three km of existing residential dwelling (note, no reference to the proposed dwelling).</td></tr><tr><td>October 2020</td><td>Email</td><td>Offer to meet landowner to discuss outcomes of EIS on property prior to lodgment.</td></tr></table>	Date	Method	Content of Communication	December 2021	Email	Updated commercial offer sent to Landowner for consideration	October 2021	Email	Following up visual assessment at dwelling Response to visual assessment and questions regarding wireframes and photomontages	September 2021	Email	Following up visual assessment at dwelling	August 2021	Site Visits and Emails	Organising Visual Assessment and Photomontages and site visit by consultant	May 2021	Community Meeting	Discussions held directly with landowner during HOGPI meeting	October 2020	Email	Landowner notifying the proponent they will not be signing the neighbour agreement. Requesting to remove turbines within three km of existing residential dwelling (note, no reference to the proposed dwelling).	October 2020	Email	Offer to meet landowner to discuss outcomes of EIS on property prior to lodgment.
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			June 2020	Email	Offer to send noise experts back to undertake baseline noise modelling at property. Offer declined by landowner.
			June 2020	Email	Offer for Visual Assessment and Dwelling Assessment which was declined by the landowner. Preliminary visual impact assessment and noise assessment provided to landowner and recommendation to consider in any property planning.
			May 2020	Call	Discussion on aviation lighting impacts. Landowner stated they didn't want anyone on their property undertaking assessments. Discussion on noise assessment methodology with regard to background noise modelling.
			May 2020	Call	Neighbour Benefit Offer discussion
			December 2017- December 2019	Calls, emails, in person meetings and formal written offer	Negotiation to host wind turbines and project infrastructure. In January 2018, the Proponent made a formal offer in relation to hosting turbines on the property. Despite the Proponent progressing with the landowners lawyer and paying all legal costs, ultimately no agreement could be reached for hosting wind turbines. Following this being declined, the Proponent made a formal offer to purchase the property at an above-market value. This offer was also declined. The proposed layout was provided to the landowner during this period.
			<p>Impacts assessed on DAD1</p> <p>At the request of DPIE, the Proponent has assessed visual and noise impacts on the proposed new dwelling location.</p> <ul style="list-style-type: none"> Visual impact has been rated high with 18 turbines visible within 3.1 km and 4 x 60 degree sectors will have turbines within 8 km. The noise assessment has determined that the nearest 9 turbines would need to be removed to achieve a compliant layout based on the NSW Wind Energy: Noise Assessment Bulletin 2016. <p>The turbines identified to be removed in these impact assessments have some of the lowest assessed biodiversity impacts on the Project and require less overall disturbance to soils. Further, the Project is unviable without these turbines remaining in the Project layout, and in this case the benefits of the Project outlined in Section 7 would not be realised for the local community and NSW.</p> <p>Proponent's submission on DAD1:</p> <ul style="list-style-type: none"> Despite the history of engagement with the landowner of DAD 1, the Proponent is endeavouring to continue negotiations with the landowner regarding either a neighbour benefit agreement or the acquisition of the property by the Proponent. DAD1 has not been constructed and there is no current indication that it will be constructed (which would require the demolition of the landowner's existing dwelling). The Project's impacts to the potential amenity of the proposed DAD1 location are not so widespread that they should jeopardise the benefits to the community, the environment and the economy of the Project as a whole. It would be appropriate for the consent authority to address the impacts to the proposed DAD1 via conditions of consent having regard to the approach taken by the Department for other wind farm projects in NSW. <p>DAD 2 (NOTE: this is now an associated dwelling, referred to as AD_4):</p> <ul style="list-style-type: none"> The landowner lodged a development application (DA) for a dwelling on Lot 2 DP 712947 on 25 February 2021, after the close of public exhibition for the Project EIS. The development application was approved on 8 December 2021. No structure exists on Lot 2 DP 712947. The Proponent became aware that the owner of the property had plans to lodge a DA for a residential dwelling in late 2020. The Proponent has engaged actively and constructively with the landowner following exhibition of the Project's EIS regarding the proposed dwelling DAD 2. The Proponent has assessed visual and noise impacts on the proposed new dwelling location and the outcomes were provided to the landowner. The landowner did not submit an objection to the Project and following consultation of potential impacts assessed since public exhibition the landowner signed a Neighbour Agreement with the project in October 2021. 		

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			<p>DAD 3:</p> <ul style="list-style-type: none">■ The landowner lodged a DA on 11 October 2020. The application for a single story rural workers dwelling with cost of \$96,000 was approved by Tamworth Regional Council on 24 November 2021, after lodgment of the EIS. There is no structure on Lot 2 DP 1139717 at the time of writing this.■ The following consultation has been undertaken with the landowner: <table><tr><th>Date</th><th>Method</th><th>Content of Communication</th></tr><tr><td>September 2021</td><td>Emails</td><td>Providing visual assessment results undertaken to date to the landowner</td></tr><tr><td>August 2021</td><td>Site Visits and Emails</td><td>Organizing Visual Assessment and Photomontages and site visit by consultant</td></tr><tr><td>May 2021</td><td>Community Meeting</td><td>Discussions held directly with landowner during HOGPI meeting</td></tr><tr><td>September 2020</td><td>In Person Meeting</td><td>Discussion of neighbour benefit sharing program Landholder sought compensation for perceived aviation and soil impacts. Information was provided on these impacts.</td></tr><tr><td>June 2020</td><td>In personal Technical Consultation</td><td>Aviation Projects met with landowner on his property to assess Aviation Impacts.</td></tr><tr><td>June 2020</td><td>In personal Technical Consultation</td><td>MOIR Landscape visited proposed dwelling location on Lot 2/DP1139717 for visual assessment. Also visited current homestead. It was noted no dwelling application had been submitted at the time.</td></tr><tr><td>June 2020</td><td>Outgoing Email</td><td>Proponent offered a Visual Assessment and Dwelling Assessment.</td></tr><tr><td>May 2020</td><td>Outgoing email</td><td>Proponent offered an Aviation Assessment, consultant property visit and assessment.</td></tr><tr><td>May 2020</td><td>Outgoing email</td><td>Neighbour Benefit Offer written offer.</td></tr><tr><td>May 2020</td><td>Outgoing Call</td><td>Neighbour Benefit Offer discussion which has been declined.</td></tr><tr><td>January 2020</td><td>In Person Meeting</td><td>Discussion with landholder regarding noise assessment, concerns on agricultural aviation application.</td></tr><tr><td>2019-2021</td><td>CCC</td><td>The owner of this property attended all CCC meetings held on the project and regular updates provided during this time including proposed turbine layout and photomontages.</td></tr><tr><td>April 2018</td><td>In Person Meeting</td><td>Information on aerial baiting program. Running sheep historically. Concern over potential to apply fertilizer aially. Use of the area for Westpac helicopter. Heritage of Chinese gold races and aboriginal heritage. Concern over soil erosion from earth works.</td></tr><tr><td>February 2018</td><td>In Person Meeting</td><td>Background on land ownership. Concerns over impact on property value.</td></tr></table>	Date	Method	Content of Communication	September 2021	Emails	Providing visual assessment results undertaken to date to the landowner	August 2021	Site Visits and Emails	Organizing Visual Assessment and Photomontages and site visit by consultant	May 2021	Community Meeting	Discussions held directly with landowner during HOGPI meeting	September 2020	In Person Meeting	Discussion of neighbour benefit sharing program Landholder sought compensation for perceived aviation and soil impacts. Information was provided on these impacts.	June 2020	In personal Technical Consultation	Aviation Projects met with landowner on his property to assess Aviation Impacts.	June 2020	In personal Technical Consultation	MOIR Landscape visited proposed dwelling location on Lot 2/DP1139717 for visual assessment. Also visited current homestead. It was noted no dwelling application had been submitted at the time.	June 2020	Outgoing Email	Proponent offered a Visual Assessment and Dwelling Assessment.	May 2020	Outgoing email	Proponent offered an Aviation Assessment, consultant property visit and assessment.	May 2020	Outgoing email	Neighbour Benefit Offer written offer.	May 2020	Outgoing Call	Neighbour Benefit Offer discussion which has been declined.	January 2020	In Person Meeting	Discussion with landholder regarding noise assessment, concerns on agricultural aviation application.	2019-2021	CCC	The owner of this property attended all CCC meetings held on the project and regular updates provided during this time including proposed turbine layout and photomontages.	April 2018	In Person Meeting	Information on aerial baiting program. Running sheep historically. Concern over potential to apply fertilizer aially. Use of the area for Westpac helicopter. Heritage of Chinese gold races and aboriginal heritage. Concern over soil erosion from earth works.	February 2018	In Person Meeting	Background on land ownership. Concerns over impact on property value.
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			<div>Seeking to understand compensation for potential impacts.</div> <div>The Proponent has assessed visual impact on the property and the results are provided in Appendix G of the Amendment Report. The impact has been assessed as moderate with mitigation proposed to include visual screening. The property will not receive any shadow flicker hours. Noise assessment has been carried out and is provided in Annexure F of the Amendment Report. The proposed location of the dwelling is not expected to receive noise in exceedance of the guidelines. The Proponent commits to implementing the visual screening mitigation measures recommended in the LVIA Addendum (Appendix G of the Amendment Report) if the dwelling is constructed and, on that basis, does not consider that any additional measures are required to make the impacts of the Project acceptable at the location of the proposed DAD 3.</div>
DPIE_9	Visual	Consultation with DPIE post exhibition of the EIS identified a need for further assessment of visual impact to dwellings associated with Timor Crawney Road and Crawney Road (south west of the Project) (NAD_72, NAD_73, NAD_69, NAD_01) and additional consideration of visual impacts on the commercial function of NAD_34 (DAG Sheep Station) (wedding venue) and reconsideration to the visual impact rating applied to NAD_05.	<div>Further assessment of the receptors identified by DPIE has been undertaken, as well as those receptors identified in the LVIA presented in the EIS (MLA 2020) to have a moderate or high visual impact within 4,550 m of the Project.</div> <div>Table 6-10 of the Amendment Report provides a summary of the findings of additional dwelling assessments as identified by the DPIE in relation to the updated 65 turbine Project Layout. The table provides an overview of the findings of the assessment, proposed mitigation strategy and the revised assessment of visual impact rating based on findings from the following:</div> <div><div>■ identification of practical and feasible measures identified during site inspections;</div><div>■ assessment of the revised 65 turbine layout; and</div><div>■ implementation of mitigation measures.</div></div> <div>Further details on this visual assessment, as well as other additional dwelling assessments carried out, can be found in Appendix A of the Addendum LVIA in Appendix G of the Amendment Report. A summary is provided in Section 6 of the Amendment Report.</div>
DPIE_10	Transport Route	Provide a detailed analysis of alternative route options and justification for the preferred option.	<div>Six site access options were assessed during the preliminary assessment phase of the Project. These options are detailed below. Option 6 along Nundle Creek Road was removed early in the process due to lower quality existing public road, creek crossings, tight bends in the road, and significant new road modifications required. The five remaining access options were assessed by Siemens-Gamesa's (experienced turbine manufacturer and installer) civil engineering team with a focus on minimising public road modifications required, optimising road geometry and minimising grade, and minimising total earthworks required.</div> <div><div><div>Access Options</div><div><ul style="list-style-type: none">32-36km from New England Highway to Nundle3 existing local road options to site entranceOptions to site ridge line require upgrades to existing tracks</div></div><div>Siemens-Gamesa carried out site visits and design analysis to determine the viability and constructability of each route option to enable turbine component delivery. Their analysis showed that Option 5 (Barry Road) presented as the most practical route based on the following conclusions:</div><div><div>■ Majority of access defined over existing public roads, with the shortest length of new access road construction required.</div></div></div>

Reference No.	Theme	Submission	Response
			<div><div><div></div><div>Lowest existing natural ground slopes of all access options.</div></div><div><div></div><div>Lowest designed max slope of all access options.</div></div><div><div></div><div>Lowest total earthworks required of all viable options.</div></div></div> <div>Additional assessment conducted also found that:</div> <div><div><div></div><div>Head of Peel Road (Options 3 and 4) features a bridge and nine causeway creek crossings within a working cattle station that includes number of cattle grids meaning a significant amount of upgrade works would be required. . Head of the Peal Road also includes possible impacts to three identified Aboriginal sites, including one Potential Archaeological Deposit.</div></div><div><div></div><div>Option 5 includes the use of Barry Road, which is also frequently used by forestry trucks travelling to and from Werris Creek.</div></div><div><div></div><div>Option 5 requires the least encroachment onto private landowners properties along the route of all the options assessed.</div></div><div><div></div><div>Options 1-4 would require RAVs to either double pass through Nundle along Oakenville Street, Old Hanging Rock Road, Happy Valley Road, River Road, Jenkins Street and the Crawney Road loop, or pass through residential areas of Nundle including Herron Street, Innes Street, Gills Street, Jenkins Street, and Crawney Road.</div></div></div> <div>Since the lodgement of the EIS, the Proponent engaged Wallbridge Gilbert Aztec (WGA) to further consider alternate route options to site from a civil engineering perspective, and to progress an optimised design of the selected route. WGA have provided civil design services for over 15 wind farms in Australia. WGA compared a number of route options including the existing Devil's Elbow bypass route as well as a number of alternate route options off Crawney Road up to the western side of the Project, shown below. WGA's assessment found that these other options assessed would require approximately between 3 to 7 times the total length of required new road construction compared with the Devil's Elbow bypass, and a minimum of 10 times the total amount of earthworks required to complete the road construction. This would result in significantly more disturbance footprint for these route options. Based on this assessment WGA selected the Devil's Elbow bypass as the most viable transport route for the Project and completed an optimised design for this route.</div>

Reference No.	Theme	Submission	Response
			<div></div> <p>ROAD LAYOUT OPTIONS – SITE ACCESS</p> <p>Site visits to the proposed Devil's Elbow bypass area were also undertaken as part of the optimised design process with a number of civil contractors experienced in the construction of wind farms, as well as a site visit with Soil Conservation Services to gain feedback on optimal road alignment, construction techniques, and typical environmental impact mitigations during construction. A summary of the impacts that were considered and avoided in the optimised road design include:</p> <ul style="list-style-type: none">■ Addendum to the SOHI was completed by ERM to identify the risk of indirect impacts to the Black Snake Gold Mine heritage setting.■ Road was designed to avoid the known mine entrance in the area to the north of the gully.■ Road was designed to stay on the natural ridgeline and avoid crossing the gully.■ Road was designed to ensure the section of road traversing the location with possible presence of tunnels be in fill rather than cut, as suggested by the geotechnical engineering assessment.■ Safe tie ins with public road (Barry Rd) at top and bottom of the bypass road, as well as tie ins with the existing walking tracks in the area were considered.■ A balance between disturbance footprint reduction and minimising designed grades was considered. The final outcome of assessed disturbance footprint for the transport route in the Revised Project compared with the Original Project is a reduction from 17 Ha to 2.4 Ha (17 Ha was the total footprint considering several options combined for worst case design in the EIS, and further design was always intended to reduce impact. Avoiding Head of the Peel specifically saved 4 ha of native vegetation, the balance of avoided native vegetation was due to avoided alternate design options at Devil's Elbow and design optimisation of the preferred and optimised option).■ Pavement surface of the bypass road to be asphalt to ensure suitable traction for the OSOM delivery vehicles.

Reference No.	Theme	Submission	Response
			<p>Two transport and logistics contractors, experienced in the delivery of turbine components to similar large scale wind farms, were consulted on the optimised design. Both contractors confirmed the suitability of the proposed road designs for the construction of the Project. NSW RFS were also consulted on the proposed bypass road and confirmed their interest in having access to use the road after construction.</p> <p>Moir assessed the proposed Devils Elbow bypass in the LVIA Addendum and concluded there will be no material visual impacts. ERM assessed the heritage impacts of the proposed Devils Elbow bypass, including the indirect impacts to cultural heritage within the SOHI Addendum, and concluded heritage impacts will be negligible and the improved road will also offer the opportunity for the Council to, if considered appropriate, further enhance opportunities for visitors to appreciate the mining heritage of the area (eg through interpretive signage).</p> <p>In response to submissions, Turnbull Engineering were also engaged to further progress design of Morrison's Gap Road upgrades, and key intersections along the transport route. A licenced surveyor was engaged to complete boundary survey in these locations and the designs have confirmed that all required road upgrades along Morrisons Gap Road will remain within the public road corridor. The designs include some localised road widening to enable turbine components to be safely transported to site.</p> <p>Based on this assessment, the Proponent has elected to remove the optional Head of the Peel Road access route, and retain the primary route option of Barry Road and Morrisons Gap Road. In summary, avoiding the Head of the Peel Road removes impacts to 14 landowners (including Tamworth Regional Council owned land), reduces potential Aboriginal cultural heritage impacts, reduces native vegetation impacts by approximately 4 ha (along Head of the Peel Road), reduces the overall road works required and reduces overall disturbance footprint, removes the need for nine causeway creek crossings, and reduces the number of OSOM movements through residential areas in Nundle. The Devil's Elbow bypass road will be safe, practical, constructible and represents the lowest environmental impact of all route options considered.</p> <p>The Noise Impact Assessment Addendum (Appendix F of the Amendment Report) considers noise impacts associated with the amended transport route.</p>
DPIE_11		<ul style="list-style-type: none">■ Provide a schedule of all proposed road works and upgrades.	<p>A schedule of proposed road upgrades is provided in Appendix D of this Submissions Report</p> <p>An extensive list of public road modifications are proposed as part of the Project in the RJA Transport Route Assessment (Appendix I). These have also been summarised in Table 6.1 of the Traffic and Transport Addendum (Appendix H of the Addendum Report) and in the updated Project Description (Appendix A of the Amendment Report).</p> <p>The Proponent will conduct further assessment of Muswellbrook Shire Council owned road assets as based on final equipment dimensions and transport contractor selection. Structural assessments will be undertaken as required, and further consultation with Muswellbrook Shire Council will occur in this regard.</p>
DPIE_12		<ul style="list-style-type: none">■ Clarify and assess the proposed vehicle access route and site access points (including consultation with the relevant roads authorities and potentially impacted residences).	<p>The proposed access route has been amended and assessed as detailed in Chapter 6.4 of the Amendment Report.</p> <p>Consultation with relevant agencies including councils and Transport for NSW is summarised in Council Consultation in Chapter 4.1 and Regulatory Engagement in Chapter 4.2 of this report. Specific issues raised in submissions are also addressed in the relevant section of Responses to Government Agency Submissions in Chapter 5.</p> <p>Engagement with residents of Morrisons Gap Road and Shearers Road (where site access is proposed) is provided in Chapter 4.3.4 Targeted Stakeholder Engagement.</p> <p>Physical surveys of the intersection of Barry Road and Morrisons Gap Road and along Morrisons Gap Road have been completed to determine the exact location of the road reserve and geometry of the existing road. The physical surveys were undertaken by a licensed surveyor. Civil design has been updated to provide road geometry including road shoulders, drainage, proposed retaining walls and the location of existing vegetation in relation to private property boundaries. The updated civil designs confirms that all construction and earthworks can be maintained within the road corridor. The updated concept design with cadastre and vegetation survey are presented in Appendix P of the Amendment Report. This information has been shared with Tamworth Regional Council.</p> <p>There was an email campaign and follow up phone calls to residents of Morrisons Gap Road, with information on Project commitments regarding improving safety during construction include:</p> <ul style="list-style-type: none">■ The preparation of an Emergency Response Plan in consultation with local emergency services and residents to ensure safe passage for residents along Shearers Road and Morrisons Gap Road.■ Voluntary speeds limits and In Vehicle Monitoring system (IVMS) of project vehicles traveling to and from site to monitor speed.

Reference No.	Theme	Submission	Response
			<ul style="list-style-type: none"> Vehicle escorts for larger OSOM loads to ensure safe passage for residents. The introduction of a layby along Morrisons Gap Road to further facilitate safe road use. (Please see attached map of proposed laybys). Localised road widening commitment to allow 2-way traffic in parts. Road sealing at the end of construction and use of dust polymers during construction. The Project will provide UHF radios so residents can communicate any emergency or travel plans to site staff along with a protocol for reaching the site manager. The Project has also offered vegetation screening from the road for any resident's dwelling that is impacted by removal of vegetation within the public road corridor on Morrisons Gap Road.
DPIE_13	Biodiversity	<ul style="list-style-type: none"> Confirm that additional biodiversity assessment, including an updated BDAR, with consideration of comments provided by BCS, including matters relating to NPWS Estate. 	<ul style="list-style-type: none"> Response to BCS submission and subsequent engagement is provided in Table 5-3 and the updated BDAR is attached to the Amendment Report as Appendix D. This includes matters related to the NPWS estate. Separate responses to NPWS submission and subsequent engagement are provided in Table 5-8 of this report.
DPIE 14	Noise	<ul style="list-style-type: none"> Confirm that worst-case traffic numbers in the traffic noise assessment have been used and that dwellings predicted to experience exceedances of the Road Noise Policy criteria have been identified. 	<ul style="list-style-type: none"> Appendix F of the Amendment Report assesses the updated worst case traffic noise. This includes an assessment of dwellings predicted to experience exceedances of Road Noise Policy and criteria that apply for the forecast volumes. The assessment was updated based on the final access route (being Barry Road and Morrisons Gap Road), which includes the "Sub-Arterial Roads" of Oakenville Street and Barry Road. The criterion for these sub-arterial roads under the Road Noise Policy is an average noise level of 60 dB(A). It was noted in the original NIA in the EIS that the noise criterion of 55 dB(A) was predicted to be exceeded during the peak of construction activity. As noted in the NVIA Addendum letter (Appendix F of the Amendment Report), the highest noise level at a residence is 58 dB(A) during the peak of construction activity and would therefore achieve the most relevant 60 dB(A) criterion for sub-arterial roads. Residences with the highest predicted traffic noise levels during the peak of construction along the transport route were considered in the NVIA Addendum letter (Appendix F of the Amendment Report), which concluded that as these residences are adjacent to sub-arterial roads, the noise criteria under the Road Noise Policy are predicted to be achieved, even during the peak of construction activity.
DPIE 15	Aviation	<ul style="list-style-type: none"> Provide a lighting plan that identifies which wind turbines would have obstacle lighting installed and operating. 	<ul style="list-style-type: none"> Aviation Project assessed a suitable lighting plan for confirmation from CASA of its acceptance for aircraft safety in the area. The Aviation Lighting Plan and confirmation from CASA of its acceptance is in Appendix J of the Amendment Report.
DPIE 16	Soil and Water	<ul style="list-style-type: none"> Demonstrate that the proposed disturbance footprint includes an appropriate allowance for constructability, implementation of erosion and sediment controls, and is informed by geotechnical data collected on site. 	<ul style="list-style-type: none"> An Addendum Soil and Water Assessment (Appendix N of the Amendment Report) discusses the disturbance footprint, considers the outcomes of the geotechnical assessment and presents a range of mitigation and management controls.
DPIE 17	Consultation	<ul style="list-style-type: none"> Provide evidence of consultation undertaken with relevant government agencies, councils and the public regarding the matters outlined above, including any proposed amendments to the project. 	<ul style="list-style-type: none"> A Response to Submission Framework was developed as the Project process for engaging stakeholders, amending project design and reassessing impact. An overview of this is provided in Chapter 2.1 of this report. An overview of the consultation undertaken since lodgement of the EIS is provided in Chapter 4 of this Submissions Report, and Chapter 5.1 of the Amendment Report. Consultation with councils is summarised in Chapter 4.1 Council Engagement of this report. Consultation with Government Agencies is summarised in Chapter 4.2 Regulatory Engagement of this report. Consultation with the public is summarised in Chapter 4.3 Stakeholder Engagement of this report. The amendments made to the Project have responded to key issues raised during consultation with agencies, community and organisation submissions. Some key amendments relate to input from: <ul style="list-style-type: none"> DPIE requests to assess visual impact on key non-associated dwellings or recent development approved dwellings. DPIE BCD, Hills of Gold Preservation Inc and other specialist community organisations on biodiversity impacts. Hills of Gold Preservation Inc concerns on soil and water risks.

Reference No.	Theme	Submission	Response
			<ul style="list-style-type: none">- Tamworth Regional Council concerns on Devil's Elbow bypass constructability, visual impact and heritage, traffic route through Tamworth, biodiversity impacts and traffic impacts in Nundle.- Nundle Business and Tourism Marketing Group and individual submission concerns on the impacts of traffic through Nundle.- Muswellbrook Shire Council concerns of route selection and impacts to council owned and operated roads.- Transport for NSW concerns and recommendations on route selected.- Community concerns for impacts of aviation night lighting. <p>■ Project amendment that relate to agency engagement is summarised with responses to the agency submission in Chapter 5 of this report. Project amendments related to public and community organisation submissions and consultation is provided in Chapter 6 of this report.</p>
DPIE 18		<p>■ Clarify the status of neighbour agreements.</p>	<p>■ Please see section 4.4 of this report for an update to neighbour agreements.</p>

Table 5-2: DPIE Water and Natural Resources Access Regulator (NRAR) Submission Responses

Reference No.	Theme	Submission	Response
DPIE Water & NRAR_1	Water access	<ul style="list-style-type: none"> ■ Whilst Council has indicated the ability for the Proponent to purchase water, it is understood this is not the preferred option for the project due to the associated cost and transport requirements. The ability of Council to supply the necessary volumes in a potential drought scenario may also be limited. 	<ul style="list-style-type: none"> ■ A final decision on preferred water supply option/s will be determined at the construction phase of the Project. There are feasible options for the supply of water for the 24-month Project construction period. The four viable options available to source the estimated 55 ML of water required for construction include: <ul style="list-style-type: none"> – council water supply, with agreement with the relevant Council(s); – extraction from an existing nearby landowner bore, with agreement from the landowner; – extraction from a new groundwater bore; and – extraction from a surface water source (e.g. Chaffey Dam or the Peel River). ■ If water is assessed to be best sourced through extraction of a new groundwater bore or other water sources covered by water sharing plans, all required Water Access Licences and approvals will be applied for and obtained. ■
DPIE Water & NRAR_2		<ul style="list-style-type: none"> ■ In terms of accessing existing or new bores, no assessment has been provided of individual bores to confirm a water supply is available and that any impacts are within standard assessment criteria. Whilst it is recognised the groundwater source may be able to meet some of the demands from the project, uncertainty remains until a bore is installed and assessed for yield, quality and impacts. ■ The Proponent will need to provide an assessment of the assessment criteria before approval of water take can occur. 	<ul style="list-style-type: none"> ■ Any application for Water Access Licences and approvals will include an assessment and relevant data required by the relevant approval process.
DPIE Water & NRAR_3		<ul style="list-style-type: none"> ■ As the EIS has not presented against these impact criteria, nor nominated a site from which the bore(s) would be located, DPIE Water cannot complete its own groundwater impact assessment. 	<ul style="list-style-type: none"> ■ A final decision on preferred water supply option(s) will be determined at the construction phase of the Project. Should a groundwater supply be determined as a preferred water supply option, all required water access licence/s and approvals will be applied for and obtained.
DPIE Water & NRAR_4		<ul style="list-style-type: none"> ■ If new bores or pumps are proposed, it is recommended their installation and operation be assessed as part of the SSD assessment process to identify the application and approval requirements for any necessary water access licence(s) under the Water Management Act 2000. 	<ul style="list-style-type: none"> ■ A final decision on preferred water supply option(s) will be determined at the construction phase of the Project. Should a groundwater supply be determined as a preferred water supply option, all required water access licence/s and approvals will be applied for and obtained.
DPIE Water & NRAR_5		<ul style="list-style-type: none"> ■ DPIE Water and NRAR note that whilst groundwater interception is unlikely due to the project, if groundwater is to be intercepted the Proponent must obtain the relevant entitlement and approval where required prior to any extraction or interception. 	<ul style="list-style-type: none"> ■ Noted.
DPIE Water & NRAR_6		<ul style="list-style-type: none"> ■ The availability of water in farm dams has not been assessed to meet the projects requirements. 	<ul style="list-style-type: none"> ■ The Project Area contains several small farm dams operated by the involved landowners for current land uses. Any use of these dams as a component of the Project water supply mix will be subject to landowner agreement and all required water access licence/s and approvals being applied for and obtained.
DPIE Water & NRAR_7		<ul style="list-style-type: none"> ■ Accessing water from a new extraction point on the unregulated Peel River will require specific assessments based on the proposed point of extraction and the relevant trading rules of the Water Sharing Plan. Securing sufficient entitlement in the unregulated Chaffey Water Source may also be challenging considering there is less than 400ML of issued entitlement. This is yet to be addressed by the project. 	<ul style="list-style-type: none"> ■ A final decision on preferred water supply option/s will be determined at the construction phase of the Project. Should water extraction be determined as a preferred option, all required water access licence/s and approvals will be applied for and obtained.
DPIE Water & NRAR_8	Water licencing	<ul style="list-style-type: none"> ■ Obtain relevant approvals and licences under the Water Management Act 2000 before commencing any works which intercept or extract groundwater or surface water (unless an exemption applies). 	<ul style="list-style-type: none"> ■ Noted. ■ If water is assessed to be best sourced through extraction of a new groundwater bore or other water sources covered by water sharing plans, all required Water Access Licences and approvals will be applied for and obtained.
DPIE Water & NRAR_9	Water licencing	<ul style="list-style-type: none"> ■ Ensure that relevant nomination of work dealing applications for Water Access Licences proposed to account for water take by the project have been completed prior to the water take occurring. 	<ul style="list-style-type: none"> ■ Noted.
DPIE Water & NRAR_10	Water licencing	<ul style="list-style-type: none"> ■ Comply with the rules of the relevant water sharing plans. 	<ul style="list-style-type: none"> ■ Noted.
DPIE Water & NRAR_11	Erosion and sediment control during construction	<ul style="list-style-type: none"> ■ Prepare a Construction and Operational Environmental Management Plan (incorporating an Erosion and Sediment Control Plan) prior to commencement of activities. 	<ul style="list-style-type: none"> ■ This will be incorporated into the Project Environmental Management Strategy and associated requirements.
DPIE Water & NRAR_12	Activities on waterfront land	<ul style="list-style-type: none"> ■ Ensure that works within waterfront land are in accordance with the Guidelines for Controlled Activities on Waterfront Land (NRAR 2018). 	<ul style="list-style-type: none"> ■ This will be incorporated into the Project Environmental Management Strategy and associated requirements.

Table 5-3: DPIE Environment Energy and Science (EES) - Biodiversity Conservation Division Submission Responses

Reference No.	Theme	Submission	Response												
EES_1	Project staging	<ul style="list-style-type: none">Given the nature of the project, the Proponent may wish to stage the construction of the project.	<ul style="list-style-type: none">Chapter 1.6 Project Staging of the Updated BDAR includes details on potential construction staging of the Project (refer Appendix D of the Amendment Report).The Project proposes to stage the construction to ensure ongoing avoidance and minimisation of impact can be achieved as the detailed design of the Project progresses. A detailed Staging Plan will be prepared and submitted to DPIE in advance of construction based on the final turbine selection and balance of plant contractor selected and associated construction plan preferences.Prior to works commencing for each of the construction stages, the biodiversity offset requirements associated with each stage will be confirmed by further assessments and secured through the legal mechanisms required by the NSW Biodiversity Offset Scheme and the EPBC Act Offsets Policy to ensure no net loss to biodiversity. Further detail is provided in response EES_9c below.The following set of example construction stages have been considered possible to be discrete packages of work for which staging of offset obligations is feasible. <div>Example Construction Staging Concept Scope of Works<table><tr><th>Scope of Work</th><th>Description</th></tr><tr><td>Haulage and External Route Upgrades</td><td>Required public road upgrades associated with bringing in materials and commencing construction on site.</td></tr><tr><td>Construction Compound and Internal Roads, Turbine Hardstands and Foundations</td><td>Establishment of construction facility and temporary laydown areas and commencement of internal road construction/ upgrades. Establish substation and batching plant areas. This may be further broken up in stages by area of the Project.</td></tr><tr><td>Ancillary Infrastructure</td><td>Substation, batching plant, O&M Facility and temporary laydown areas.</td></tr><tr><td>Transmission Line</td><td>External Transmission line construction.</td></tr><tr><td>Switching Station</td><td>This is located 20km from the wind farm Project Area and may be staged separately.</td></tr></table></div> <ul style="list-style-type: none">The Proponent will provide a final Project staging plan to DPIE with final detailed layout plan, updated surveys and updated BAM calculations. These will remain within the “worst-case” impact assessed as part of the Updated BDAR.	Scope of Work	Description	Haulage and External Route Upgrades	Required public road upgrades associated with bringing in materials and commencing construction on site.	Construction Compound and Internal Roads, Turbine Hardstands and Foundations	Establishment of construction facility and temporary laydown areas and commencement of internal road construction/ upgrades. Establish substation and batching plant areas. This may be further broken up in stages by area of the Project.	Ancillary Infrastructure	Substation, batching plant, O&M Facility and temporary laydown areas.	Transmission Line	External Transmission line construction.	Switching Station	This is located 20km from the wind farm Project Area and may be staged separately.
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Ancillary Infrastructure	Substation, batching plant, O&M Facility and temporary laydown areas.														
Transmission Line	External Transmission line construction.														
Switching Station	This is located 20km from the wind farm Project Area and may be staged separately.														
EES_2a	Biodiversity (BAM assessment)	<ul style="list-style-type: none">Not all components of the BAM assessment were included in the BDAR. The BDAR should be updated to fulfill the requirements of the BAM as described in Appendix 10 of the BAM; and	<ul style="list-style-type: none">Chapter 1.9 Report Structure in the Updated BDAR includes all elements required, as outlined in Appendix 10 of the BAM (2017). Table 11 in the Updated BDAR provides a summary of where the required information for a BDAR is located, to demonstrate compliance with the BAM. Refer to Appendix D of the Amendment Report for further details.												
EES_2b		<ul style="list-style-type: none">The field data sheets should be provided as an appendix to the BDAR for a more complete BAM assessment.	<ul style="list-style-type: none">Field data sheets are provided in Annexure H BAM Plot Survey Data of the Updated BDAR and have been provided in electronic form prior to submission of this report. Refer to Appendix D of the Amendment Report.												
EES_3	Biodiversity (Methodology)	<ul style="list-style-type: none">The methodology used to determine non-native vegetation must be clearly articulated. Justification for areas of non-native vegetation must be clearly provided in the BDAR;The selection of PCTs has not been adequately justified. Justification should be provided in the BDAR for the selection of all PCTs;All vegetation zones must be clearly mapped; andInclusion of vegetation plots located outside the project footprint must be justified. Where vegetation plots are not located in the project footprint, justification must be provided, including evidence that the plot is in the correct PCT and vegetation zone, and that the plot data is consistent with other plot data collected in that vegetation zone.	<ul style="list-style-type: none">Chapter 4.1.3 of the Updated BDAR (refer Appendix D of the Amendment Report) provides criteria used to assign PCTs, vegetation condition class, and determination of non-native vegetation and includes the following response:Vegetation confirmed within the site was classified using the BioNet Vegetation Classification application and stratified according to broad condition state to map vegetation zones across the development footprint. Each PCT and associated condition class was mapped for the development corridor as a separate vegetation zone based on vegetation structure and condition attributes. In accordance with Section 5.3.1.4 of the BAM, condition classes were assigned from recorded observations of tree, shrub and ground cover, grazing pressure and weed extent. The factors used to assign a condition class to each PCT are described below: <div>Criteria used to assign vegetation condition class:<table><tr><th>Condition class</th><th>Criteria</th></tr><tr><td><ul style="list-style-type: none">Non-native exotic grassland</td><td><ul style="list-style-type: none">Ground layer dominated by exotics, no native overstorey present.If trees are present in the overstorey they are non-native or outside of known species range.</td></tr><tr><td><ul style="list-style-type: none">Non-native planted/urban vegetation</td><td><ul style="list-style-type: none">Clearly modified vegetation that is subject to regular maintenance, such as slashing.Vegetation species composition not composed of locally-occurring species.</td></tr></table></div>	Condition class	Criteria	<ul style="list-style-type: none">Non-native exotic grassland	<ul style="list-style-type: none">Ground layer dominated by exotics, no native overstorey present.If trees are present in the overstorey they are non-native or outside of known species range.	<ul style="list-style-type: none">Non-native planted/urban vegetation	<ul style="list-style-type: none">Clearly modified vegetation that is subject to regular maintenance, such as slashing.Vegetation species composition not composed of locally-occurring species.						
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Reference No.	Theme	Submission	Response								
			<table><tr><td>■ Native Derived Native Grassland (DNG)</td><td>■ Trees and shrubs absent to very sparse and ground layer dominated by one or two native grass species.</td></tr><tr><td>■ Native vegetation – Low condition</td><td>■ Relatively intact canopy cover, young age class of trees (regrowth), moderate shrub and ground layer diversity. ■ No old growth canopy trees. ■ Grazing pressure moderate to high. ■ Presence of exotic species.</td></tr><tr><td>■ Native vegetation – moderate condition</td><td>■ Intact canopy cover, advanced tree age class, moderate to high shrub and ground layer diversity. ■ Limited old growth canopy trees with hollows. ■ Grazing pressure low. ■ Low cover of exotic or weed species.</td></tr><tr><td>■ Native vegetation – High condition</td><td>■ High structural and floristic diversity. ■ Old growth canopy trees with hollows present. ■ Grazing pressure absent.</td></tr></table> <ul style="list-style-type: none">■ Preliminary mapping of vegetation communities was conducted in the field using tablet computers (Samsung Galaxy Tab 3) running the ArcGIS Collector application in the field, with spatial data collection on the boundaries of each PCT and attribute data collected on dominant flora species and vegetation condition. PCT and vegetation zone maps were prepared using the data collection from the field verification surveys and aerial photograph interpretation. The mapping process involved using ArcMap to draw vegetation polygons around areas of vegetation using aerial photograph interpretation, then assigning each polygon a PCT and condition class. Aerial photographs utilised included a high resolution photograph captured by drone.■ Areas of vegetation for which a PCT could validly be assigned were identified and delineated in the field, and their condition determined. Identification of PCTs within the study area was confirmed with reference to the community profile descriptors held within the OEH (2012) mapping Project and the NSW the BioNet Vegetation Classification).■ General classification of native vegetation in NSW used in this report is based on the classification system in Keith (2004), which uses three groupings of vegetation: vegetation formation, vegetation class and vegetation type (PCT), with vegetation type the finest grouping. The grouping referred to in this report is PCT.■ Chapter 4.1.5 of the Updated BDAR provides plant identification and nomenclature. All vascular flora recorded during vegetation surveys were identified to species level where possible. Species that could not be identified in the field were recorded to the nearest possible family or genus and collected for later identification. Where they could not be identified confidently, specimens were lodged with the NSW Herbarium for identification.■ PCT justification, based on plot data, descriptions and photographs are provided in Appendix B of the Updated BDAR.■ Additional surveys to collect BAM plot data were carried out in March 2021 by four botanists over 100 person hours with collection of 24 additional plots. This included collection of plot data within the sections of 'Devil's Elbow' proposed for re-alignment, and along Morrisons Gap Road.■ An additional 24 vegetation integrity plots were carried out in accordance with the BAM and the results are summarised in chapter 4.1.4 Vegetation Condition plots of the updated BDAR.■ Table 19 in Section 4.2.3 of the Updated BDAR provides a detailed summary of the PCTs, vegetation zones, condition, extent, integrity score and associated TECs for the total combined development footprint, which has been used in assessing the impacts of the project. This information was used as the basis for a combined vegetation zone map for the entire Development Footprint (Figure 7, Pages 1 to 26).■ Updates to Figure 6, Pages 1 to 21 “Plant Community Types” provide mapping of PCT Verification Points across the Development Corridor.■ During planning and implementation of the field survey, BAM plots have been located as much as possible within the Development Footprint. Due to the revisions to the Development Footprint, there are some instances where plots are no longer located within the current Development Footprint assessed in this Updated BDAR. Where BAM plots have not been located within the Development Footprint, they have been located within a contiguous or representative vegetation zone and within the broader Development Corridor. This allows the vegetation integrity scores to be included in the BAM-Calculator to be consistent with the area impacted in the Development Footprint and to inform broader habitat as part of refined final design.	■ Native Derived Native Grassland (DNG)	■ Trees and shrubs absent to very sparse and ground layer dominated by one or two native grass species.	■ Native vegetation – Low condition	■ Relatively intact canopy cover, young age class of trees (regrowth), moderate shrub and ground layer diversity. ■ No old growth canopy trees. ■ Grazing pressure moderate to high. ■ Presence of exotic species.	■ Native vegetation – moderate condition	■ Intact canopy cover, advanced tree age class, moderate to high shrub and ground layer diversity. ■ Limited old growth canopy trees with hollows. ■ Grazing pressure low. ■ Low cover of exotic or weed species.	■ Native vegetation – High condition	■ High structural and floristic diversity. ■ Old growth canopy trees with hollows present. ■ Grazing pressure absent.
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Reference No.	Theme	Submission	Response
EES_4	Biodiversity	<ul style="list-style-type: none"> Permanent and temporary impacts for each vegetation category should be presented. A table should be created that states the permanent and temporary impacts for each vegetation category: exotic grassland, planted vegetation, cleared land and each PCT in order to clearly reconcile impacts across the development footprint. 	<ul style="list-style-type: none"> Table 22 of the Updated BDAR (Appendix D of the Amendment Report) provides a detailed summary of the PCTs, vegetation zones, condition, extent, integrity score and associated TECs for the total combined Development Footprint, which has been used in assessing the impacts of the Project. This information was used as the basis for a combined vegetation zone map for the entire Development Footprint (Figure 7, Pages 1 to 26). To show the contribution that each infrastructure element has to the overall impacts within the Development Footprint a breakdown of the area of each condition class of vegetation is provided in Table 21. This summary shows that most of the impacts associated with the wind turbines permanent and temporary footprint (68%), internal roads (58%) and transmission line access tracks (69%), are to non-native vegetation, with exotic grassland being the most common vegetation community mapped in these areas. This reflects the history of disturbance on the ridgeline from the historical and ongoing use as a grazing property. The concept alignment for the transmission line access tracks have also followed existing farm tracks and trails as much as possible to minimize impacts on native vegetation.
EES_5	Biodiversity (Maps, Tables and Figures)	<ul style="list-style-type: none"> Ecosystem species have been included in discussions regarding species credit species. Table 21 of the BDAR should contain only species credit species. 	<ul style="list-style-type: none"> Table 28 (previously table 21) "Potential species credit species assignment of candidate status" has been updated in the Amended BDAR in Appendix D of the Amendment Report. Biodiversity Risk Ratings have been added to the table in accordance with Appendix 10 of the BAM.
EES_6	Biodiversity (BAM assessment)	<ul style="list-style-type: none"> Inconsistencies exist between the field data and the data in the BAM calculator. Ensure that all data entered in the BAM-C is consistent with the field data. 	<ul style="list-style-type: none"> The BAM calculator has been revised and submitted with the updated BDAR in Appendix D of the Amendment Report.
EES_7	Biodiversity (SAIL)	<ul style="list-style-type: none"> Serious and Irreversible Impacts (SAIL) have not been addressed. A standalone section addressing serious and irreversible impacts as required by sections 10.2.2 and 10.2.3 of the BAM for all listed entities known or likely to occur in the study area is required. 	<ul style="list-style-type: none"> Assessments undertaken in accordance with Section 10.2 of the BAM for the above listed potential SAIL entities are included in Appendix E of the Updated BDAR with a summary provided in a dedicated chapter 8.6 Serious and Irreversible Impacts. Serious and Irreversible Impacts to cave dwelling microbats and their potential breeding habitat have been avoided through the removal and relocation of specific turbines from the project footprint. Overall design refinements undertaken since the exhibited BDAR have resulted in a material reduction of impact to Box Gum Woodland CEEC from 13.3 hectares to 6.07 hectares. Approximately 41 % of the remaining impacts to Box Gum Woodland (2.47 hectares) as a result of the project will occur on areas of DNG or that have been assessed as occurring in Low condition. Accordingly, the Project is not considered likely to reduce the extent of the Box Gum Woodland CEEC at the national, bioregional or local scales, and the Project will not lead to a reduction in the geographic distribution of Box Gum Woodland.
EES_8	Biodiversity (WTG placement)	<ul style="list-style-type: none"> The potential impact to fauna relating to turbine placement has not been adequately addressed. The potential impacts of turbine spacing should be addressed as prescribed impacts. 	<ul style="list-style-type: none"> Chapter 8.3.2 and 8.3.3 and 8.5 of the Updated BDAR (Appendix D of the Amendment Report) has been updated to include a qualitative risk assessment of turbine strike and to address impacts prescribed by the BAM (2017).
EES_9a	Biodiversity (BDAR)	<ul style="list-style-type: none"> Prescribed impacts relating to wind farms have not been adequately addressed: Further assessment of the potential for blade strike on fauna, particularly microbats, is required. 	<ul style="list-style-type: none"> Chapter 8.3.1 Indirect/uncertain impacts to microbats has been revised in the updated BDAR (Appendix D of the Amendment Report). This includes a project specific risk assessment for the potential for turbine strike impacts for each microbats species in Table 56. Section 8.3.2 Collision Risk (birds) of the Updated BDAR (Appendix D of the Amendment Report) has been updated to include a qualitative risk assessment of each bird species at risk. This includes a project specific risk assessment for the potential for turbine strike impacts for each bird species in Table 59. Section 8.3.2 Collision Risk (birds) of the Updated BDAR (Appendix D of the Amendment Report) further assesses potential risk of impact to threatened species associated with turbine placement, barriers to movement and potential collision with turbine blades. A qualitative risk assessment has been prepared on a per turbine basis and is included in Table 61. The Proponent has removed 3 turbines (WP 23, WP, 27, WP 31) creating a high risk of impact and 1 turbine (WP 01) creating a moderate risk of impact. Two additional turbines (WP50 and WP 2) with either high or moderate risk to impact have been relocated to create greater buffer to habitat mapped. As a best practice measure, adaptive management is proposed through the preparation and implementation of an operational Bird and Bat Adaptive Management Plan (BBAMP) that will be prepared prior to operation. The BBAMP will contain stringent controls for the ongoing monitoring of any bat or bird mortality, continually testing the assumptions of this impact assessment and enable adaptive management measures to be implemented, if required, to reduce measured impacts. The plan will include methods for monitoring mortality, identify acceptable thresholds for mortality and specify adaptive management regimes if these thresholds are exceeded.
EES_9b		<ul style="list-style-type: none"> Proposed mitigation measures for prescribed impacts such as blade strike and barotrauma should be presented in the BDAR. 	<ul style="list-style-type: none"> The Proponent consulted DPIE BCD on the 27th of May 2021 with proposed monitoring and adaptive operational strategies proposed to be committed to in the BBAMP section of the Updated BDAR. BCD provided feedback to ensure the adaptive commitments could be feasibility implemented. These strategies have been confirmed feasible to implement with Wind Turbine OEMs and with the project Proponent. The Updated BDAR now includes Section 9.9.1 providing "Operational turbine specific mitigations" for all turbines. These include: <ul style="list-style-type: none"> Development of a BBAMP in consultation with BCD to be implemented throughout life of project.

Reference No.	Theme	Submission	Response
			<ul style="list-style-type: none"> Intensive monitoring period for the first six months of operation to be outlined in the BBAMP, followed by regular bird and bat monitoring/mortality surveys for the life of the wind farm at frequencies based on the findings of each survey period and adaptive management strategy detailed in the BBAMP. Investigation into the need for, and effectiveness of, appropriate low wind speed operational curtailment strategies (further detailed below), that may include measures such as prevention of blade rotation prior to electricity generation cut-in speeds, and/or increased night time cut-in speeds. Research into the bat and bird deterrent systems and associated reduction of impacts, to establish whether implementation at the Project would be effective and practicable with the goal of integrating into BBAMP for re-evaluating turbine risk levels if proven effective. Regular ongoing maintenance of rotor blades to improve ultrasonic bounce-back enabling microbat avoidance. Installation of lighting schemes that minimise insect attraction to turbines within rotor swept height. Commitment to provision of data from ongoing bird and bat monitoring surveys and effectiveness of BBAMP to specialist research entities who are prepared to enter into appropriate agreements with the Project. <ul style="list-style-type: none"> The Proponent has revised the layout to remove 3 turbines which were considered high risk, WP 23, WP27 and WP 31. WP 50 has also been relocated out of any assessed direct impact and is proposed to be further mitigated by the following additional mitigations measures: <ul style="list-style-type: none"> Disturbance to roosting microbats as a result of ground vibration during the breeding season (November to February) or winter torpor season (May to September) will be avoided and minimised as far as practicable. Monitoring of the presence of microbats within the habitat feature(s) near WP50 will be undertaken prior to vibration-causing construction activities where required works coincide with breeding/torpor periods. If microbats are confirmed present prior to construction works commencing (during breeding/torpor periods), monitoring will continue during and post-construction, and suitable impact mitigation measures will be investigated such as: <ul style="list-style-type: none"> investigation into a suitable maximum vibration level to prevent disturbance to roosting microbats; assessment of what activities or plant may cause this maximum vibration level to be triggered; and at what distance (setbacks) unacceptable levels of vibration may be experience at the habitat location. Additional low wind speed seasonal curtailment strategy with increased night-time cut-in speeds will be implemented. Strategy will be determined through measures such as analysis/comparison of microbat activity data with wind data collected during the EIS, or through undertaking a controlled experiment using (for example) a Before-After-Control-Impact (BACI) design, and implemented as part of the BBAMP. Increased frequencies of bird and bat monitoring/mortality surveys for at least months 7-30 of operation. Following which, the results will determine the frequency with which surveys will be ongoing and detailed in the BBAMP. Chapter 8.10.2 Bird and Bat Adaptive Management Plan has been included to provide greater clarity to the contents of the BBAMP. All requirements of the BBAMP would be developed in further consultation with BCD and DPIE. Further detail on adaptive management and the likely contents of the BBAMP are provided in Section 8.10 of the Updated BDAR. Section 8.3.1 includes assessment of Barotrauma on bats and concludes impacts to microbat species may occur as a result of turbine strike, it is considered unlikely that additional impacts will occur as a result of barotrauma.
EES_9c		<ul style="list-style-type: none"> Options to compensate for unavoidable prescribed impacts, and the decision pathway and justification for suggested credit numbers or other compensatory actions, should be clearly documented in the BDAR. 	<ul style="list-style-type: none"> A Biodiversity Offset Strategy has been prepared to provide further options to ensure that unavoidable impacts are fully offset as required by the NSW Biodiversity Offset Scheme and the EPBC Act Offsets Policy to ensure no net loss to biodiversity. The Biodiversity Offset Strategy is summarised in Chapter 9.1 of the Updated BDAR and in full in Appendix E of the Amendment Report. Local offset feasibly has been assessed in a Biodiversity Offset Strategy including a combination of field surveys and desktop analysis or target properties. Information on the estimated available local credits is provided in Section 9.1.2. This is expected to provide further options to compensate for unavoidable impacts. The Project's proposed offset strategy of targeting local properties for the establishment of Biodiversity Stewardship Sites provides potential opportunities for strategic enhancement of local habitat connectivity. Such enhancements could occur along the southern side of the ridgeline between Ben Halls Gap Nature Reserve and Crawney Pass National Park, and over Crawney Mountain to Wallabadah Nature Reserve, linking the three conservation areas. This enhancement of local connectivity can be achieved through the in-perpetuity conservation agreements which will improve the biodiversity values on the land and increase habitat connectivity. Connectivity enhancements realised in this strategic location will not only offset direct impacts resulting from the project, but also allow for potential indirect impacts associated with disruption of habitat connectivity to be mitigated against and offset through the establishment of a managed corridor linking local conservation reserves and high-quality habitats.

Reference No.	Theme	Submission	Response
EES_10	Biodiversity (WTG placement)	<ul style="list-style-type: none"> Direct impacts on cave bat roosts needs to be clarified. Justification is required for the placement of turbines within cave bat roosting habitat buffers. 	<ul style="list-style-type: none"> Expert advice regarding the presence of geological features of significance within the study area and in the broader landscape has been provided by Environmental Geosurveys Pty Ltd (Neville Rosengren, Geomorphologist and Honorary Associate La Trobe University). Figure 14 in the Updated BDAR has been provided to present the revised bat habitat. The full report (Environmental Geosurveys 2021) is attached as Appendix G of the Updated BDAR. A microbat cave roost inspection was carried out between 29 March 2021 and 1 April 2021. All high priority areas that were identified via desktop as having a sudden change in elevation (ie potential large caves, and clifflines) were able to be visually inspected from the nearest accessible point. The detailed findings of the geomorphological assessment and the follow-up desktop and ground-truthing assessment of potential microbat roots surrounding the study area are provided in Section 5.4.2 of the Updated BDAR. The updated microbat roosting habitat areas have been mapped in more detail in Section 5.4.2 of the Updated BDAR and a table presenting results of the microbat habitat investigation are provided in Table 41. This responds to additional consultation with BCD to ensure that satisfactory evidence could be provided justifying changes habitat polygons. This is further supported by pictures of the investigation areas that can be referenced to the table and updated mapping. As a result of additional surveys and Project amendments to remove turbines from updated mapping habitat, the project will not result in any direct impacts to cave bat roosts, nor will any project infrastructure occur within cave bat roosting habitat buffers. Figure 14 of the Updated BDAR provides the updated mapped microbat roosting habitat areas. Appendix E of the Updated BDAR provides details associated with assessments undertaken in accordance with serious and irreversible impact assessment, providing further assessment of impacts to cave roosting bats. Section 8.5 of the Updated BDAR provides an assessment of the prescribed impacts of the project to bats.
EES_11	Biodiversity (WTG placement)	<ul style="list-style-type: none"> Indirect impacts on microbats have not been adequately addressed. Further study to determine the size, extent and nature of the local bat population is required. 	<ul style="list-style-type: none"> Section 5.4.2 of the Updated BDAR includes updated additional assessment of the microbat local microbat population. It includes assessment of indirect impact through a combination of acoustic call data analysis, desktop/on-ground assessment of potential habitat locations, and geomorphological analysis and advice undertaken to determine the likelihood of microbat species roosting and/or potentially breeding within the study area or immediate surrounds. Section 8.3.1 of the Updated BDAR includes a qualitative risk assessment for indirect impacts to the local microbat population. Table 56 has been updated to provide a Qualitative risk assessment for potential blade strike impacts to microbats by species. Section 8.5 of the Updated BDAR has been included to assess prescribed impacts, many of which are indirect impacts to microbats. An updated assessment is included in Appendix E – Serious and Irreversible Impact of the BDAR and provides further analysis on the local population. Whilst it is acknowledged that without trapping surveys, microbat breeding activity cannot be conclusively ruled out from occurring within and surrounding the Project Area, analysis temporal activity patterns do not suggest that this is occurring. Based on the low potential for large numbers of bats roosting in the immediate vicinity of the Development Footprint, combined with the lack of evidence to suggest microbats are congregating within the study area during known breeding seasons, it is concluded that the potential for impacts to breeding microbats as a result of the development are low.
EES_12	Biodiversity	<ul style="list-style-type: none"> Additional assessment of a locally important population of the Greater Glider is required. Further justification should be provided as to why the local population of the Greater Glider is not considered an important population. 	<ul style="list-style-type: none"> Section 8.8.5 (MNES Significant Impact Assessment) and Table 70 of the Updated BDAR includes an updated EPBC Act significant impact assessment for Greater Glider and provides evidence population does not constitute an important population. While the proposed removal of 37.5 ha hectares of Greater Glider habitat will not contribute to the recovery of the species, it is not considered likely to substantially interfere with the recovery of the species for the following reasons: <ul style="list-style-type: none"> Ben Halls Gap Nature Reserve occurs directly east of the Development Footprint, and likely contains large areas of high quality habitat for the species. This habitat is considered adequate such that the loss of habitat within the Development Footprint would not reduce the local population size, or decrease the viability of the local population. There is also large areas of suitable Greater Glider habitat retained within the Project Area. As part of the project, preclearance assessments would be undertaken and clearing of hollow-bearing trees would be supervised by an ecologist, and any Greater Gliders utilising the habitat being removed from the Development Footprint would be captured and relocated. Due to the large areas of suitable habitat nearby (i.e. within the reserve system), it is likely that displaced individuals would be successfully relocated, assuring that the local population would not decrease in numbers as a result of the proposed works.

Reference No.	Theme	Submission	Response
EES_13	Biodiversity (Methodology)	<ul style="list-style-type: none"> The surveys completed for large forest owls are inadequate. Either additional surveys for large forest owls (equating to that required for a 90% probability of detection) be conducted, or an expert report be obtained, to confirm the presence or absence of large forest owls. 	<ul style="list-style-type: none"> It is noted that a total of four nights of targeted call-playback surveys for forest owls was undertaken with no large forest owls being detected but it is accepted that the assessment was unable to meet the 90% probability requirement outlined in the <i>Threatened Biodiversity Survey and Assessment: Guidelines for Developments and Activities Working Draft November 2004</i> (DEC 2004) to exclude the species presence. As such, further large forest owl habitat suitability mapping and assessment was carried out. This assessment conservatively assumed the presence of the Barking Owl, Powerful Owl, Masked Owl and Sooty Owl and assessed the updated Project on this basis. Details on the parameters used to model potential owl breeding habitat impacted by the Project (in accordance with the BAM) are provided in Section 5.5 of the Updated BDAR. The approach to mapping species credit polygons in the Updated BDAR for large forest owls assumed presence in areas of habitat suitability and did not require additional field surveys. The wind farm development corridor is only considered likely to support potential large forest owl breeding habitat in the wetter forested gullies/drainage lines on the three “fingers” and with only low-moderate potential. The majority of the site is not suitable for owl breeding due to a lack of sheltered gullies, existing disturbances associated with clearing and agricultural land use and highly edge-effected patches of vegetation. Table 43 describes the habitat features and method for mapping species credit habitat for three species of large forest owls. The impact assessment and BAM inputs have been revised to calculate required offset credits to compensate for impacts to the mapped large forest owl habitat. Figure 20 provides updated habitat mapping for large forest owls. Table 59 provides a qualitative risk assessment for potential blade strike to birds including assessed owl species. Forest owl species assumed present within, and/or immediately surrounding, the development footprint (refer Section 5.4.2) are included as part of this risk assessment and have all been assessed as of Low risk of impact through blade strike. This is due largely to their behaviour of flying within or just above the canopy, and therefore below rotor swept height. It should be noted that WP31 previously intersected with modelled owl breeding habitat, and was subsequently removed from the design.
EES_14	Biodiversity (Bird and Bat Adaptive Management Plan_	<ul style="list-style-type: none"> Consider the potential use of sniffer dogs for the proposed monitoring programme following the commencement of operations, as outlined in the Bird and Bad Adaptive Management Plan (BBAMP) 	<ul style="list-style-type: none"> Intensive monitoring period for the first six months of operation will be included in the BBAMP, followed by regular bird and bat monitoring/mortality surveys for the life of the wind farm at frequencies based on the findings of each survey period and the adaptive management measures detailed in the BBAMP. The use of detection dogs during carcass surveys will be investigated and employed if found to be suitable and appropriate.

Table 5-4: NSW Environment Protection Authority (EPA) Submission Responses

Reference No.	Theme	Submission	Response
EPA_1	Approvals	<ul style="list-style-type: none"> The Proponent has outlined that crushing of materials at the concrete batching plant may occur. The Proponent should note that an Environmental Protection Licence is not required for concrete batching. However, crushing, grinding or separating is a scheduled activity if certain volume limits per day or annually are met. The EPA recommends that the Proponent provides an estimate of crushing volumes over the life of the project. 	<ul style="list-style-type: none"> EPA advice relating to concrete batching is noted. The Project will undertake 'crushing, grinding or separating' works at an estimated annual capacity of 475,000 tonnes per annum during construction. The EPL to be sought for the Project will include 'crushing, grinding or separating' as a scheduled activity.
EPA_2	Noise and Vibration	<ul style="list-style-type: none"> If a strategy of operating some turbines in a 'reduced noise mode' is intended to be used, Proponents must provide Planning, EPA and any potentially impacted residents with the parameters and meteorological conditions which trigger their use and an auditable process by which compliance can be independently confirmed. 	<ul style="list-style-type: none"> Sonus has considered noise related comments in a response letter provided in Appendix F of the Amendment Report. Based on the conservative predictions in the Noise and Vibration Assessment, noise reduced modes would need to be implemented at wind speeds of 8 m/s and above. These required modes and resultant sound power levels are detailed in the Noise and Vibration Assessment (Sonus, 2020), Appendix E of the EIS. It is noted that the above may change as a result of the final turbine selection and layout. An updated noise assessment will be provided for the final layout and turbine model, prior to construction. This final assessment will detail the noise levels at residences and the curtailment strategy (wind speeds directions and noise reduced mode for each turbine) to ensure the criteria are achieved. It will also incorporate a method of reporting to demonstrate that the modes have been implemented. In addition, operational noise monitoring will be undertaken as required to confirm compliance with project noise limits at relevant receivers.
EPA_3	Approvals	<ul style="list-style-type: none"> Matters to be addressed with conditions: <ul style="list-style-type: none"> Except as expressly provided by the general terms of approval, works and activities must be carried out in accordance with the Hills of Gold Wind EIS. Except as expressly provided by an EPL under the Protection of the Environment Operations Act 1997 (POEO Act) in relation of the development, section 120 of the POEO Act must be complied with in, and in connection with, the carrying out of the development. Any variations to the EPL are to be negotiated with the EPA. Except as expressly provided for by the EPL, the Proponent must not discharge any wastewater from the Concrete Batching Plant or from any sediment dams associated with the Project. An Erosion and Sediment Control Plan (ESCP) must be prepared for all aspects of the construction phase of the development and must be implemented. The Stormwater Management Plan should be consistent with the practices and principles contained in Managing Urban Stormwater – Soils and Construction, Volumes 1 and 2 (Landcom, 2004; DECC, 2008). An ESCP must be prepared for all aspects of the operation phase of the development and must be implemented. The Stormwater Management Plan should be consistent with the practices and principles contained in Managing Urban Stormwater – Soils and Construction, Volumes 1 and 2 (Landcom, 2004; DECC, 2008). The Proponent must prepare a Soil and Water Management Plan to address all proposed activities and potential impacts associated with the project. The EPA recommends that the Proponent submits a revised noise impact assessment, before construction commences, to the Planning Secretary for approval based on detailed design and final turbine selection demonstrating that the criteria in the Planning Bulletin can be met. This document can then be used by the EPA to establish numerical (objective) noise criteria for inclusion in the EPL based on the installed turbines. The EPA recommends all construction work at the premises must be conducted between 7am and 6pm Monday to Friday and between 8am and 1pm Saturdays and at no time on Sundays and Public Holidays. The following activities may be carried out outside the recommended construction hours: <ul style="list-style-type: none"> construction that causes LAeq(15 minute) noise levels that are: <ul style="list-style-type: none"> no more than 5dB above Rating Background Level at any residences in accordance with the Interim Construction Noise Guideline (DECC, 2009); and no more than the Noise Management Levels specified in Table 3 of the Interim Construction Noise Guideline (DECC, 2009) at other sensitive land uses; or 	<ul style="list-style-type: none"> Noted. It is expected that these requirements will be conditioned in any approval for the Project.

Reference No.	Theme	Submission	Response
		<ul style="list-style-type: none"> – for delivery of materials required by the police or other authorities for safety reasons; or – where it is required in an emergency to avoid the loss of lives, property and/or to prevent environmental harm. – If blasting is required for any reason during the construction or operational stage of the proposed development, blast impacts are to comply with the guidelines and criteria contained in 'Australian and New Zealand Environment Council – Technical basis for guidelines to minimise annoyance due to blasting overpressure and ground vibration' (ANZEC, 1990). 	

Table 5-5: Department of Primary Industries, Agriculture Land Use Planning (DPI Agriculture) Submission Responses

Reference No.	Theme	Submission	Response
DPI Agriculture_1	Decommissioning	<ul style="list-style-type: none"> ■ The current decommissioning commitment in the EIS states below ground infrastructure, including the wind turbines foundations and hardstands, will be left insitu. DPI advises all infrastructure to a depth less than 500mm on arable land, including improved pasture lands, be removed during decommissioning. 	<ul style="list-style-type: none"> ■ All infrastructure to a depth less than 500 mm from the rehabilitated ground surface will be removed.

Table 5-6: DPI, Fisheries NSW (DPI Fisheries) Submission Responses


Reference No.	Theme	Submission	Response
DP Fisheries_1	Comment	<ul style="list-style-type: none"> ■ Fisheries NSW has no objections to the proposal as there are few direct impacts on Key Fish Habitat. 	<ul style="list-style-type: none"> ■ Noted.
DP Fisheries_2	Soil and Water (Waterways)	<ul style="list-style-type: none"> ■ All road crossings, underground cable routes, transmission lines and temporary access tracks minimise impacts on the waterways. To achieve this all works should comply with Fisheries NSW Policy and Guidelines for Fish Habitat Conservation and Management (2013 update). 	<ul style="list-style-type: none"> ■ Noted.

Table 5-7: Heritage NSW (HNSW) Submission Responses

Reference No.	Theme	Submission	Response																																																						
HNSW_1	Aboriginal heritage	<ul style="list-style-type: none">HNSW recommend that the Proponent provide evidence-based reasons for undertaking salvage excavation of a Potential Archaeological Deposit (PAD) at Peel River/Woodleys Ck and another PAD associated with recorded Aboriginal site Hills Gold AFT 3 (KNC 2020:45). The ACH assessment results confirm low density and frequency of stone artefacts impacted by an extensive land use disturbance history (KNC 2020:3-4, 17).	<ul style="list-style-type: none">The updated transport route no longer proposes any impact to the PAD at Peel River/Woodleys Ck, AFT 2, AFT 3 or IF 2 as the Head of Peel Road will no longer be used as an access road to the Project Area. As a result of Project amendments the following reduction in heritage impact has been assessed: <div>Updated Project Impact to Aboriginal Archaeological Sites/PAD<table><tr><th>Site Name</th><th>Assessed Significance / Potential</th><th>EIS Type/Degree of harm</th><th>EIS Consequence of harm</th><th>Amended Project Type / Degree of harm</th><th>Amended Project Consequence of harm</th></tr><tr><td>Hills of Gold AFT 1</td><td>Moderate</td><td>None</td><td>N/A</td><td>None</td><td>N/A</td></tr><tr><td>Hills of Gold AFT 2</td><td>Low</td><td>Direct/Partial</td><td>Partial loss of value</td><td>None</td><td>N/A</td></tr><tr><td>Hills of Gold AFT 3</td><td>Moderate</td><td>Direct/Partial</td><td>Partial loss of value</td><td>None</td><td>N/A</td></tr><tr><td>Hills of Gold AFT 4</td><td>Low</td><td>Direct/Total</td><td>Total loss of value</td><td>Direct/Total</td><td>Total loss of value</td></tr><tr><td>Hills of Gold IF 1</td><td>Low</td><td>Direct/Total</td><td>Total loss of value</td><td>Direct/Total</td><td>Total loss of value</td></tr><tr><td>Hills of Gold IF 2</td><td>Low</td><td>Direct/Total</td><td>Total loss of value</td><td>None</td><td>N/A</td></tr><tr><td>Hills of Gold IF 3</td><td>Low</td><td>Direct/Total</td><td>Total loss of value</td><td>Direct/Total</td><td>Total loss of value</td></tr><tr><td>Peel River/Woodleys Creek PAD</td><td>Moderate</td><td>Direct/Partial</td><td>Partial loss of value</td><td>None</td><td>N/A</td></tr></table></div>	Site Name	Assessed Significance / Potential	EIS Type/Degree of harm	EIS Consequence of harm	Amended Project Type / Degree of harm	Amended Project Consequence of harm	Hills of Gold AFT 1	Moderate	None	N/A	None	N/A	Hills of Gold AFT 2	Low	Direct/Partial	Partial loss of value	None	N/A	Hills of Gold AFT 3	Moderate	Direct/Partial	Partial loss of value	None	N/A	Hills of Gold AFT 4	Low	Direct/Total	Total loss of value	Direct/Total	Total loss of value	Hills of Gold IF 1	Low	Direct/Total	Total loss of value	Direct/Total	Total loss of value	Hills of Gold IF 2	Low	Direct/Total	Total loss of value	None	N/A	Hills of Gold IF 3	Low	Direct/Total	Total loss of value	Direct/Total	Total loss of value	Peel River/Woodleys Creek PAD	Moderate	Direct/Partial	Partial loss of value	None	N/A
Site Name		Assessed Significance / Potential	EIS Type/Degree of harm	EIS Consequence of harm	Amended Project Type / Degree of harm	Amended Project Consequence of harm																																																			
Hills of Gold AFT 1		Moderate	None	N/A	None	N/A																																																			
Hills of Gold AFT 2		Low	Direct/Partial	Partial loss of value	None	N/A																																																			
Hills of Gold AFT 3		Moderate	Direct/Partial	Partial loss of value	None	N/A																																																			
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Peel River/Woodleys Creek PAD	Moderate	Direct/Partial	Partial loss of value	None	N/A																																																				
HNSW_2	<ul style="list-style-type: none">HNSW recommends that alternative mitigation measures are also considered to ensure that the appropriate management action is selected for each site. Archaeological test excavation should be conducted where there is uncertainty about the need for salvage excavation.	<ul style="list-style-type: none">Based on Project amendments, the updated transport route no longer proposes any impact to the PAD at Peel River/Woodleys Ck, and AFT 3 and therefore archaeological salvage excavation identified in the Aboriginal Heritage Assessment (KNC, 2020) will not be required.																																																							
HNSW_3	<ul style="list-style-type: none">Results of salvage excavations have indicated that no further investigations are required.	<ul style="list-style-type: none">Noted.																																																							
HNSW_4	<ul style="list-style-type: none">The Proponent is reminded that all recorded Aboriginal objects must be registered on the Aboriginal Heritage Information Management System (AHIMS) in order to comply with section 89A of the National Parks and Wildlife Act 1974.	<ul style="list-style-type: none">Noted.																																																							

Table 5-8: National Parks and Wildlife Service (NPWS) Submission Responses

Reference No.	Theme	Submission	Response
NPWS_1	Biodiversity (Collision risk)	<ul style="list-style-type: none">■ Appropriate setbacks are required of WTGs from Ben Halls Gap Nature Reserve (“BHGNR”) and Crawney National Park (“CNP”) to minimise potential impact of blade strike on birds and bats.	<ul style="list-style-type: none">■ The Proponent has removed two turbines in close proximity to Ben Halls Gap Nature Reserve and Crawney National Park to increase setbacks to these areas in those locations. Please see response NPWS_9 below for information on Project amendments relating to the further mitigation measures to protect connectivity of species habitat.■ Potential impacts have been assessed through responses provided in EES_8, 9A, 9B and 9C.■ Chapter 8.3.2 and 8.3.3 of the Updated BDAR has been updated to include a qualitative risk assessment by turbine for the impacts of turbine strike for avian species known or considered to have the potential to occur within the project area including microbats. 3 of the 4 turbines considered high risk of impact has been removed. Please see response to NPWS_9 below.
NPWS_2	Aviation	<ul style="list-style-type: none">■ The EIS impact assessment for aviation concentrates on commercial aviation and fails to adequately address potential impacts on NPWS aerial operations using both fixed wing and rotary aircraft over and around the adjoining reserves. This includes firefighting, aerial pest control and survey work. These operational impacts need to be fully assessed by the Proponent and adequate setbacks applied between WTGs and the park boundary.	<ul style="list-style-type: none">■ Aerial firefighting was considered in Section 3.15 of the Aviation Impact Assessment (AIA) (Appendix H of the EIS). Further analysis has been provided in an Aviation Impact Assessment Response to Submission and Amendment Report Advice Letter (Aviation Projects, 2021) provided in Appendix J of the Amendment Report.■ The assessment included consideration of the proximity of the Project to both Ben Halls Gap Nature Reserve and Crawney Pass National Park.■ In respect to the ongoing aerial operations carried out by NPWS, including firefighting, Section 3.7 of the Aviation Impact Assessment also considers the required flight buffers prescribed by the Civil Aviation Regulation (1988) to be within a radius of 600 m for fixed wing, and 300 m for helicopters from any object in visual flight during the day. It should be noted that aerial firefighting operations are however generally flown below 500 ft, with different obstacle separation requirements, based on aircraft operator and pilot assessment. All WTG’s will be programmed to shut off, remaining in the Y position in the event of any emergency operations within the vicinity however as per the most recent Australasian Fire and Emergency Service Authorities Council Limited doctrine, “Aerial personnel should asses the risks posed by aerial obstacles, wake turbulence and moving blades in accordance with routine procedures.”■ The closest WTG to the CPNP boundary is WP 1. At the nearest point WP 1 is located approximately 685 m from CPNP. The assessment determined that it is unlikely that the proposed WTGs will have any significant adverse impacts on NPWS aerial operations. Based on Project Amendments, WP 1 has been removed and the closest WTG to CPBP is WP 2, located further away than WP 1, being approximately 1.2 km from the boundary with CPNP.■ BHGNR and the Project share a boundary on the eastern side of the Project Area. 15 WTGs were presented in the EIS as planned to be located in close proximity to this shared boundary (reduced to 13 WTGs based on Project amendments) Turbines will not be placed closer than 83.5 m from the BHGNR boundary. This distance is similar to the extent of the largest rotor blades, therefore the blades will remain clear of BHGNR airspace when in operation. It may however affect where aircraft can fly in close proximity to the boundary. In terms of impacts on aerial firefighting, NSW Rural Fire Service was consulted during the preparation of the AIA and advised as follows: “We have no comments on the proposed wind farm. Wind farms will be treated like any other potential hazard to aircraft operations.”■ Due to the proximity of the WTGs to the BHGNR boundary, there may be an impact on aerial operations within the BHGNR, and particularly when the WTGs are operating. Aircraft may need to manoeuvre around the WTGs, and may have to reorient their flight paths to be able to deploy baits for pest control or surveying.■ To minimise the potential adverse impacts and safety concerns on NPWS aerial operations, the Proponent will engage with NPWS aerial operators to develop procedures, which may include, for example, stopping the rotation of the wind turbine rotor blades prior to the commencement of aircraft operations in close proximity to the western boundary of BHGNR. To assist NPWS, the Proponent will provide the location and height of wind turbines and wind monitoring towers so that it may provide aerial application operators with all relevant information. This information, and a description of the infrastructure, will be provided in suitable GIS format prior to construction.■ The Project commits to maintain ongoing consultation with NPWS in regard to wild dog baiting procedures and fire safety, and work collaboratively with NPWS and the Barnard River Wild Dog Association to ensure these activities can continue with minimal impacts to the objectives of pest control, survey work and firefighting/safety.
NPWS_3	Aviation	<ul style="list-style-type: none">■ Aviation 13.1.4, p. 250: The location and height of wind turbines and wind monitoring towers should be provided to all fire authorities and emergency services in suitable GIS format on an ongoing basis through the construction phase. Emergency services need to have the information pre-populated in operational maps when responding to incidents.	<ul style="list-style-type: none">■ The location and height of wind turbines and wind monitoring towers will be provided to landowners so that the landowner may provide the aerial application pilot with all relevant information. This information, and a description of the infrastructure, will be provided in suitable GIS format to all fire authorities and emergency services in suitable GIS format on an ongoing basis through the construction phase.
NPWS_4		<ul style="list-style-type: none">■ Appendix J, p. 18: Details for aerial firefighting around WTGs are vague. The existence of WTGs reduces flexibility in responding to wildfires. Operational guidelines regarding water-bombing setbacks from WTGs should be developed prior to any fires occurring in the landscape and distributed to fire authorities.	<ul style="list-style-type: none">■ Further consideration of aerial firefighting is discussed in response to comment NPWS_2 above. NSW Rural Fire Service advised:■ "We have no comments on the proposed wind farm. Wind farms will be treated like any other potential hazard to aircraft operations".■ Operational guidelines regarding water-bombing setbacks from WTGs will be developed and distributed to fire authorities.
NPWS_5		<ul style="list-style-type: none">■ Appendix J, p. 19: Figure 7 has a dam labelled “Dam used in bushfires”. The main dam used in bushfires is east of WP26 at 31o 37’ 47”S 151o 8’29”E. Correct Figure 7.	<ul style="list-style-type: none">■ The labelling of the dam in Figure 7 of the Aviation Impact Assessment was incorrect. An updated Figure 7 is provided below.

Reference No.	Theme	Submission	Response
			
NPWS_6	Electromagnetic interference	<ul style="list-style-type: none"> The assessment of potential electromagnetic interference on radio transmissions focusses on commercial transmissions and fails to consider any impacts on NPWS and emergency services VHF radio communications in the area. While the potential might be slight, this needs to be assessed. If approved, the development consent should provide for the Proponent to rectify any issues should they arise. Any impacts in this regard will be a key safety issue for NPWS and emergency service personnel working in this remote area. 	<ul style="list-style-type: none"> An Electromagnetic Interference (EMI) Assessment was completed and included in Appendix I of the EIS (Lawrence Derrick & Associates, 2020). The EMI Assessment considered all licenced services within at least 50 km from the Project boundaries in all frequency bands VHF/UHF and microwave. This included any radio services operated by NPWS and other emergency services including RFS, SES, Police and Ambulance. The assessment listed and discussed any radio links or other services where interference from turbines was possible due to proximity of radio sites or to the ray lines of point to point radio systems crossing the wind farm. The only one in the Emergency Services class (including NPWS) considered to be near enough to turbines was a Rural Fire Service point to point service which was listed in the report (specifically listed in Attachment 8 and Attachment 11 of the EMI Report) (EIS Appendix I). A commitment has been made to conduct a pre-construction assessment to establish a baseline reception strength for comparison with any complaints relating to post-construction reception strength. It also notes that in the event of reception being adversely impacted by the presence of the project, the proponent will implement reasonable and feasible measures to reduce impacts as soon as possible.
NPWS_7	Access	<ul style="list-style-type: none"> Head of the Peel Road and Morrisons Gap Road are on or near Crown Road reserves, for which we understand there are related applications for closure to facilitate the development. Due to terrain, the tracks in use deviate from the legal road reserve. Consistent with existing Crown Road closure protocols, we require a formal easement benefiting NPWS access over the tracks in use as part of the approval process and Crown Road closures. NPWS has legal access to BHGMR and BHGNP via these Crown Roads. The establishment of the easement needs to be a condition of consent if the development and road closures are approved. 	<ul style="list-style-type: none"> Pre-construction, the Proponent will engage with NPWS as part of the Traffic Management Plan to ensure there continues to be ongoing access for NPWS authorised staff and a communication protocol during construction. Ongoing consultation will be undertaken with NPWS to ensure there is appropriate notice to any interruption and access remains possible. The use of Head of the Peel Road for Project traffic has been removed as part of the Amendment Report. The Proponent is in active discussions regarding the establishment of an easement in favour of NPWS across the Project Area and this issue will be resolved as part of tenure arrangements with Crown Lands. Discussions include safety site induction protocols for accessing BHGMR during construction and ongoing access. The improved nature of roads proposed as part of the Project will improve access to authorised people associated with NPWS.
NPWS_8		<ul style="list-style-type: none"> It is assumed that the subject property will not be publicly accessible; otherwise, there is potential impact of traffic and illegal park access due to the upgraded Morrisons Gap road and its proximity to BHGMR. To mitigate potential impacts, the Proponent should be required to fence along the western boundary of BHGMR, including the cleared encroachment on park west of the existing fence-line. In addition, if any problems develop, we recommend that the Proponent contribute to additional signage. 	<ul style="list-style-type: none"> The Project is undertaking additional boundary surveys along the BHGNP/Project Area boundary. The Project commits to work with both the landowner and NPWS for any issues on boundary changes and the potential for the requirement for fencing. General public access to the Project will not be permitted. The Project will have strict site controls for access and health and safety and improved security to the current situation. The Proponent commits to implementing improved signage on any access points into the National Park and induction for site visitors to ensure that the National Park is not improperly entered.
NPWS_9	Biodiversity	<ul style="list-style-type: none"> (In response to Appendix D, p. 3) 1,500 m buffer around footprint includes a significant portion of both BHGMR and CPNP, yet very few survey points were undertaken within this buffer, and only 100 m into BHGMR. NPWS recommends a robust survey be conducted within the 1,500 m buffer. 	<ul style="list-style-type: none"> Following consultation with the EES and NPWS on 12 June 2020 the draft BDAR it was agreed that a number of rapid PCT verification and habitat assessment points would be carried out within BHGMR, where it is adjacent to the development. The field survey methodology for target fauna species that could be subject to indirect impacts as a result of the wind farm operation, specifically birds and bats, would be sufficient to detect any animals that may move through the site and utilise BHGMR. The 1,500 m buffer exists only for assessment of landscape context and connectivity around the Development Footprint. It is a standard requirement of the BAM, and only requires desktop analysis. There is no requirement to undertake detailed survey within the 1,500 m buffer under the BAM. The Proponent has removed 3 turbines assessed as having the potential for high impact to native bat species. This includes the removal of WP 31, adjacent to Ben Halls Gap National Park, and WP 23 and WP 27 all benefiting connectivity impacts to the Ben Halls Gap National Park. The closest turbine to the Crawney National Park, WP 1 has also been removed due to impacts associated with biodiversity, also improving potential connectivity impacts across high condition native vegetation.

Reference No.	Theme	Submission	Response
			<ul style="list-style-type: none">■ The Proponent has updated its commitments in Table 72 “Proposed Mitigation Measures” in Section 8.9 of the Updated BDAR for inclusion in the Biodiversity Management Plan. The following summarises the measures for risk management to residual impacts to neighbouring National Parks and impacts to habitat connectivity:<ul style="list-style-type: none">– Instigating vegetated buffers between the access tracks and wind turbine pads and the National Park estate is to be considered during detailed design. The selection of areas of buffer plantings and species to be planted will be carried out in consultation with the Area Manager, Barrington Tops National Parks and Wildlife Service.– Restore and rehabilitate all areas within the temporary development footprint. Priority should be given to movement corridors for fauna, significant habitats and threatened ecological communities.– Explore opportunities to further minimise the disturbance footprint and clearing within important movement corridors for fauna in detailed design.– Explore opportunities for post-works restoration of habitat connectivity within important movement corridors for fauna.– Areas subject to temporary disturbance will be rehabilitated using a native species planting schedule as much as practicable considering any operational and safety constraints.– The total area exposed and cleared at any one time will be minimised to the extent practicable to allow for fauna movement during construction and periods of temporary disturbance.– The Erosion and Sediment Control Plan will include specific actions to minimise impacts to sensitive receptors associated with the National Park estate, including waterways and the adjacent Sphagnum Moss TEC.
NPWS_10		<ul style="list-style-type: none">■ (In response to Appendix D, p. 73-74) Weather conditions at Quirindi Post Office were used. Murrurundi Gap weather conditions are closer to those experienced in the higher parts of the survey area. The difference in temperature between Quirindi and higher elevations should be noted. Sub-zero temperatures are regularly experienced during winter. Why wasn’t data from the Meteorological Masts located at the site used? NPWS recommends a more accurate assessment of weather conditions be conducted at higher elevations during the survey.	<ul style="list-style-type: none">■ The BDAR has been updated to include a summary of weather conditions from Murrurundi Gap BOM station. This is provided in Chapter 4.1.2 Vegetation Surveys and Timing (refer Appendix D of the Amendment Report).■ The Meteorological Masts used to record the wind speed do not provide equivalent rainfall data.
NPWS_11		<ul style="list-style-type: none">■ (In response to Appendix D, Table 21) Booroolong Frog – known from Barnard River in BHGNP, Wombramurra Creek (close to CPNP) and a tributary to the Isis River in CPNP. NPWS recommends sediment controls to be in place close to origin of potential sediment to prevent soil movement in the landscape and impacting on streams.	<ul style="list-style-type: none">■ An updated assessment has been carried out in Chapter 8.8.6 of the Updated BDAR. Table 58 completes an EPBC Act significant impact assessment for the Booroolong Frog (refer the Updated BDAR in Appendix D of the Amendment Report).■ The updated project design reduces the potential impacts to Booroolong Frog habitat from 1.59 ha to 0.64 ha.■ The Updated BDAR in Chapter 8.5 provides the following response to impacts:<ul style="list-style-type: none">– The Project is unlikely to impact upon rocky habitat supporting the population of Booroolong Frog as direct impacts will not occur to the creek, and indirect impacts will be avoided through mitigation measures outlined in Section 8.9 (of the Updated BDAR).– In order to minimise such impacts, a Soil and Water Management Plan will be prepared, outlining measures for the management and monitoring of surface water quality and hydrology during construction. The plan would also address any requirements for the management of pollutants or contaminated lands during construction so as to minimise impacts to terrestrial and aquatic habitats. The plan would include the implementation of a construction surface water quality monitoring to minimise impacts to surface water quality. An Erosion and Sediment Control Plan will also be prepared, outlining measures for the prevention of erosion and sedimentation during construction. If adequate soil and water management measures are employed, the indirect impacts impact to Booroolong Frog habitat can be effectively managed through best practice construction and operational soil and water management control substantially reduced. Implementation and monitoring of the success of this plan would be a key requirement of the Biodiversity Management Plan.– Additional measures are able to be effectively implemented to appropriately mitigate impacts associated with the identified sensitive location in the adjacent National Park. Measures are to be included in the progressive Erosion Sediment Control Plan (ESCP) to either:<ul style="list-style-type: none">– direct disturbed runoff away from the catchment area identified to avoid the sensitive location; or– process runoff through additional sediment controls (e.g. sumps and/or sediment basins) and discharge at a low, non-erosive velocity (ERM 2021).
NPWS_12		<ul style="list-style-type: none">■ (In response to Appendix D) Ben Halls Gap Sphagnum Moss Cool Temperate Rainforest Endangered Ecological Community occurs adjacent to the proposed project. It is vulnerable to sediment entering the streams due to soil disturbance in track construction. This was identified as an issue in meetings with the Proponent and has not been addressed in the BDAR. NPWS recommends incorporating Ben Halls Gap Sphagnum Moss Cool Temperate Rainforest Endangered Ecological Community in the BDAR assessment, with appropriate mitigating measures.	<ul style="list-style-type: none">■ Ben Halls Gap Nature Reserve is located adjacent to the Project Area, immediately to the east of the ridgeline. In portions of the National Park, Ben Halls Gap Sphagnum Moss Cool Temperate Rainforest EEC has been identified as requiring additional consideration to ensure activities associated with the project do not impact on the integrity of the EEC. The primary risk to impact upon the “sensitive location” is associated with runoff and sediment deposits.■ Section 4.3 of the Updated BDAR makes reference to the location of the Sphagnum Moss TEC in the adjacent Ben Halls Gap Nature Refuge, with the location of this TEC mapped in Figure 8 and confirms that there will be no direct impacts on this area.■ An updated assessment of site gradients and risk to this community is updated in the Soil and Water Addendum Report including project commitments to avoid impact in the EIS (Appendix N of the Amendment Report). Additional measures will be implemented to appropriately and effectively mitigate potential impacts associated with the identified sensitive location in the adjacent National Park. Measures are to be included in the progressive Erosion Sediment Control Plan (ESCP) to either:<ul style="list-style-type: none">– direct disturbed runoff away from the catchment area identified to contain the sensitive location, or

Reference No.	Theme	Submission	Response
			<ul style="list-style-type: none">– process runoff through additional sediment controls (e.g. sumps and/or sediment basins) and discharge at a low, non-erosive velocity (ERM 2021).■ Table 72 in Section 8.9 of the Updated BDAR has also been amended to make reference to new commitments to the management of stormwater and runoff on the Sphagnum Moss TEC.
NPWS_13		■ Appendix D 5.3.2: Refers to survey locations being shown on Figure 9. Figure 9 is not included in the document. Supply Figure 9.	■ All fauna survey locations are shown in Figure 11 (previously Figure 9) of the Updated BDAR (Appendix D of the Amendment Report).
NPWS_14		■ Appendix D: The ridgeline (watershed) is shown in the wrong place. This means O&C and a number of WTGs SW of park drain into park, intersects with headwaters of Brayshaws Creek and Ben Halls Gap Nature Reserve Sphagnum Moss Cool Temperate Rainforest Endangered Ecological Community. Based on this information, there is potential for sedimentation to impact on these creeklines. With correct information, the project area impacts on the Brayshaws Creek catchment, as discussed with the Proponent prior to release of the EIS. Correct the map and develop mitigating measures to prevent sediment impacting Brayshaws Creek and Ben Halls Gap Nature Reserve Sphagnum Moss Cool Temperate Rainforest Endangered Ecological Community.	<ul style="list-style-type: none">■ The 'ridgeline' shown in the BDAR is not representing the topography of the site to influence drainage strategies to manage runoff into the Nature Reserve. These lines broadly show the ecological corridor that run across the ridgelines, as well as vegetated corridors from the ridge to the lower altitude areas. They are not intended to show boundaries of catchments. The Project has committed to ensuring that measures to manage water quality during construction and operation are in place and that all mitigation measures are in line with the Government's Erosion and Sediment Control Blue Book (Landcom, 2004).■ Runoff management has been assessed in an updated Soil and Water Addendum Report (Appendix N of the Amendment Report). NPWS has identified two small catchments in the headwaters of Ben Halls Creek and Brayshaws Creek within the Ben Halls Gap National Park as sensitive waterways and require no sediment to drain to the National Parks. Schematic examples of potential runoff management at the Development Footprint are provided as Figure 5.2 and Figure 5.3 of the updated Soil and Water Addendum Report. In the vicinity of the Ben Halls Gap National Park, the Development Footprint design is primarily in cut – meaning that run-on from undisturbed areas can be diverted away from disturbed areas by catch drains to a stabilised discharge location. Runoff from disturbed areas can be graded away from the National Park catchment to collection drains that convey flows via outlet controls. Runoff from fill batters facing towards the National Park can be retained as sheet flows utilising vegetated filter strips or concentrated in collection drains diverted either via culverts beneath the access tracks to join the northern drainage network or to enhanced sediment controls prior to release.
NPWS_15		■ Appendix D: Site maps reference DPIE, 2020. This is not included in Reference list.	<ul style="list-style-type: none">■ This reference has been included in the reference list of the Updated BDAR to make reference to the DPIE (2020) Biodiversity Values Map.■ Included in updated BDAR (refer Appendix D of the Amendment Report).
NPWS_16	Soil and Water	■ Executive summary, xiv: It is claimed that there is a low-moderate risk of soil erosion in the majority of the Project Area and that a standard suite of erosion and sediment controls may be adopted in most areas. However, some of the area is on steep slopes which has a higher risk of erosion and consequent sedimentation of streams. It is recommended that a standard suite of erosion and sediment controls must be adopted, especially in steep areas.	<ul style="list-style-type: none">■ Additional consideration of soil and erosion potential and erosion and sediment control measures has been included in an updated Soil and Water Addendum Report, provided in Appendix N of the Amendment Report. This has been informed by geotechnical investigations undertaken across the Project Area.■ The Environmental Management Strategy for the Project will incorporate erosion and sediment control measures to be implemented for the Project.
NPWS_17		■ Table 21-1, p. 351: Specify that no sediment is to drain into CPNP or BHGMR/NP.	<ul style="list-style-type: none">■ As stated above, additional consideration of soil and erosion potential and erosion and sediment control measures has been included in an updated Soil and Water Addendum Report, provided in Appendix N of the Amendment Report. This has been informed by geotechnical investigations undertaken across the Project Area.■ Only minor sections of the Project Development Footprint lie within the upper catchments of the national parks. The updated Soil and Water Addendum Report considers a concept approach to erosion and sediment control management in the vicinity of NPWS estate adjacent to the Project, including Crawney Pass National Park and Ben Halls Gap Nature Reserve. Please see response NPWS_11 above for information and reference to the Runoff Management and sections in the Soil and Water Addendum Report.■ The updated BDAR makes the following commitment:<ul style="list-style-type: none">– Additional measures are able to be effectively implemented to appropriately mitigate impacts associated with the identified sensitive location in the adjacent National Park. Measures are to be included in the progressive Erosion Sediment Control Plan (ESCP) to either:<ul style="list-style-type: none">· direct disturbed runoff away from the catchment area identified to contain the sensitive location, or· process runoff through additional sediment controls (e.g. sumps and/or sediment basins) and discharge at a low, non-erosive velocity (ERM 2021).■ The updated Soil and Water Addendum Report makes the following commitments to reduce impacts:<ul style="list-style-type: none">– The drainage design for hardstand and access track infrastructure will aim to direct runoff from all hardstands and access tracks to appropriate sediment control facilities such as sediment basins, grassed filter strips or swales to trap sediments and filtered off before being discharged (to appropriate vegetated areas or drainage lines);– Use of controls such as grass swales with regular rock checks in access track and other constructed drainage lines;– Level spreaders onto naturally vegetated areas at flow outlets to reduce velocities and encourage infiltration;– Installation of geotextile silt fences (with sedimentation basins where appropriate) up-gradient of drainage lines from the site which are likely to receive runoff from disturbed areas;– Installation of appropriate sediment traps or sediment ponds near waterways to contain surface water that may be contaminated with sediment runoff to prevent it from entering the waterway;– Procedures to ensure that steep batters are treated appropriately for sediment control;– A process for overland flow management to prevent the concentration and diversion of water onto steep or erosion prone areas; and

Reference No.	Theme	Submission	Response
			<ul style="list-style-type: none"> Thorough visual inspections following significant rain events with a requirement for immediate remediation of localised erosion caused by runoff (within specified response times).
NPWS_18	Traffic and Transport (of EIS)	<ul style="list-style-type: none"> Map F3-1: Access to the permanent Operations and Maintenance facility is via a track immediately west and adjacent to BHGMR, accessed from Morrisons Gap Road. This presents a risk of illegal entry to BHGMR by staff, contractors or the public. To mitigate this the Proponent should securely fence along the western boundary of BHGMR. NPWS recommends that the fencing plan excludes use of barbed wire in fencing (at least on top and bottom strands), given its impacts to fauna and associated impacts to park values. If required, the Proponent should contribute to additional signage to alert people that it is NR. 	<ul style="list-style-type: none"> Access to the onsite Operations and Maintenance facility is across private property. General public access to the site will not be permitted. The Project will have strict site controls for access and health and safety and improved security to the current situation. The Proponent commits to ensuring improved signage on any access points into the Nature Reserve / National Park and induction for site visitors that the Nature Reserve / National Park is not to be entered.
NPWS_19		<ul style="list-style-type: none"> Table 5-1, p. 92: Label Transverse Track on relevant maps. 	<ul style="list-style-type: none"> The transverse track has been labelled in the updated Project Layout Map, Figures 3-1 to 3-5 inclusive, provided within Appendix A of the Amendment Report.
NPWS_20		<ul style="list-style-type: none"> Table 5-1, p. 92: Access during construction – NPWS potentially requires access 24/7, for example for bushfire response and other emergencies. If access is going to be restricted, appropriate notice should be given, and alternatives arranged. 	<ul style="list-style-type: none"> Pre-construction, the Proponent will engage with NPWS as part of the Traffic Management Plan to ensure there continues to be safe access for NPWS authorised staff as required to safely access adjoining areas controlled by NPWS and a communication protocol during construction. Ongoing consultation will be undertaken with NPWS to ensure there is appropriate notice to any temporary interruptions requiring alternative access arrangements. Appropriate induction procedures will be in place for all on site staff and visitors. Further, clear and ongoing communication protocols will also be established with relevant stakeholders such as NPWS and BCS to ensure notification of key project activities as well as the ability to grant site access where required such as in the event of bushfire. The Proponent is in active discussions regarding the establishment of an easement across the Project site as part of its discussions with Crown Lands and relevant landholders. Discussion include safety site induction protocols for accessing BHGMR during construction and ongoing access. The improved nature of roads proposed as part of the project will improve access to authorised people associated with NPWS.
NPWS_21	Weed management	<ul style="list-style-type: none"> Appendix D 8.3.4, p. 251: Disturbance from weeds, pests and pathogens: NPWS endorses the need for mitigations for these issues to be addressed in a Biodiversity Management Plan (BMP). Biodiversity Management Plan needs to include eliminating weeds that germinate following soil disturbance before they set seed. A protocol for dealing with weeds that encroach into BHGMR or CPNP from the proposed project should be developed. Provide draft BMP documents to NPWS for review prior to implementing. 	<ul style="list-style-type: none"> The Project commits to best practice weed and pathogen management to be detailed within the Biodiversity Management Plan to be prepared as part of the Environmental Management Strategy which will aim to ensure no additional weed incursion into the adjacent National Parks. This will include the management of any topsoil stockpiles and vehicle hygiene protocols. The Biodiversity Management Plan will be prepared in consultation with NPWS.
NPWS_22	Fire management	<ul style="list-style-type: none"> Include a statement that there will be no expectation of additional hazard reduction or other works on neighbouring lands including National Parks and Nature Reserves. 	<ul style="list-style-type: none"> An additional statement has been added to Section 6.1 and Section 6.2 of the updated Bushfire Risk Assessment to confirm that there will be no expectation of additional hazard reduction or other works on neighbouring lands including National Parks and Nature Reserves. The updated Bushfire Risk Assessment is included in Appendix K of the Amendment Report. Concept design has ensured that Asset Protection Zones are included within the Project Boundary. There is no expectation on adjoining land not associated with the project to include these buffers.
NPWS_23		<ul style="list-style-type: none"> Appendix J, p. 36: Fire history directly impacting the Project Area does not include the Caves Fire (2009-10). A number of lightning ignitions south of Liverpool Range in Timor burnt north up the hill and crossed into the Peel Valley. During the 2009-10 Caves Fire there was a re-ignition of an agricultural burn on Head of the Peel property which is also missing from the fire history. Include these fires in Table 5.1 under the Fires directly impacting the Project Area heading. 	<ul style="list-style-type: none"> The Caves Fire has been added to the fire history as presented in Figure 5.1 and discussed in Table 5.1 of the updated Bushfire Risk Assessment within Appendix K of the Amendment Report. Concept design has ensured that Asset Protection Zones are included within the Project Area. There is no expectation on adjoining land not associated with the project to include these buffers. There will therefore be no future expectations for additional hazard reduction on NPWS estate, beyond that which is currently occurring under the park's Reserve Fire Management Strategy.
NPWS_24		<ul style="list-style-type: none"> Appendix J, p. 16: NPWS acknowledges that improvement in the road network will be positive for firefighter access. NPWS supports the proposal to construct all tracks to NSW RFS Fire Trail Standards. 	<ul style="list-style-type: none"> Noted. As a minimum, and to enable access for RFS all roads will be maintained to the minimum standards as outlined within the NSW RFS Fire Trail Standards and the NSW RFS Fire Trail Design, Construction and Maintenance Manual (refer to Appendix B of the Bushfire Risk Assessment). Any deviation from these standards would be confirmed with NSW RFS prior to construction to ensure that safe access is available for RFS vehicles at all times.
NPWS_25		<ul style="list-style-type: none"> Appendix J, p. 10: Proponent suggests further consultation with NPWS and RFS to ensure appropriate mitigation measures are in place if water supply from Nycooma dam is not available. Include a timeframe for this to be completed – for example, if Nycooma dam is not going to be available. Report this to Liverpool Range and Tamworth BFMCs prior to each fire season. 	<ul style="list-style-type: none"> Table 2.2 of the Bushfire Risk Assessment has been updated to confirm that in the event that the large dam is not accessible, further consultation will be undertaken with NSW NPWS and NSW RFS to ensure that appropriate mitigation methods are in place and that a suitable alternative is available in the event of a bushfire in the area. This is to be reported to Liverpool Range and Tamworth BFMC prior to each bushfire season. The updated Bushfire Risk Assessment is included in Appendix K of the Amendment Report. The Proponent will work with relevant landholders, NPWS and NSW RFS to ensure that alternative water supplies are made available during construction. This will also be built into the Construction Management Plan.

Reference No.	Theme	Submission	Response
NPWS_26		<ul style="list-style-type: none"> Appendix J 6.2, p. 63: Strategic Fire Advantage Zones: Appendix J claims that the land east of WTG40 – WTG44 is zoned as SFAZ. This is incorrect as it is Land Management Zone (LMZ). NPWS supports the establishment of an SFAZ west of BHGMR. Correct Appendix J to say: The National Parks' land located to the east of WTG 40 to WTG 44 is mapped in the Ben Halls Gap National Park Fire Management Strategy as a Land Management Zone. SFAZs within the reserve are 2 – 4 km east of the WTGs. 	<ul style="list-style-type: none"> Section 6.2 of the Bushfire Risk Assessment has been updated to confirm that the National Parks' land located to the east of WTG40 to WTG44 is mapped within the Ben Halls Gap National Park Fire Management Strategy as a Land Management Zone, with Strategic Fire Advantage Zones mapped approximately 2-4 km east of the WTG. The updated Bushfire Risk Assessment is included in Appendix K of the Amendment Report.
NPWS_27	General comments	<ul style="list-style-type: none"> 17 (i): Refers to DECC which is outdated. Replace with DPIE (Department of Planning, Industry and Environment). 	<ul style="list-style-type: none"> It is noted that reference to DECC in the abbreviation table of the EIS should read former DECC.
NPWS_28		<ul style="list-style-type: none"> 25 (E.1): Map shows BHGMR shown as NR. Correct this. 	<ul style="list-style-type: none"> Noted. Updated mapping within the Amendment Report labels Ben Halls Gap Nature Reserve, as requested.
NPWS_29		<ul style="list-style-type: none"> Section 12.6.3: We acknowledge and support the training of drivers to respect private property and farm gates. NPWS reserves and other public land should be included in any training as well as private property. 	<ul style="list-style-type: none"> Noted. This will be expanded to include NPWS reserves and other public land as relevant to the Project.
NPWS_30		<ul style="list-style-type: none"> Staff and contractors should be made aware of restrictions on domestic animals in NPs and NRs and that we regularly bait the area using 1080 poison. Staff and contractors should be discouraged from bringing their animals to work in the proposed Project Area. 	<ul style="list-style-type: none"> The Construction Environmental Management Strategy will ensure that no domestic animals will be allowed within the Project Area. This will also be incorporated into the site induction for all construction and operational staff, contractors and site visitors.

Table 5-9: NSW Department of Regional NSW – Mining, Exploration & Geoscience (MEG) Submission Responses

Reference No.	Theme	Submission	Response
MEG_1		<ul style="list-style-type: none">The Proponent states a search of MinView was undertaken in July 2020. The search indicated an intersect with the exploration licence EL8692, held by PTR Resources Pty Ltd, located on the northern portion of the project area. Additionally, a new Exploration Licence Application (ELA6057) was submitted on 12 August 12 2020 by Sentinel Resources (Australia) Pty Ltd. MEG requests that the Proponent contact PTR Resources Pty Ltd and Sentinel Resources (Australia) Pty Ltd to determine their levels of interest.	<ul style="list-style-type: none">An analysis of the Project Area and the Licence application was undertaken which showed that the northern portion of the Project Area does not intersect with the new Exploration Licence Application (ELA6057) lodged by Sentinel Resources Pty Ltd (see figure below).

Table 5-10: WaterNSW Submission Responses

Reference No.	Theme	Submission	Response
WaterNSW_1	Soil and Water (Water quality monitoring)	<ul style="list-style-type: none">A number of WaterNSW water quality monitoring sites and the Pearly Gates gauging station (our ref: 419906) are located where culvert and bridge upgrades activities are proposed to facilitate heavy vehicle movements. Namely, the Peel River along Head of Peel Road, Woodleys Creek & Talbots Creek along Kirks Road and Woodleys Road, and Wardens Brook. As such, WaterNSW requires consultation during the detailed design phase to ensure no impacts occur to WaterNSW assets during construction.	<ul style="list-style-type: none">As part of the Project amendments outlined in the Amendment Report, it is proposed that all Project traffic will access the Project Area via Morrisons Gap Road only. The Head of Peel Road will not be used for Project related traffic and will be for emergency vehicle access only. As such, no road upgrades will occur on the Head of Peel Road, Kirks Road or Woodleys Road, and the WaterNSW water quality monitoring sites and the Pearly Gates gauging station will not be affected by the Project.
WaterNSW_2	Soil and Water (Water quality)	<ul style="list-style-type: none">WaterNSW suggests that the following conditions of consent be included in the determination, to specifically manage and monitor surface water quality and hydrology during construction and protect WaterNSW assets:An operating condition requiring that the Applicant ensures that the development does not cause any impacts on the Chaffey Dam or the quality of water flowing into the Chaffey and Glenbawn catchments.To ensure the adequate protection of WaterNSW water quality monitoring sites, access and equipment, WaterNSW must be consulted during the detailed design phase related to any road upgrade works that facilitate vehicle movement for the project.	<ul style="list-style-type: none">Noted.As stated above, due to proposed Project amendments, no road upgrades will occur on the Head of Peel Road, Kirks Road or Woodleys Road, and the WaterNSW water quality monitoring sites and the Pearly Gates gauging station will not be affected by the Project.
WaterNSW_3	Approvals	<ul style="list-style-type: none">If any water access licencing is required, this should be obtained, once the preferred water supply option is determined.	<ul style="list-style-type: none">Noted.

Table 5-11: Transport for NSW (TfNSW) Submission Responses

Reference No.	Theme	Submission	Response
TfNSW_1	Traffic and Transport	<ul style="list-style-type: none">Any removable signs installed for the construction of the project will require replacement with conventional signage posts at project completion. All other relevant infrastructure removed for the project needs to be replaced as per existing.	<ul style="list-style-type: none">Noted.
TfNSW_2		<ul style="list-style-type: none">Any damage to the state road assets (including but not limited to concrete medians, pavement, or safety barriers) as a result of the project and the associated heavy vehicles will be required to be "made good" by the project.	<ul style="list-style-type: none">Noted.
TfNSW_3		<ul style="list-style-type: none">Any roadwork on classified (State) road/s is to be designed and constructed in accordance with the current Austroads Guidelines, Australian Standards and TfNSW Supplements.	<ul style="list-style-type: none">Noted.
TfNSW_4		<ul style="list-style-type: none">Any modification to the state road assets will require the Proponent to enter into a Works Authorisation Deed (WAD) with TfNSW for any roadwork deemed necessary on the classified (State) road. The developer will be responsible for all costs associated with the roadwork and administration for the WAD.	<ul style="list-style-type: none">Noted.
TfNSW_5		<ul style="list-style-type: none">Figure 3.12 of the TTA - There is a section of median safety barrier (Elsholz kerb) that is proposed to be removed at the intersection of Industrial Drive (MR316) and the Pacific Highway (HW10) / Maitland Road. The time-line indicates a delivery window of 9 months. Further details are required by TfNSW for review to understand how this safety component is proposed to be maintain during the 9 month delivery period.	<ul style="list-style-type: none">An updated Route Assessment has been completed by Rex J Andrews (RJA). The updated assessment confirms that for the worst case 170 m rotor, at the intersection of Industrial Drive and the Pacific Highway / Maitland Road the following works are required:<ul style="list-style-type: none">The blades will need to cross to the incorrect side 150 metres prior to the intersection, then return to the correct side 120 metres past the intersection. No road modifications required."The updated Route Assessment is provided in Appendix I of the Amendment Report.
TfNSW_6		<ul style="list-style-type: none">Figure 3.13 of the TTA - John Renshaw Drive onto Hunter Expressway – The project proposes to construct a new crossover of Hunter Expressway (HEX) median instead of utilising existing crossover West of Wallis Creek (existing crossover will require Wire Rope Safety Barrier to be dropped during movements). Further clarification is required to understand the justification for this proposal.	<ul style="list-style-type: none">An updated Route Assessment has been completed by Rex J Andrews (RJA). The updated assessment confirms that for the worst case 170 m rotor, at John Renshaw Drive onto Hunter Expressway, the Project will utilise the existing crossover.<ul style="list-style-type: none">"The blades will need to cross to the incorrect side then down the off-ramp onto the incorrect side of the expressway. Approx 600 metres along the expressway there is a break in the road, which will allow the blades to cross back to the correct side of the expressway, this may require additional hardstand. Traffic control and or police will be required to perform this procedure (pp28)."The updated Route Assessment is provided in Appendix I of the Amendment Report.Following further consultation with TfNSW these movements will occur at nights and not in peak times.

Reference No.	Theme	Submission	Response
TfNSW_7		<ul style="list-style-type: none"> The Route Assessment will need to be reassessed to cater for new road infrastructure / upgrades completed from 2019 to 2022 and also take into consideration any proposed works under construction during the project's new construction phase. Noting that projects may yet to be identified. 	<ul style="list-style-type: none"> New road infrastructure projects / upgrades, either planned or in construction, have been considered in Section 9 of the Traffic and Transport Addendum Report (TTPP, 2021), provided in Appendix H of the Amendment Report. The assessment considered: Golden Highway upgrades: <ul style="list-style-type: none"> Belford to Golden Highway: involving the widening of the New England Highway to provide a divided road with two lanes in each direction between Belford and the Golden Highway replacing the existing right turn movement from the Golden Highway to the New England Highway with a flyover and a roundabout on the Golden Highway with a connection to the New England Highway. Particular attention will need to be considered given that construction of the Belford to Golden Highway project has begun. The transport analysis has included an assessment of the route when completed and before completion. Mudies Creek Bridge: new crossing at Mudies Creek and upgrading of six kilometres of highway between Whittingham and Mount Thorley. New England Highway upgrades: <ul style="list-style-type: none"> Camberwell: installing one metre wide centreline, widening the highway on approach to Glennie Street, installing audio-tactile line marking, upgrading drainage, installation of roadside safety barrier and improving line markings. This project is expected to have minimal impact on the Project. Muswellbrook Bypass: 9.1 km new highway, refine alignment south of Coal Road, and southern and northern connections with the existing New England Highway. While the Muswellbrook Bypass project could potentially have significant benefits for the Project, the bypass project is in early planning phase and is unlikely to begin construction within the timelines of the Hills of Gold Wind Farm Project. The Belford to Golden Highway project is likely to be the most significant impact on the Project. As part of the Traffic Management Plan, the Project will maintain communications with TfNSW project managers to identify potential impacts. This will include notification of the times when trucks will be travelling through the construction sites.
TfNSW_8	Traffic and Transport (carpooling)	<ul style="list-style-type: none"> There does not appear to have been any consideration towards carpooling arrangements for those travelling to site in the Light Vehicles to reduce the volume of traffic generated by these staff movements. 	<ul style="list-style-type: none"> Carpooling has been considered in Section 6.2 of the Traffic and Transport Addendum Report (TTPP, 2021), provided in Appendix H of the Amendment Report. The Proponent will implement a carpooling system for staff travelling to the Project Area.
TfNSW_9	Maps and Figures	<ul style="list-style-type: none"> Figure 3.2 of the TTA indicates the Traffic Routes for the staff vehicles in addition to the plant equipment and construction materials vehicles. However, the figure does not provide labels for the relevant roads, the legend appears mislabeled and the connections to the New England Highway do not appear to match the description of the staff and plant/materials vehicle movements. 	<ul style="list-style-type: none"> An updated figure outlining the construction traffic routes for the Project, as amended, is provided in Figure 4.1 of the Traffic and Transport Addendum Report, provided in Appendix H of the Amendment Report, with discussion regarding construction traffic distribution provided in Section 4.6 of the report.
TfNSW_10	Traffic and Transport (intersection analysis)	<ul style="list-style-type: none"> There does not appear to have been any intersection analysis undertaken for the indicated routes at key locations on the classified (State) roads for the traffic generated by the project. All references to intersection analysis throughout the EIS and TTA are in relation to the transportation of the OSOM movements only. TfNSW recommends further intersection analysis be undertaken, including Austroads Turn Warrant assessments, to address the impacts of the increase in traffic generated by the development at key intersections along the traffic route as indicated in Section 3.3.2 of the TTA. This analysis should address any existing or proposed turn treatments or mitigation measures to manage the increase in traffic and should clearly identify the exact routes proposed to be used by the project. 	<ul style="list-style-type: none"> Further intersection analysis has been undertaken on the transport route at key intersections on the classified roads and presented in Section 5 of the Traffic and Transport Addendum Report (TTPP, 2021), provided in Appendix H of the Amendment Report. The key intersections in Tamworth LGA modelled included: <ul style="list-style-type: none"> Goonoo Goonoo Road (NEH) / Scott Road / Vera Street (Tamworth) Murray Street / Marius Street (Tamworth) New England Highway / Nundle Road (Tamworth) Lindsay Gap Road and Nundle Road (Nundle) Oakenville Street and Jenkins Street (Nundle) The modelling shows that each of the intersections modelled would perform acceptably with and without the construction traffic from the Hills of Gold Wind Farm. The poorest performing intersection was the New England Highway and Nundle Road. At this intersection the movement with the highest average delay was from the north on Railway Street. This is a minor street, with 12 vehicles an hour on approach the average delay for the through movement was 38 seconds in the existing case and 39 seconds in the case with the construction vehicles. The 95th percentile queue would be less than 1 vehicle on all approaches. Queueing at all intersections modelled was modest with 95th percentile queues of less than 20 m at all intersections. The largest queues were modelled at the intersection of Murray Street and Marius Street. TfNSW were concerned with the impacts at the intersection of New England Highway and Nundle Road and the right turn from the New England Highway to Nundle Road in the morning peak. Modelling indicates that the 95th percentile queue for this right turn would increase from 1 m to 4 m (i.e. less than 1 vehicle at all times). While the queue from the worst performing approach, being Railway Street, would also be less than 1 vehicle. The modelling shows that the construction traffic would have minimal impact on the road network operation in both the morning and evening peaks.

Reference No.	Theme	Submission	Response
TfNSW_11	Traffic and Transport (Alternative route)	<ul style="list-style-type: none">■ Section 3.6.4 of the TTA refers to an Alternative Route via Tamworth, proposed as an alternative to the project's proposal to widen bridges on Lindsays Gap Road. Preliminary advice provided by TfNSW to TTPP (25 September 2020) highlighted the need to further address this information in regards to providing clear route details of the Alternative Route, identify the load limits on bridges, expand on the potential options to widen bridge/s and clarify the axle widths of the Over Size Over Mass (OSOM) design vehicles.■ Although the documentation appears to state that the OSOM vehicles transporting the Tower units will be the only vehicles needing to utilise the Alternative Route, it is unclear if the vehicles transporting the blades (or any other OSOM vehicle) are also impacted by the existing width of the bridge. Section 10 of the Transport Route Assessment (page 34) appears to indicate that although the blades sitting on the trailers would clear the bridge structure/s, it is the axle width of the relevant design vehicles that determines if this route is viable for those items. It is not clearly stated that the vehicle / trailer can cross these bridges.	<ul style="list-style-type: none">■ The alternative route via Tamworth is no longer proposed.■ An updated Route Assessment has been completed (refer to Appendix I of the Amendment Report).■ Section 10 (pages 32 and 33) of the updated Route Assessment identify that the transportation of the blades across both the Goonoo Goonoo Creek Bridge and Middlebrook Creek Bridge will fit over the existing structures. However Goonoo Goonoo Creek Bridge would require widening and upgrading for OSOM loads with axles exceeding 3.5 m. Middlebrook Creek Bridge may require upgrading for OSOM with a trafficable deck width of at least 4.6 m.
TfNSW_12	Traffic and Transport (Alternative route)	<ul style="list-style-type: none">■ Section 3.7.2.2 states that Tamworth Regional Council have not raised any objections to the upgrade of the Goonoo Goonoo Creek Bridge and indicates further details are available in Section 3.8.1 & Appendix C – Copy of the Meeting Minutes. This addresses the consultations with the council. There is no clear statement from Council as to their response or position with the bridge/s proposal & without any details about the works required to widen & strengthen the bridge structures, TfNSW are unable to rely on these works going ahead & therefore require further information about the proposed Alternative Route via Tamworth.	<ul style="list-style-type: none">■ The alternative route via Tamworth is no longer proposed.■ Ongoing consultation is being undertaken with TRC relating to road upgrades associated with the Project. TRC has not provided any feedback relating to proposed upgrades to the Goonoo Goonoo Creek Bridge or the Middlebrook Creek Bridge.
TfNSW_13	Traffic and Transport (OSOM)	<ul style="list-style-type: none">■ The Over Size Over Mass (OSOM) movements for the project are extreme and will bring with them a level of risk to other road users, to State owned infrastructure and also to network efficiencies.■ The proposed trailer combination that extends to approximately 92m in length is a dimension that has not been tested in NSW previously and the true impact is unknown.■ Further consultation should be undertaken with TfNSW Regional Infrastructure to ensure the proposed works to accommodate the transportation of the larger blade lengths are in accordance with TfNSW requirements.	<ul style="list-style-type: none">■ It is acknowledged that this Project will use the largest turbine blades to date in this area and previous blades to use this route were 62 m. However, the State Government's policy is for the New England area of NSW to become a Renewable Energy Zone (REZ). This means that the Hills of Gold Wind Farm is one of many projects in this area that will contemplate using similar sized blades, or larger.■ As the routes have not been used for this sized blade it is proposed that before the transportation of 'live' loads that dummy runs of each of the routes are completed using simulated loads that have the same height width and length. Once the route is demonstrated to be safe for transportation, then the transport of the loads could commence.■ The Project will consult with TfNSW Regional Infrastructure prior to OSOM transportation commencing.
TfNSW_14		<ul style="list-style-type: none">■ Vehicles identified in the Route Assessment as completely blocking the classified and local road/s during turning manoeuvres, will require police escorts, a Traffic Control Plan (TCP) and a Road Occupancy Licence (ROL), for these and other manoeuvres along the designated route/s, to prevent interactions with approaching vehicles. These processes will include further TfNSW reviews of the proposed manoeuvres.	<ul style="list-style-type: none">■ Noted.
TfNSW_15		<ul style="list-style-type: none">■ The blades and towers must be transported at very low traffic times between Newcastle and Denman, including, if necessary, staging of the movements to avoid peak mining traffic periods in the Hunter Valley.	<ul style="list-style-type: none">■ Noted.■ The Proponent will engage with local authorities and businesses in relation to traffic movements and the avoidance of peak commuter times. This will be addressed in the Traffic Control Plan (TCP) to be prepared prior to OSOM transportation commencing.
TfNSW_16		<ul style="list-style-type: none">■ TfNSW Transport Operation Managers would require confirmation of completed works and the Transport Management Plan (TMP) would need to be formally tabled with the OSOM Road Access team for further review prior to any permits being issued.	<ul style="list-style-type: none">■ Noted.
TfNSW_17		<ul style="list-style-type: none">■ Approvals from land holders and road managers will be required prior to the project commencing.	<ul style="list-style-type: none">■ Noted. All necessary consents and land tenure for the Project will be obtained prior to relevant works commencing.■ An updated Route Assessment has been completed by Rex J Andrews (RJA) (Appendix I of the Amendment Report). The assessment confirms that fewer land owners are now required as part of the any proposed upgrades and overhang. Revised Lot and DPs associated with the transport route are detailed in Appendix B of the Amendment Report.
TfNSW_18		<ul style="list-style-type: none">■ The Route Assessment indicates the use of Kelly Street in Scone via the rail level crossing for OSOM vehicles. TfNSW recommends the project investigates the use of the Scone Bypass as an alternative.	<ul style="list-style-type: none">■ An updated Route Assessment has been completed by Rex J Andrews (RJA). The assessment confirms that the OSOM transport route will utilise the New England Highway (Scone bypass) and will not utilise Kelly Street Scone, nor the rail level crossing.■ The updated Route Assessment is provided in Appendix I of the Amendment Report.

Table 5-12: Crown Lands (CL) Submission Responses

Reference No.	Theme	Submission	Response
CL_1	Crown Lands	<ul style="list-style-type: none"> The document notes that the Project has excluded the use of Crown Reserves, however the ancillary development footprint for access alteration includes potential significant impacts to Lot 440 of DP 822503, which is Crown reserve 85916 for Public Recreation (P107 of report). This reserve has high value for community amenity and environmental conservation. 	<ul style="list-style-type: none"> Lot 440 DP 822503 is included with Table 4-3 of the EIS which identifies the allotments subject to proposed road upgrades and transmission line access roads. Lot 440 DP 822503 is associated within the road upgrades to the Devil's Elbow. Section 4.2.3 of the EIS refers to Crown land within the Project Area, stating that 'The Project has excluded use of Crown Reserves'. The Proponent clarifies that 'the Project Area has excluded use of Crown Reserves'. However, Crown Reserve 85916 occurs outside of the Project Area, but within the area identified for road upgrades associated with the transport route. The environmental impact of the road upgrades has been considered in the EIS and associated technical assessments. In order to further avoid impacts to heritage assets around the Devil's Elbow and other road upgrades, the Project has subsequently updated the road upgrade design such that Crown Land Lots 7350 DP 1178939 and Lot 439 DP 822503 will also be impacted. The Project therefore requires a Licence to be granted by the Minister under the Crown Land Management Act 2016, which may require compliance with the future act processes under the Native Title Act and the Proponent has commenced discussions with the Native Title claimant. It is noted that Lot 7350 has been transferred to Council following an order made in a Government Gazette published in 2008 and so is no longer Crown land. Consultation is ongoing with Tamworth Regional Council relating to impact associated with this upgrade.
CL_2	Consultation	<ul style="list-style-type: none"> Any development within the Reserve would require negotiation with the reserve manager, Tamworth Regional Council. Some forms of development may not be possible without Ministerial consent sought via consultation with this Department. 	<ul style="list-style-type: none"> The Project has continued to engage with Council in relation to the use of Crown Lands following the publication of the EIS. Updates to this consultation include: <ul style="list-style-type: none"> Appointment of a Civil Engineer to prepare detailed design drawings of the proposed upgrades. Updated designs for the proposed engineering upgrades to the Devil's Elbow submitted to Council for review and comment. Site visits carried out with the Soil Conversation Service. Amendment to the Statement of Heritage Impacts following consultation with Council. Geophysical and Geotechnical investigations conducted across the proposed upgrade site to determine associated impacts. Searches for Indigenous Land applications have been completed. Engagement with Native Title applicants is ongoing.
CL_3	Consultation	<ul style="list-style-type: none"> Any impact to Crown Reserves or Crown Waterways must involve consultation with the relevant local Crown Lands office prior to the implementation of any works. 	<ul style="list-style-type: none"> The Project has and will continue to consult with Crown Lands on the proposed upgrade to the Devil's Elbow and any other effected Crown Reserves. An application will be made for licences to use land associated with the Project.

Table 5-13: Rural Fire Service (RFS) Submission Responses

Reference No.	Theme	Submission	Response
RFS_1	Bushfire (Bushfire Risk Management Strategy)	<ul style="list-style-type: none"> The bush fire risk management strategies – table 13.11, as reported in section 13.4 of the Environmental Impact Assessment shall be incorporated in any consent granted. The Bush Fire Risk Management Strategy shall also include a detail site plan identifying, using GPS coordinates, each turbine tower location and be incorporated into the Bush Fire Emergency Management and Operations Plan. A copy of the plan shall be stored at the NSW RFS Liverpool Range District office. 	<ul style="list-style-type: none"> Noted. The Bushfire Risk Assessment has been updated to include this recommendation. The updated Bushfire Risk Assessment is provided in Appendix K of the Amendment Report.

Table 5-14: Department of Defence (Defence) Submission Responses

Reference No.	Theme	Submission	Response
Defence_1	Aviation	<ul style="list-style-type: none"> Request that the applicant provide Airservices Australia with "as constructed" details. 	<ul style="list-style-type: none"> 'As Constructed' details will be provided to Airservices Australia for their records.
Defence_2	Aviation (Obstacle lighting)	<ul style="list-style-type: none"> If CASA determines that obstacle lighting is to be provided, it should be compatible with persons using night vision devices. If LED lighting is proposed, the frequency range of the LED light emitted should be within the range of wavelengths 665 to 930 nanometres. 	<ul style="list-style-type: none"> Obstacle lighting, if required, will be implemented in accordance with the requirements of CASA, including compatibility with night vision devices.

Table 5-15: Airservices Australia (Airservices) Submission Responses

Reference No.	Theme	Submission	Response
Airservices_1	Aviation	<ul style="list-style-type: none">■ The Scone MSA will require permanent amendment in the Northern sector from 6300ft to 6400ft AHD.■ The start altitude for the RNAV-Z (GNSS) RWY 29 procedure will require permanent amendment to 6400ft AHD.■ The air route H99 will require permanent amendment of the minimum safe altitude from 6100ft to 6400ft AHD.■ Airservices recommends that both aviation operators and the airport are consulted to ensure that all stakeholders fully understand the extent of the impact of these proposed changes.■ Any Airservices work associated with amending the flight procedures will be undertaken on a commercial basis and require further consultation.	<ul style="list-style-type: none">■ Noted. A commercial agreement will be reached with Airservices to amend the flight procedures. Consultation will be undertaken with relevant aviation operators and Scone Airport.

Table 5-16: Civil Aviation Safety Authority (CASA) Submission Responses

Reference No.	Theme	Submission	Response
CASA_1	Aviation (Obstacle lighting)	<ul style="list-style-type: none">■ Recommends that the wind farm is obstacle lit with steady medium intensity red lighting in accordance with the National Airports Safeguarding Framework Guideline D, and section 9.31 of Part 139 Aerodromes Manual of Standards.	<ul style="list-style-type: none">■ Following ongoing consultation with the project, CASA have approved the use of steady low intensity lighting (200 candela) rather than medium intensity. This requirement has been added to the revised Mitigation and Management Measures in Section 8 of the Amendment Report. The project will continue to consult with CASA in the preparation of the lighting design. A copy of the Aviation Impacts Advice letter and consultation with CASA is attached at Appendix J of the Amendment Report.
CASA_2		<ul style="list-style-type: none">■ CASA is prepared to review a lighting plan that indicates which turbines are proposed to be lit. CASA does not consider the effect of lighting on neighbours, however, notes there are recommended treatments listed in Section 9.2 Table 17 of the AIS.	<ul style="list-style-type: none">■ A lighting plan has been developed according to the relevant requirements published in Manual of Standards Part 139—Aerodromes and in consultation with CASA. Section 9.31 (8) specifies that medium-intensity obstacle lights must be provided on a sufficient number of individual wind turbines to indicate the general definition and extent of the wind farm, but such that intervals between lit turbines do not exceed 900 m. This has since been revised to low intensity lighting as detailed in the response above.■ Aviation Projects has advised that based on their experience, this generally results in approximately half of the turbines having lights installed on them.■ A response from Aviation Projects is provided in Appendix J of the Amendment Report.
CASA_3		<ul style="list-style-type: none">■ The EIS Section 3.2.3 Wind Turbine Generators ‘Obstacle Lighting’ advises that two flashing red medium intensity lights per turbine may be required. CASA expects that flashing lights would be excessively environmentally severe. The remainder of the section on obstacle lighting is accurate. CASA has no issues with Section 11.4.3 Night Lighting.	<ul style="list-style-type: none">■ Noted. Obstacle lights will be set to ‘steady’ to reduce the visual impact on neighbouring properties. This requirement has been added to the revised Mitigation and Management Measures in Section 8 of the Amendment Report.■ A response from Aviation Projects is provided in Appendix J of the Amendment Report.
CASA_4	Aviation (Collision risk)	<ul style="list-style-type: none">■ The turbines will reach a height of 230 m (755 ft) above ground level. While pilots are required to fly no lower than 500 ft above the ground or any object on the ground, a pilot could be off track or at a low level due to weather related events, navigation difficulties or other circumstances including controllability issues. The charting of a wind farm is one mitigator but does not eliminate the risk of an aircraft colliding with a turbine.	<ul style="list-style-type: none">■ An Obstacle Lighting Plan has been prepared and agreed with by CASA.■ A response from Aviation Projects is provided in Appendix J of the Amendment Report, together with the Obstacle Lighting Pan and CASA correspondence.
CASA_5	Aviation (Consultation)	<ul style="list-style-type: none">■ Further to Recommendation 1, on commencement of the installation of the first turbine or 155 m high Wind Monitoring Tower if preceding the turbines, Airservices Australia should be requested to publish a NOTAM advising pilots that construction of tall structures is imminent. Details can be reported to the Airservices Australia Vertical Obstacle Database (VOD)	<ul style="list-style-type: none">■ Noted. This requirement has been added to the revised Mitigation and Management Measures in Section 8.
CASA_6	Aviation (Consultation)	<ul style="list-style-type: none">■ Further to Recommendation 6, AIS section 3.15 advises that aerial firefighting operations are conducted in day Visual Flight Rules. CASA recommends additional consultation with the NSW Rural Fire Service regarding the possibility of night aerial firefighting operations using night vision apparatus as there is a trend towards night aerial firefighting.	<ul style="list-style-type: none">■ NSW Rural Fire Service was consulted during the preparation of the AIA and advised as follows: “We have no comments on the proposed wind farm. Wind farms will be treated like any other potential hazard to aircraft operations.”
CASA_7	Aviation	<ul style="list-style-type: none">■ Further to Recommendation 9, CASA recommends that the following Australian Standards be considered regarding the overhead transmission lines:<ul style="list-style-type: none">– AS 3891.1, Air navigation — Cables and their supporting structures — Marking and safety requirements, Part 1: Marking of overhead cables and supporting structures.– AS 3891.2, Air navigation — Cables and their supporting structures — Marking and safety requirements, Part 2: Low-level aviation operations.	<ul style="list-style-type: none">■ Noted.

Reference No.	Theme	Submission	Response
CASA_8	Aviation (Obstacle lighting)	<ul style="list-style-type: none">Further to Recommendation 11, the five Wind Monitoring Towers in the order of 155m AGL must be marked to some extent, depending on the proximity to the surrounding turbines. If the Wind Monitoring Towers are to be installed before the turbines, then they should incorporate a medium intensity red obstacle light at night.	<ul style="list-style-type: none">Marking: this comment is noted, and a requirement has been added to the revised Mitigation and Management Measures in Section 8.Lighting: - this comment is noted, and a requirement has been added to the revised Mitigation and Management Measures in the Amendment Report.

Table 5-17: Forestry Corporation of NSW Submission Responses

Reference No.	Theme	Submission	Response
FCNSW_1	Project Support	<ul style="list-style-type: none">FCNSW consent to the proposal contingent on compliance by the developer with all regulatory requirements that relate to the establishment of the proposed development.	<ul style="list-style-type: none">Noted.

Table 5-18: City of Newcastle (CoN) Submission Responses

Reference No.	Theme	Submission	Response
CoN_1	Soil and Water (stormwater infrastructure)	<ul style="list-style-type: none">Potential damage to CoN's stormwater infrastructure caused by the heavy vehicle turning paths proposed at Selwyn Street, George Street and Industrial Drive. CoN would seek financial compensation for any damages to the stormwater assets resulting from the proposed traffic movements.Recommended that prior to the drafting of the Submissions Report the applicant consult with CoN's Assets Coordinators to discuss options available to address the above concern. Prior to the meeting the applicant should undertake a utilities search including locations of all underground CoN stormwater pipes, in addition to all other private / public utilities in this area.An electronic copy of a dilapidation report prepared by a suitably qualified person for both pre and post works and transport will be required to submitted to CoN prior to the commencement of any of the proposed works on public roads.	<ul style="list-style-type: none">CoN's position regarding damage to infrastructure is noted.As recommended by CoN, the Proponent has discussed the concerns raised with CoN's Asset Coordinators. The transport route has been surveyed by Rex J Andrews and it is not expected that any damage to CoN's stormwater infrastructure will occur. However, to mitigate any potential impacts, the Proponent will:<ul style="list-style-type: none">Undertake a utilities search as part of detailed design for the project after the transport & logistics contractor is engaged and the turbine technology is selected.Take steps to avoid impacts to CoN's stormwater infrastructure as much as practicable.Undertake a site inspection with CoN's engineers prior to any works being undertaken on public roads in the Newcastle LGA.Obtain Section 138 permits from CoN for any road modifications required on public roads, as necessary.Provide 48 hrs notice to CoN prior to any works being undertaken on public roads.The Proponent will provide an electronic copy of a dilapidation report prepared by a suitably qualified person for both pre and post works to be submitted to CoN prior to the commencement of any works on CoN's public roads, unless otherwise agreed with CoN.The Proponent will repair or pay the costs of any damage to public infrastructure caused by the Project.
CoN_2	Traffic and Transport (Heavy vehicle movements)	<ul style="list-style-type: none">Hardstand will be required where the boundary fence is being relocated between TfNSW and CoN land.	<ul style="list-style-type: none">Noted. The Proponent will construct hardstand where the boundary fence is being relocated between TfNSW and City of Newcastle land.
CoN_3	Approvals	<ul style="list-style-type: none">A separate application must be lodged by the applicant and consent obtained from CN for all works within the road reserve pursuant to Section 138 of the Roads Act 1993 (NSW).The proposed widening of George Street will also require the prior consent of TfNSW before any approval granted by CoN.TfNSW approval of a Road Occupancy Licence (NSW Transport Management Centre) and Works Authorisation Deed agreement is required as works involve their assets (e.g. median, traffic signals) for all roads in the Newcastle LGA except for Selwyn Street and George Street.	<ul style="list-style-type: none">Noted. Approvals with be sought from the relevant road authorities prior to works commencing.
CoN_4	Traffic and Transport	<ul style="list-style-type: none">The proposed hardstands are not to involve any changes to the line marking on the road so that the existing arrangement of travel lanes remains the same. Where roads are significantly widened and do not possess edge lines, edge/centre lines are to be provided.	<ul style="list-style-type: none">Noted. The Proponent will give effect to this requirement.
CoN_5	Traffic and Transport	<ul style="list-style-type: none">'No Stopping' restrictions to be provided along the proposed hardstands to prevent vehicle parking on these areas for the duration of their required use.	<ul style="list-style-type: none">Noted. The Proponent will give effect to this requirement.
CoN_6	Traffic and Transport	<ul style="list-style-type: none">For removable / sleeved signposts security head bolts are to be used to affix posts.	<ul style="list-style-type: none">Noted. The Proponent will give effect to this requirement.
CoN_7	Traffic and Transport	<ul style="list-style-type: none">The oversized and over mass routes are only to be used during the night time.	<ul style="list-style-type: none">Noted. The Proponent will give effect to this requirement, unless otherwise agreed with CoN. Travel restrictions will be formalised within transport permits, as required for the Project.

Table 5-19: Muswellbrook Shire Council (MSC) Submission Responses

Reference No.	Theme	Submission	Response
MSC_1	Traffic and transport	<ul style="list-style-type: none"> ■ Traffic and Transport Assessment should have noted the information and recommendations of: <ul style="list-style-type: none"> – a. Thomas Mitchell Drive Contributions Study (prepared by GHD for DPIE); and – b. Muswellbrook Mine Affected Roads Network Plan Review (prepared by Bitzios Consulting and Northrop for Muswellbrook Shire Council). 	<ul style="list-style-type: none"> ■ The Traffic and Transport Addendum Report (TTPP, 2021), provided in Appendix H of the Amendment Report includes an analysis of: <ul style="list-style-type: none"> – Muswellbrook Mine Affected Roads Network Plan, Bitzios Consulting, April 2020: The plan identified a number of road network upgrades including a western corridor connecting the Golden Highway to New England Highway and an inner link road. The plan also makes reference to the Muswellbrook Bypass that is proposed by TfNSW. It is noted that none of the proposed projects have any commitment at this stage and it is understood that Muswellbrook Shire Council is in a process of developing an apportionment plan for the construction and upgrade of these roads. – Thomas Mitchell Drive Contributions Study, GHD May 2015: The Thomas Mitchell Drive Contributions Study (GHD May 2015) was commissioned by the NSW Department of Planning and Environment to establish a framework for the allocation of funding for the upgrade and maintenance of Thomas Mitchell Drive. Thomas Mitchell Drive is a local road and is funded by Muswellbrook Shire Council. This means that Council is responsible for the maintenance and upgrade of the road. However, the road is heavily used by the mining industry with local mines using the road to transport heavy equipment and by workers commuting to site. As such the study suggests that the road should be declared as either a state road or regional road which would allow funding from the state government. However, the study considered models for funding that included a user pay model where the mines pay for their use of the road and allocates the funding for the road to different road users. ■ The studies reviewed do not indicate any clear commitment to particular infrastructure upgrades or the relative timing. However, it is clear from the studies that Muswellbrook Shire Council is managing how its roads are used for heavy industries such as mining and considering how users would contribute to the use of the local roads. ■ OSOM vehicles will need to use local roads through Muswellbrook due to the existing constraints on the New England Highway. The Project will continue to work with Council to develop an agreed contributions process for the fair use of local roads within the Muswellbrook LGA. In addition, dilapidation of the roads will to be managed in consultation with Muswellbrook Shire Council to ensure that the Project does not have an impact on the road infrastructure.
MSC_2	Traffic and transport	<ul style="list-style-type: none"> ■ Council objects to the use of the roads in Muswellbrook Shire that have been identified in the Environmental Impact Statement, as the roads are not appropriate for the proposed traffic generated by the Project. 	<ul style="list-style-type: none"> ■ The Amendment Report outlines proposed changes to the Project since the exhibition of the EIS. The changes have been assessed in the Traffic and Transport Addendum Report in Appendix H of the Amendment Report. ■ Following consultation with Muswellbrook Shire Council, the Proponent is including optionality for the OSOM transport route through Muswellbrook, and includes the following route options. The transport route optionality is discussed in the Traffic and Transport Addendum Report (TTPP, 2021), provided in Appendix H of the Amendment Report: The proposed routes are: <ul style="list-style-type: none"> – Route 1 (blades and loads over 5.2 m) – Via Golden Highway, Denman Road, Bengalla Road, Wybong Road, Kyuga Road, Invermein Street, Stair Street, Dartbrook Road to New England Highway. – Route 2 (loads up to 5.2 m) – Via New England Highway, Bell Street, Victoria Street, New England Highway. – Route 3 (loads over 5.2 m) – Via Golden Highway, Denman Road, Thomas Mitchell Drive, New England Highway, Bell Street, Victoria Street, New England Highway. – Route 4 (standard loads) – New England Highway. – The Project is considering three options for route selection: – All OSOM loads via Route 1 with standard loads using Route 4 the New England Highway. – 100% of loads (other than blades) on Route 2 and 3 with blades using Route 1 and standard loads on Route 4. – Splitting the loads 50/50 between Route 1 and Route 2 and 3, with all blades using Route 1 and standard loads using Route 4. ■ Consultation has been undertaken with Muswellbrook Shire Council and updates to the proposed traffic routes and volumes proposed routes and impact assessment has been carried out. ■ In addition to this, commitments are made to assessing structure integrity and undertaking upgrades were required along with voluntary commitment to pay a road usage fee. A voluntary contribution offer to MSC is provided in Appendix F of the Traffic and Transport Addendum report (refer Appendix H of the Amendment Report). An updated Letter of Offer was forwarded to Muswellbrook Shire Council on 18 October 2021 (refer Appendix H of the Amendment Report).

Table 5-20: Tamworth Regional Council (TRC) Submission Responses

Reference No.	Theme	Submission	Response																										
TRC_1	Traffic and Transport	<ul style="list-style-type: none">Traffic in Nundle will more than quadruple in the mornings between the hours of 7:00am and 8:00am during the period peak construction activity. How does the Proponent propose to mitigate this issue during the construction phase? What measures are in place to minimise disruption to the Nundle and its community during the peak construction phase?	<ul style="list-style-type: none">The Project has made significant amendments to proposed construction and Over Size / Over Mass (OSOM) vehicle movement routes to address concerns raised by Tamworth Regional Council and other community submissions from residents in Nundle.The traffic and transport impacts in the EIS considered that an option for an alternate route be considered for 20% of OSOM and construction traffic, namely on Gill Street, Innes Street, Jenkins Street, Happy Valley Road, Head of Peel Road, and Crawney Road. This has been removed to avoid impacts to residents on this route. The change does not affect the volumes of construction traffic presented in the EIS which were considered on a worst case of all using the Morrisons Gap Road route as the primary route option.In order to reduce traffic impacts in Nundle, the Project has now committed to a preferred route along Barry Road and Morrisons Gap Road. This reduces OSOM and construction related traffic through residential areas of Nundle.The following table shows the peak construction period traffic generated through Nundle to the Project Area between 7:00am and 8:00am. This peak period is expected to have a maximum duration of 13 months within the overall construction period. The forecasts should be considered against existing morning peak traffic volumes of 42 vehicles through Nundle with the majority flowing towards Tamworth. <p>Updated Morning and Evening Peak (7:00am – 8:00am) Traffic Generation Estimates</p> <table><tr><th rowspan="2">Vehicle Type</th><th>EIS Assessed Peak Morning and Evening to Site</th><th>Updated Peak Morning and Evening to Site</th><th rowspan="2">Reduction</th></tr><tr><th>(trips)</th><th>(trips)</th></tr><tr><td>Light vehicles</td><td>87</td><td>70</td><td>-20%</td></tr><tr><td>Buses</td><td>4</td><td>0</td><td>-100%</td></tr><tr><td>Water trucks</td><td>3</td><td>3</td><td>0%</td></tr><tr><td>Trucks</td><td>14</td><td>7</td><td>-50%</td></tr><tr><td>Total</td><td>108</td><td>80</td><td>-26%</td></tr></table> <ul style="list-style-type: none">The peak trips and daily trips have reduced from what was presented in the EIS due to more accurate forecasting with contractor input, including lower estimate of workers and the proposed car-pooling initiatives.The updated traffic volumes have resulted in a 26% reduction in proposed peak construction traffic through Nundle. These reduce to 55 trips to site with the implementation of a shuttle service which is subject to safety and further consultation.Intersection modelling was completed as part of the Traffic and Transport Addendum Report (Appendix H of the Amendment Report) for the following intersections:<ul style="list-style-type: none">Goonoo Goonoo Road (NEH) / Scott Road / Vera Street (Tamworth)Murray Street / Marius Street (Tamworth)New England Highway / Nundle Road (Tamworth)Lindsay Gap Road and Nundle Road (Nundle)Oakenville Street and Jenkins Street (Nundle)The modelling shows that each of the intersections modelled would perform acceptably with and without the construction traffic from the Hills of Gold Wind Farm and that construction traffic would have minimal impact on the road network operation in both the morning and evening peaks.OSOM vehicle movements through small rural towns associated with wind farm development has successfully occurred in other townships with effective mitigation and management in place to limit and manage impacts. This includes the construction of the White Rock Wind Farm Stage 1 (70 WTGs) and the Sapphire Wind Farm (75 WTGs), both of which involved OSOM and construction traffic accessing the projects through the rural township of Glen Innes.A detailed Traffic Management Plan (TMP) will be prepared prior to construction in consultation with Transport for NSW, TRC, and other relevant roads authorities associated with the Project, to the satisfaction of the Secretary of DPIE. The TMP will incorporate management and mitigation measures for construction of the Project, including but not limited to:	Vehicle Type	EIS Assessed Peak Morning and Evening to Site	Updated Peak Morning and Evening to Site	Reduction	(trips)	(trips)	Light vehicles	87	70	-20%	Buses	4	0	-100%	Water trucks	3	3	0%	Trucks	14	7	-50%	Total	108	80	-26%
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			<ul style="list-style-type: none">- minimise traffic safety impacts of the Project and disruptions to local road users during construction, including consideration of temporary traffic controls, noise considerations and speed limits;- community notification,- minimising conflict with school buses routes and times;- use and introduction of additional laybys to minimise disruption to local traffic;- traffic management system for managing OSOM vehicles;- Emergency Response Plan in consultation with the local emergency services;- implementation of carpooling for the construction workforce;- inclusion of a works traffic only car park situated outside Nundle;- Parking restrictions in Nundle and use of a dedicated works vehicle carpark to reduce congestion at local and tourist features and amenities;- a driver's code of conduct that addresses:<ul style="list-style-type: none">· travelling speed;· procedures to ensure drivers to and from the development implement safe driving practices and adhere to designated transport routes; and· In vehicle monitoring system (IVMS) to vehicles travelling to and from site.- operational traffic management; and- a detailed program to monitor and report on the effectiveness of these measures and the code of conduct.																																															
TRC_2	Traffic and Transport	<ul style="list-style-type: none">■ In terms of traffic impact, the projected additional vehicle movements will not push any of the roads or intersections to the point that reasonable levels of service are exceeded. In the case of roads in and around Nundle and Hanging Rock, this is essentially a function of the fact that current traffic volumes are relatively modest. The existing traffic volumes on these roads and intersections are simply a long way from their theoretical capacity. The corollary to this, of course, is that the additional traffic will be quite noticeable when set against the modest ambient levels. There will be a temporary impact on the existing character of these locations.	<ul style="list-style-type: none">■ The peak trips and daily trips have reduced from what was presented in the EIS due to more accurate forecasting with contractor input, including lower estimate of workers and the proposed car-pooling initiatives.■ Estimated reduction in daily peak construction traffic through Nundle and Hanging Rock are shown below. This should be considered against existing daily traffic volumes of 845 through Nundle including 72 one-way forestry truck movements. <p>Updated Traffic Generation Estimates</p> <table><tr><th></th><th>Units</th><th>EIS Assessed Peak Morning and Evening to Site (trips)</th><th>Updated Peak Morning and Evening to Site (trips)</th><th>Reduction</th><th>EIS Assessed Daily to Site (trips)</th><th>Updated Daily to Site (bi-directional) (trips)</th><th>Reduction</th></tr><tr><td>Light vehicles</td><td rowspan="2">174 workers</td><td>87</td><td>70</td><td>-20%</td><td>210</td><td>155</td><td>-26%</td></tr><tr><td>Buses</td><td>4</td><td>0</td><td>-100%</td><td>12</td><td>0</td><td>-100%</td></tr><tr><td>Water trucks</td><td>15 per day</td><td>3</td><td>3</td><td>0%</td><td>40</td><td>30</td><td>-25%</td></tr><tr><td>Trucks</td><td>63 per day</td><td>14</td><td>7</td><td>-50%</td><td>240</td><td>126</td><td>-48%</td></tr><tr><td>Total</td><td>-</td><td>108</td><td>80</td><td>-26%</td><td>502</td><td>311</td><td>-38%</td></tr></table> <ul style="list-style-type: none">■ The Code of Conduct within the Traffic Management Plan will include temporary parking restrictions for regular construction workers on streets within Nundle providing key services to tourists and local residents in order to preserve the current amenity. The location and nominal times of these parking restrictions will be determined in consultation with local businesses and TRC, which will take into account the services accessed by tourists and local community on Jenkins Street.■ Temporary signage will be considered subject to further consultation with TRC and local business owners indicating “No Wind Farm Construction Parking, Customers Only” during the relevant times. An August 2021 survey confirmed support for this initiative and provided feedback on business opening hours.■ The traffic analysis in Section 5 of the Traffic and Transport Addendum Report by TTPP (Annexure F) shows that the additional traffic generated by the Project would have minimal impact on the road network efficiency. In addition, the volumes forecast for the local streets would be less than the environmental capacities presented within the RTA Guide to Traffic Generating developments.		Units	EIS Assessed Peak Morning and Evening to Site (trips)	Updated Peak Morning and Evening to Site (trips)	Reduction	EIS Assessed Daily to Site (trips)	Updated Daily to Site (bi-directional) (trips)	Reduction	Light vehicles	174 workers	87	70	-20%	210	155	-26%	Buses	4	0	-100%	12	0	-100%	Water trucks	15 per day	3	3	0%	40	30	-25%	Trucks	63 per day	14	7	-50%	240	126	-48%	Total	-	108	80	-26%	502	311	-38%
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Reference No.	Theme	Submission	Response																																				
			<div><div><div><div></div><div>Notwithstanding the above, the construction period will increase traffic volumes in Nundle for the period of the construction. The analysis provided is for the peak of construction and not for the full construction period. It shows that the peak construction activity is likely to last for approximately 6 months with periods before and after this experiencing much lower Project traffic volumes. Feedback from businesses recognised the likely increase in customers during this time.</div></div><div><div></div><div>In addition, a proposed temporary dedicated construction car park in Nundle could facilitate the implementation of a shuttle bus service at peak times, which would reduce the traffic generated from Nundle to the Project Area. Further consultation with Project stakeholders as well as thorough risk assessments will be undertaken to assess the proposed shuttle bus service, and this will only be introduced if practicable. For information purposes, the table below shows the potential reduced peak construction period traffic generated from Nundle to the Project site if a shuttle bus service were implemented.</div></div></div><div>Peak Construction Period (with shuttle service to the Project Site from Nundle)</div><table><tr><th>Table Heading</th><th>Units</th><th>Morning to Site (trips)</th><th>Morning from site (trips)</th><th>Morning total (trips)</th><th>Daily (trips)</th></tr><tr><td>Light vehicles</td><td>104 workers</td><td>42</td><td>10</td><td>52</td><td>94</td></tr><tr><td>Buses</td><td>70 workers</td><td>3</td><td>3</td><td>0</td><td>6</td></tr><tr><td>Water trucks</td><td>15 per day</td><td>3</td><td>3</td><td>6</td><td>30</td></tr><tr><td>Trucks</td><td>63 per day</td><td>7</td><td>7</td><td>14</td><td>126</td></tr><tr><td>Total</td><td>-</td><td>55</td><td>23</td><td>72</td><td>256</td></tr></table><div><div><div></div><div>The updated daily traffic volumes during the peak construction period are estimated at between 256 and 313 depending on the implementation of shuttle services. This compares with existing daily traffic volumes of 845 through Nundle.</div></div><div><div></div><div>The updated traffic volumes have resulted in a 26% reduction in proposed peak construction traffic through Nundle without implementing the shuttle service from Nundle and a 49% reduction with the shuttle service. Overall reduction in 38% of daily trips to site has been assessed.</div></div><div><div></div><div>As stated above, intersection modelling was completed as part of the Traffic and Transport Addendum Report (Appendix H of the Amendment Report) for five intersections in the Tamworth LGA: Goonoo Goonoo Road (NEH) / Scott Road / Vera Street; Murray Street / Marius Street; New England Highway / Nundle Road; Lindsays Gap Road and Nundle Road (Nundle) and Oakenville Street and Jenkins Street (Nundle).</div></div><div><div></div><div>The modelling shows that each of the intersections modelled would perform acceptably with and without the construction traffic from the Hills of Gold Wind Farm and that construction traffic would have minimal impact on the road network operation in both the morning and evening peaks.</div></div></div></div>	Table Heading	Units	Morning to Site (trips)	Morning from site (trips)	Morning total (trips)	Daily (trips)	Light vehicles	104 workers	42	10	52	94	Buses	70 workers	3	3	0	6	Water trucks	15 per day	3	3	6	30	Trucks	63 per day	7	7	14	126	Total	-	55	23	72	256
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TRC_3	Traffic and Transport	<div><div><div></div><div>The nominated route for this routine traffic is into Nundle via Lindsays Gap Road or Nundle Road, and then to the site via Morrisons Gap Road. This appears to be at odds however with the proposed site configuration which includes establishment phase batching plants and laydown areas at both extremities of the project footprint (i.e. one at the end of Morrisons Gap Road, and another at the end of Kirks Road, off the Head of Peel Road). Clarity needs to be provided as to whether routine construction traffic is to be split between these two destinations.</div></div></div>	<div><div><div></div><div>The EIS included an additional access route via Head of Peel Road, whereby approximately 20% of vehicles were anticipated to access the Project Area (and the remainder 80% via Morrisons Gap Road access).</div></div><div><div></div><div>The Head of Peel Road access is no longer proposed and all associated ancillary infrastructure in this area (eg laydown area, batching plant compound) have been relocated to within the Project area. The Head of Peel Road will continue to provide emergency access only to the landholding, consistent with existing rights. As a consequence, related upgrades to the Head of Peel Road identified in the EIS are no longer proposed.</div></div><div><div></div><div>All OSOM traffic for the Project will access Nundle via Lindsays Gap Road and Nundle Road. From Nundle, all traffic (100%) will access the Project Area via Oakenville Street, Old Hanging Rock Road, Barry Road and Morrisons Gap Road. As a result of removing the Head of Peel Road, no dust suppression is proposed on this route.</div></div><div><div></div><div>The Project will manage the generation of dust along Project access routes. As noted, all roads along the proposed Project access routes are sealed, other than Morrisons Gap Road. An updated proposal in relation to dust management and road sealing is presented in response to TRC_5 below.</div></div></div>																																				
TRC_4	Traffic and Transport	<div><div><div></div><div>Another potential impact along access routes that routinely requires management is the generation of dust. The proponents have nominated that they will upgrade and seal Morrisons Gap Road. The other roads along the nominated route are already sealed. However, if Head of Peel Road is to carry a measurable amount of the projected routine construction traffic, consideration will need to be given to sealing part or all of that alignment.</div></div></div>																																					
TRC_5	Traffic and Transport	<div><div><div></div><div>There is potential for accelerated deterioration of roadways and associated infrastructure as a result of the construction phase traffic. This can be managed via a process of dilapidation surveys and agreed management plans, secured by way of performance bonds.</div></div></div>	<div><div><div></div><div>Following consultation with Council representatives, the Proponent issued an offer to TRC on 19 May 2021 providing that the Project will commit to undertaking, at its sole cost and expense, the following works:<div><div><div></div><div>a structural load assessment on each of the Goonoo Goonoo Bridge and Middlebrook Creek Bridge along Lindsays Gap Road and, if either bridge is found to be structurally inadequate for the transport of the expected equipment loads for the Project, upgrade the bridge(s) to the extent reasonably required to ensure it is structurally adequate and suitable for the Project loads and consult with the TRC to incorporate any reasonable Council requirements in respect of such upgrade;</div></div><div><div></div><div>the use of polymers and water dust control on Morrisons Gap Road during construction and subsequent upgrade to a sealed road from the corner of Barry Road to the entrance to the Project site entrance along</div></div></div></div></div></div>																																				

Reference No.	Theme	Submission	Response
			<p>Morrison's Gap Road (total distance is approximately 3.0km) following construction. This includes safety upgrades to the same stretch of Morrison's Gap Road by installing hazard signage, widening the road where required and lane marking on corners and crests;</p> <ul style="list-style-type: none"> – reduce impacts to existing road users and businesses in Nundle by installing temporary lay-bys on the Lindsay Gap Road and Morrison's Gap Road and a parking restriction for project related traffic in Nundle and a proposed temporary carpark in Nundle; – increase safety for residents along the updated proposed route by installing a pedestrian crossing near the corner of Jenkins St and Oakenville St in Nundle subject to consultation with Council; and – either: <ul style="list-style-type: none"> i. commission a dilapidation report in respect of those Council roads which will be used by Project traffic both prior to the commencement of, and following the completion of, construction of the Project and agree to either fund or undertake any works reasonably required to rectify any material dilapidation caused by construction traffic associated with the Project. The Proponent (or its contractor) will provide a performance bond in favour of the Council in the form of a letter of credit or bank guarantee to secure its performance of its use of the roads in the updated OSOM Route through TRC (See Annexure B). An amount equal to \$4,000 per km of roads within the TRC area which are used by OSOM traffic associated with the Project during construction of the Project, with such bond to be provided following receipt of the Development Approval and prior to the commencement of any works referred to in (a) to (d) above. It is currently estimated that the Project will use up to 48 kilometres of roads within the TRC area, but this will be quantified at the approvals stage under Section 138 of the Roads Act 1993 (NSW) in respect of the Project; or ii. a road usage fee equal to \$300,000 during construction based on the Project expected use of roads length as described above.
TRC_6	Traffic and Transport (OSOM Vehicles)	<ul style="list-style-type: none"> ■ From an engineering perspective, there are some significant gaps in the current analysis of OSOM traffic routes. The assessment appears to be based on plan-view geometry and therefore understates the extent of impacted areas where there are cuttings and batters. The assessment is also confined to identifying the geometric extent of the impact – but does not explore the mechanisms for achieving the extra clearing, infrastructure relocations, land acquisitions and the like. The intrusions into adjoining landholdings will also need to be resolved with the relevant owners, and an accurate geometric extent will need to be defined in order to facilitate these negotiations. 	<ul style="list-style-type: none"> ■ Engineering design of the Project Area and the Devil's Elbow bypass road as presented in the EIS was completed by Turnbull Engineering and undertaken in 12D (a 3D civil engineering software) to show the expected worst-case development impact of earthworks and associated drainage. As part of consultation with TRC, the original engineering files were provided for assessment. ■ Devil's Elbow bypass road has been modified and further design undertaken. Refer to TRC_8 for a response. The updated engineering design for the Devil's Elbow bypass road is provided in Appendix P of the Amendment Report. ■ Physical surveys of the intersection of Barry Road and Morrison's Gap Road and along Morrison's Gap Road have been completed to determine the exact location of the road reserve and geometry of the existing road. The physical surveys were undertaken by a licensed surveyor. Civil design has been updated to provide road geometry including road shoulders, drainage, proposed retaining walls and the location of existing vegetation in relation to private property boundaries. The updated civil designs confirms that all construction and earthworks can be maintained within the road corridor. The updated design with cadastre and vegetation survey are presented in Appendix P of the Amendment Report. ■ The Project has also offered vegetation screening from the road for any resident's dwelling that is impacted by removal of vegetation within the public road corridor on Morrison's Gap Road. ■ Additional surveys to collect vegetation condition plot data were carried out in March 2021 by four botanists over 100 person hours with collection of 24 additional plots including within the sections of 'Devil's Elbow' and along Morrison's Gap Road. ■ Impacts assessed remain as a worst case to allow for construction impacts. Project changes and refinements have resulted in a significant development footprint reduction for the transport route upgrades from 56 ha (EIS) down to 9 ha. ■ The updated RJA Transport assessment has optimised swept path to reduce the number of affected private landowners along the route. This has resulted in a reduction of 14 properties affected. ■ The Project has consulted all landowners along the transport route and, upon final equipment selection and design, will seek licenses or easements as required for either hardstand works or temporary blade overhang. No landowners required along the updated proposed transport route objected to the project during public exhibition or since. ■ The transport route has been subject to further assessment. The changes are detailed in the updated Route Assessment by RJA, attached as Annexure I of the Amendment Report. This report shows updated images of swept path along Barry Road and Morrison's Gap Road, with revised commentary on required movement of street furniture, vegetation trimming, earthworks and road widening where required. ■ Based on the updated Route Assessment by RJA, road works within the Tamworth LGA required to facilitate OSOM vehicles to the Project Area are now limited to:

Reference No.	Theme	Submission	Response
			<ul style="list-style-type: none"> the intersection of Lindsay's Gap Road and Nundle Road. RJA undertook a transport route analysis which included a swept path analysis of the intersection, identifying additional hardstand, removable signage and relocation of a power-pole; the intersection of Oakenville Street and Jenkins St where two signs will need to be removable; the intersection of Oakenville Street and Old Hanging Rock Road where the swept path analysis of this intersection identifies the need for road widening, additional hardstand and removable signage on the bridge and sections of the guardrail; Barry Road: layover involving widening of the road shoulder to provide a staging area of trucks about to negotiate the gradient up to Hanging Rock, cutting back of vegetation within the existing road reserve and earthworks to cut back embankment in one section; Devil's Elbow bypass road (discussed further herein); Barry Road / Morrisons Gap Road intersection. additional widening and hardstand, fence relocation and removal of vegetation; and Morrisons Gap Road: widening to 5.5m, additional layby, clearing vegetation and ultimately the sealing of Morrisons Gap Road. <ul style="list-style-type: none"> Further, Goonoo Goonoo Creek Bridge would require widening and upgrading for OSOM loads with axles exceeding 3.5 m. Middlebrook Creek Bridge may require upgrading for OSOM with a trafficable deck width of at least 4.6 m. These road works have been assessed in both the updated Traffic and Transport Addendum Report by TTPP (Annexure H) and the updated Route Assessment by Rex J Andrews (Annexure I), appended to the Amendment Report.
TRC_7	Traffic and Transport (Devil's Elbows)	<ul style="list-style-type: none"> The two nominated alternative routes both include significant impediments that remain unresolved: In the case of the Barry Road route, the strategy for negotiating the Devil's Elbow was previously stated as involving lifting the blades into a vertical position. This no longer appears to be the case. Instead, the stated strategy involves constructing a track straight up from the first hairpin, tying back into Barry Road some 460m further uphill. The practicality of this suggestion is questionable. The engineering associated with stabilising and draining such an extreme formation would be challenging to say the least, and the result would be highly visible (creating a visible vertical scar) as well as being precarious. In the case of the Head of Peel Road route, the existing unsealed road formation wanders in and out of the actual gazetted road boundaries from place to place. The geometry of both the existing formation and the gazetted reserve are such that transporting the blades would involve intrusions into private land holdings, whichever alignment were to be adopted. Council is of the understanding that not all landowners along this route are supportive of the project. In fact, quite the opposite. Securing the necessary third-party agreements associated with transporting the blades along this route would appear to be far from a foregone conclusion. 	<ul style="list-style-type: none"> Access via Head of Peel Road is no longer proposed, as detailed above in response to TRC_3. An independent analysis of possible Project delivery routes by Siemens-Gamesa (a global leading wind turbine supplier with the largest blade proposed for this Project) originally identified Barry Road including the Devil's Elbow bypass road as the optimal delivery route for the Project. Analysis considered many factors including: viability of the public road network, extent of earthworks, biodiversity impacts, heritage impacts, geometry of the road upgrade, and impact to residents along the route. Further concept design work was completed for Devil's Elbow bypass by experienced design and construct contractor (Wallbridge Gilbert Aztec (WGA) who have designed over 15 wind farms in Australia) which presents updated alignment, 3D designs including drainage, tie-in with walking trails, and safety considerations. This is presented in Appendix P of the Amendment Report. Updated design avoids direct impacts to Black Snack Mine entrance and design and construction commitments to avoid underground mines. An updated landscape and visual impact assessment of the proposed Devil's Elbow bypass confirms in the context of the surrounding land use, the visual impact is very low and existing vegetation will screen the bypass road within close proximity. A 3D Visualisation Model has been prepared by AECOM and images capturing this are presented in more detail in Appendix P of the Amendment Report. This model has been presented to Tamworth Regional Council during the consultation noted in Chapter 4. Further investigation has been undertaken into lifting blades into a vertical position. While this transportation methodology has successfully been implemented on projects overseas, it is yet to be undertaken in Australia. The Project will continue to work with contractors and logistics providers to implement transportation solutions that minimise the impact of the Project. However, given the uncertain feasibility of tilting blades during transport, the standard method of blade transport in Australia is proposed to be retained for the Project and has been assessed.
TRC_8	Hazards and Risks	<ul style="list-style-type: none"> The DA documentation is silent on the matter of RAV requirements during the operational phase. That is to say, there is no mention of contingency for the event of a blade-throw or other catastrophic failure, and the subsequent need to transport substantial overlength or over mass replacement components. This aspect needs to be clarified, as it has an impact on the timing of reinstatement of "temporary" establishment-phase access alignments. 	<ul style="list-style-type: none"> During operations, there will be a Project need to potentially replace blades and other components that require OSOM vehicle movements. In these instances, the Project will utilise the transport route used during construction. Suitable land tenure arrangements will be put in place along the transport route for the lifetime of the project. The temporary road modifications required for construction will be reinstated in consultation with the landholders and Council. It is noted that some ad hoc operational OSOM movements may not require hardstand reinstatement in these temporary areas if the locations are accessible due to dry weather or with the assistance of temporary bog mats. Operational phase transport requirements will be addressed in the Traffic Management Plan that will be prepared in consultation with Transport for NSW, TRC, and other relevant roads authorities associated with the Project.
TRC_9	Traffic and Transport	<ul style="list-style-type: none"> Additional clarity is required in the regard to RAV access during Decommissioning Phase. 	<ul style="list-style-type: none"> The Project will commit to the preparation of a full Decommissioning Plan in accordance with the requirements of any planning consent. The Project has committed to prepare and implement a Decommissioning Plan 18 months prior to the expected end of the Project's life.

Reference No.	Theme	Submission	Response
			<ul style="list-style-type: none"> During decommissioning, the removal of infrastructure from the Project Area will require OSOM vehicle movements. The volumes will be less than that during construction as some components are expected to be broken down prior to transport off site (for example, the blades will likely be cut into smaller pieces). Suitable land tenure arrangements will be put in place along the transport route for the lifetime of the development. The Project will utilise the transport route used during construction for the decommissioning phase. However, it is noted that transport technology is expected to have advanced by this stage and the availability and condition of road networks may have changed, potentially requiring less modification to the existing transport routes than were needed for the construction phase. This will be addressed in the Decommissioning Plan, which will incorporate traffic management requirements similar to the above.
TRC_10	Project components (Ancillary infrastructure)	<ul style="list-style-type: none"> More details are necessary to determine the construction impacts associated with the ancillary industrial components within the development site to ensure the potential environmental impacts (e.g. noise, dust, odour, traffic, contamination, flora and fauna) are minimised and managed appropriately. It is Council's opinion that the sensitivity of the site is such that the specific details of these expansive elements needs to be investigated in detail prior to approval of the development. 	<ul style="list-style-type: none"> The EIS and associated specialist technical reports assessed all relevant environmental impacts associated with the Project during construction, operation and decommissioning. This included technical assessment of noise, air quality, traffic, soil and water and construction related biodiversity impacts for the WTGs, construction of roads and road upgrades, laydown areas, batching plants, substation, Battery Energy Storage System (BESS), switching station and Operations and Maintenance facility. The conditions of any determination will limit impact to that assessed. Based on feedback from the community and regulators (including TRC) during the exhibition of the EIS, additional assessments have been completed to address comments raised, and to assess amendments to the Project layout and design elements. The further assessment includes an updated BDAR (including bird and bat), Traffic and Transport Addendum Report, updated Transport Route Assessment, further visual impact assessment including additional fieldwork and dwelling assessments, further hazard considerations primarily associated with the BESS, additional noise modelling, geotechnical assessment and a Soils and Water Addendum Report, which includes additional details on slope, soil stability and catchment impacts based on site-specific investigations. These are provided as technical reports attached to the Amendment Report. Input from construction contractors (including CATCON who have built 14 wind farms in Australia, AECOM and ENGIE project delivery team and Biosis) the development footprint has reduced from 513ha to 300ha.
TRC_11a	Environmental Impact	<ul style="list-style-type: none"> Council requires more information of a significant detail to assure it of the ability of the development to preserve the environment and minimise the development impact. Providing this level of integrity will involve the Proponent demonstrating that the development can and will satisfy the following: <ol style="list-style-type: none"> Limiting disturbance, i.e. the development footprint to areas than can be reasonably managed in terms of batter slopes and extents; 	<ul style="list-style-type: none"> Geotechnical investigations have been undertaken to inform site slope and soil stability characteristics. The updated onsite geotechnical investigations are a site-specific ground truthing of the original Soils and Water Assessment (Appendix O of the EIS). This assessment more accurately addresses the site conditions for suitability of construction methods, required considerations for soil erosion and sediment controls and will provide a basis for future detailed design for the Project. The outcomes of the geotechnical investigations are considered in the Soil and Water Addendum Report (Appendix N of the Amendment Report). The Environmental Management Strategy for the Project will include an Erosion and Sediment Control Plan and Soil and Water Management Plan to mitigate and manage soils and water impacts during construction and operation. The Development Footprint has been optimised to minimise bulk earthworks and associated disturbance to soils and biodiversity demonstrated by the reduction in development footprint. By locating the Development Footprint along the ridgetop the Project has primarily avoided steep upper slopes to the ridgeline. Many other constructed NSW wind farms incorporate some similar narrow ridgelines in their development. Removal of the Head of Peel Road as a transport route option avoids significant road construction up complex steep terrain. Water quality management will be achieved using specific erosion and sediment controls based on The Blue Book (Landcom, 2004) and developed by an experienced Certified Practitioner in Erosions and Sediment Control (CPESC) to further reduce the risk of runoff. This will address any requirements for the management of pollutants or contaminated lands during construction so as to minimise impacts to terrestrial and aquatic habitats. The Soil and Water Addendum Report (Appendix N of the Amendment Report) provides updated design and construction methodology commitments which are expected to be recommended as part of the CPESC Soil and Water Management Plan.
TRC_11b		<ol style="list-style-type: none"> Avoiding large cut and fill on steep areas of the site; 	
TRC_11c		<ol style="list-style-type: none"> Avoiding clearing anywhere near established creek lines, and where existing vegetation is essential to maintaining slope stability during rainfall events; 	
TRC_11d		<ol style="list-style-type: none"> Capturing and appropriately detaining runoff from disturbed areas, prior to discharge to established water courses; 	
TRC_11e		<ol style="list-style-type: none"> Similarly capturing and appropriately detaining runoff from roofed structures, and storing for re-use or discharge to established water courses; 	
TRC_11f		<ol style="list-style-type: none"> Adequately designing and managing crossings of lower order water courses, and avoiding crossing higher order water courses wherever possible; 	
TRC_11g		<ol style="list-style-type: none"> Managing the interfaces between internal access tracks and public roadways, and; 	
TRC_11h		<ol style="list-style-type: none"> Stabilising and re-establishing disturbed areas and management in accordance with the Blue Book guidelines in a timely manner. 	
TRC_12	Biodiversity	<ul style="list-style-type: none"> Lack of information in relation to impact on fauna (particularly aerial fauna) located in the adjoining Ben's Hall Gap Nature Reserve (2,500 Ha) and Cranney National Park (310 Ha). It is strongly recommended that the indirect impacts from the wind turbines be examined within a 10km buffer from the development footprint. 	<ul style="list-style-type: none"> The 1,500 m landscape buffer was assessed in the context of connectivity around the Project Area. Following consultation with the DPIE Biodiversity, Conservation and Science Directorate and National Parks and Wildlife Service on 12 June 2020 based on the draft BDAR, it was agreed that a number of rapid Plant Community Type (PCT) verification and habitat assessment points would be carried out within the Ben Halls Gap Nature Reserve, where it is adjacent to the Development Footprint to improve on previous survey efforts. The field survey methodology for target fauna species that could be subject to indirect impacts as a result of the wind farm operation, specifically birds and bats, is sufficient to detect any animals that may move through the site and utilise BHGMR. The Proponent has removed 3 turbines assessed as having the potential for high impact to native bat species. This includes the removal of WP 31, adjacent to Ben Halls Gap National Park, and WP 23 and WP27 all benefiting connectivity impacts to the Ben Halls Gap National Park.

Reference No.	Theme	Submission	Response
			<ul style="list-style-type: none"> ■ The closest turbine to the Crawney National Park, WP 1 has also been removed due to impacts associated with biodiversity, also improving potential connectivity impacts across high condition native vegetation. ■ The Proponent has updated its commitments in Table 72 “Proposed Mitigation Measures” in Section 8.9 of the Updated BDAR for inclusion in the Biodiversity Management Plan. The following summarises the measures for risk management to residual impacts to neighbouring National Parks and impacts to habitat connectivity: ■ Implementing vegetated buffers between the access tracks and wind turbine pads and the National Park estate is to be considered during detailed design. The selection of areas of buffer plantings and species to be planted will be carried out in consultation with the Area Manager, Barrington Tops National Parks and Wildlife Service. ■ Restore and rehabilitate all areas within the temporary development footprint. Priority should be given to movement corridors for fauna, significant habitats and threatened ecological communities. ■ Explore opportunities to further minimise the disturbance footprint and clearing within important movement corridors for fauna in detailed design. ■ Explore opportunities for post-works restoration of habitat connectivity within important movement corridors for fauna. ■ Areas subject to temporary disturbance will be rehabilitated using a native species planting schedule as much as practical considering any operational and safety constraints. ■ The total area exposed and cleared at any one time will be minimised and planned to allow for fauna movement during construction and periods of temporary disturbance. ■ The Erosion and Sediment Control Plan will include specific actions to identify sensitive receptors associated with the National Park estate, including waterways and the adjacent Sphagnum Moss TEC.
TRC_13	Biodiversity (Collision Risk)	<ul style="list-style-type: none"> ■ Lack of information in relation to Collision Risk for Bats and Birds. Appendix D of the Report contains data and modelling in relation to the collision risk for birds but does not include any modelling in relation to bats or nocturnal bird species such as owls. The report states that of the fifty-one (51) species of birds present in the development footprint, all of these have the capacity to fly at the same height as the turbine blades but only eighteen (18) bird species were recorded as doing so. The report goes on to state the risk of collision is estimated as being very low. The report includes little evidence to support this conclusion. ■ Section 8.3 of the Report does address the potential impact of the wind turbines on threatened bat species within the development footprint and basically concludes that there is limited data on the heights that the bats will fly and forage. It states that the spacing between the turbines (ranging from 300m to 500m) will allow substantial locations for migrating and foraging bats to pass through the landscape. The report provides insufficient data / modelling to support this conclusion. 	<ul style="list-style-type: none"> ■ Consultation was carried out with the BCD of DPIE and NPWS on this amended BDAR on the 3 February 2021 and 27 May 2021 in response to their submissions, which included comments on the adequacy of existing Collision Risk Assessment and surveys, similar to this TRC concern. As a result of this consultation additional targeted field surveys, desktop assessment and detailed analysis was completed as part of updating and amending the Collision Risk for Bats and Birds including: <ul style="list-style-type: none"> – Additional geomorphological assessment was carried out to assess the potential for microbat roosts and breeding habitat. Figure 14 in the Updated BDAR has been provided to present the revised bat habitat. – A microbat cave roost inspection was carried out between 29 March 2021 and 1 April 2021. All high priority areas that were identified via desktop as having a sudden change in elevation (ie potential large caves, and clifflines) were able to be visually inspected from the nearest accessible point. The new Appendix F “Geomorphology, ecology and potential microbat roosting habitat (Environmental Geosurveys)” in the Updated BDAR presents the assessment carried out. – Large forest owl habitat suitability mapping and assessment was carried out. Figure 20 “Forest Owls Species habitat polygons” in the Updated BDAR provides the map of potential owl habitat. Survey efforts did not identify any large forest owls however it was still assumed that certain identified areas had the potential to host large forest owls and so their presence is assumed in the updated Assessment for the purposes of determining appropriate mitigation measures. – Serious and irreversible impact (SAII) assessments were updated for microbat species. However, subsequent design refinements have resulted in the SAII assessment for microbats no longer being required. Appendix E of the Updated BDAR provides details associated with assessments undertaken in accordance with serious and irreversible impact assessment, providing an update to the assessment of impacts to cave roosting bats. – An assessment of prescribed impacts in accordance with the BAM was undertaken, as well as further detailed assessment of indirect impacts (including operational impacts from blade strike) to threatened species was updated and is available in Section 8.5 “Prescribed Impacts” of the updated BDAR. – A qualitative risk assessment was completed for impacts associated with bird and bat turbine strike, as well as a turbine specific risk assessment. Section 8.3 has been updated provide a more detailed assessment of the risk of bat species and each turbine. Three turbines previously considered high risk of impact has been removed from the project layout. The only remaining high risk of impact turbine has been micrositeing 130m and is outside of the habitat buffer. ■ Additional operational mitigation measures been provided to manage residual potential impacts from turbines and are referred to below in TRC_14. ■ Connectivity for fauna is addressed above in TRC_12. ■ Significant refinement has been achieved for previously assumed potential roosting / breeding habitat locations for cave dwelling bats including the threatened Eastern Cave Bat, Large Bent-winged Bat, Little Bent-winged Bat and Large-eared Pied Bat within and surrounding the Development Footprint. The former conclusion of a potential significant impact to Large-eared Pied Bat has been updated to unlikely, coupled with turbine removal and relocation. Further information is provided in Section 8.8 of the updated BDAR.

Reference No.	Theme	Submission	Response
TRC_14	Biodiversity (Bird and Bat Adaptive Management Plan)	<ul style="list-style-type: none"> Like the Biodiversity Offset Strategy, the BDAR states that a Bird and Bat Adaptive Management Plan will not be developed until after the wind farm is approved. It is strongly recommended that a Bird and Bat Adaptive Management Strategy be submitted prior to final determination of the project. 	<ul style="list-style-type: none"> A Bird and Bat Adaptive Management Plan is commonly made a condition of consent and required to be prepared in consultation with BCD and submitted to the Secretary of DPIE for approval prior to the commencement of operations. The Proponent consulted BCD on the 27th of May 2021 with proposed monitoring and adaptive operational strategies proposed to be committed to in the BBAMP section of the Updated BDAR. BCD provided feedback to ensure the adaptive commitments could be feasibly implemented. These strategies have been confirmed feasible to implement with Wind Turbine OEMs and with the project Proponent. The Updated BDAR now includes Section 9.9.1 providing “Operational turbine specific mitigations” for all turbines. These include: <ul style="list-style-type: none"> Development of a BBAMP in consultation with BCD to be implemented throughout life of project. Intensive monitoring period for the first six months of operation to be outlined in the BBAMP, followed by regular bird and bat monitoring/mortality surveys for the life of the wind farm at frequencies based on the findings of each survey period and adaptive management strategy detailed in the BBAMP. Investigation into the need for, and effectiveness of, appropriate low wind speed operational curtailment strategies (further detailed below), that may include measures such as prevention of blade rotation prior to electricity generation cut-in speeds, and/or increased night-time cut-in speeds. Research into the bat and bird deterrent systems and associated reduction of impacts, to establish whether implementation at the Project would be effective and practicable with the goal of integrating into BBAMP for re-evaluating turbine risk levels if proven effective. Regular ongoing maintenance of rotor blades to improve ultrasonic bounce-back enabling microbat avoidance. Installation of lighting schemes that minimise insect attraction to turbines within rotor swept height. Commitment to provision of data from ongoing bird and bat monitoring surveys and effectiveness of BBAMP to specialist research entities who are prepared to enter into appropriate agreements with the Project. The Proponent has revised the layout to remove 3 turbines which were considered to present a high risk to microbats, WP 23, WP27 and WP 31. WP 50 has been relocated out of any assessed direct impact. Additional mitigations measures for WP 50 are summarised below: <ul style="list-style-type: none"> Disturbance to roosting microbats as a result of ground vibration during breeding season (November to February) or winter torpor season (May to September) will be avoided and minimised as far as practicable. Monitoring of the presence of microbats within the habitat feature(s) near WP 50 will be undertaken prior to vibration-causing construction activities where required works coincide with breeding/torpor periods. If microbats are confirmed present prior to construction works commencing (during breeding/torpor periods), monitoring will continue during and post-construction, and suitable impact mitigation measures will be investigated such as: <ul style="list-style-type: none"> investigation into a suitable maximum vibration level to prevent disturbance to roosting microbats assessment of what activities or plant may cause this maximum vibration level to be triggered; and at what distance (setbacks) unacceptable levels of vibration may be experience at the habitat location. Additional low wind speed seasonal curtailment strategy with increased night-time cut-in speeds will be implemented. Strategy will be determined through measures such as analysis/comparison of microbat activity data with wind data collected during the EIS, or through undertaking a controlled experiment using (for example) a Before-After-Control-Impact (BACI) design, and implemented as part of the BBAMP. Increased frequencies of bird and bat monitoring/mortality surveys for at least months 7-30 of operation. Following which, the results will determine the frequency with which surveys will be ongoing and detailed in the BBAMP. Chapter 8.10.2 Bird and Bat Adaptive Management Plan has been included to provide greater clarity to the contents of the BBAMP. All requirements of the BBAMP would be developed in further consultation with BCD and DPIE.
TRC_15		<ul style="list-style-type: none"> It is also recommended that the layout and spacing of the turbines be revised to avoid any further clearing within the development footprint. 	<ul style="list-style-type: none"> The Proponent has engaged experienced wind farm construction contractors and a transmission line designer to undertake a review of the layout to provide advice on reducing the development footprint including impact along the proposed transmission line. Biosis undertook an assessment with the Proponent to advise on areas generating the highest impact. This resulted in project layout amendments and associated revised biodiversity impacts summarised below.

Reference No.	Theme	Submission	Response																												
			Total Development Footprint changes in the updated BDAR																												
			<table><tr><th>Project Component</th><th>BDAR Nov 2020 (ha)</th><th>Updated BDAR Sept 2021 (ha)</th><th>Change (ha)</th></tr><tr><td>Wind Farm (WF) including:<ul style="list-style-type: none">■ WTGs including crane pad assembly areas and asset protection zones.■ Internal access roads.■ Operations and maintenance building.■ Substation.■ BESS.■ Temporary facilities (Parking, storage, laydown areas and batching plants).■ Wind monitoring masts.</td><td>261</td><td>206</td><td>-55</td></tr><tr><td>Transmission Line (TL) including:<ul style="list-style-type: none">■ Transmission line.■ Switching station.■ Transmission line access roads.</td><td>196</td><td>85</td><td>-111</td></tr><tr><td>Transport route (TR) including:<ul style="list-style-type: none">■ Transport route upgrades.</td><td>56</td><td>9</td><td>-47</td></tr><tr><td>Total WF + TL + TR</td><td>513</td><td>300</td><td>-213</td></tr></table>	Project Component	BDAR Nov 2020 (ha)	Updated BDAR Sept 2021 (ha)	Change (ha)	Wind Farm (WF) including: <ul style="list-style-type: none">■ WTGs including crane pad assembly areas and asset protection zones.■ Internal access roads.■ Operations and maintenance building.■ Substation.■ BESS.■ Temporary facilities (Parking, storage, laydown areas and batching plants).■ Wind monitoring masts.	261	206	-55	Transmission Line (TL) including: <ul style="list-style-type: none">■ Transmission line.■ Switching station.■ Transmission line access roads.	196	85	-111	Transport route (TR) including: <ul style="list-style-type: none">■ Transport route upgrades.	56	9	-47	Total WF + TL + TR	513	300	-213								
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			<table><tr><th>Relevant Matter</th><th>Details</th><th>2020 BDAR Direct impacts</th><th>2021 Updated BDAR Direct impacts</th><th>Change in direct impacts</th></tr><tr><td>Native vegetation communities and ecosystem credit species habitats.</td><td>Direct loss of native vegetation communities associated with site clearing</td><td>207.7 ha</td><td>132.43 ha</td><td>-75.27 ha</td></tr><tr><td rowspan="2">Threatened ecological communities</td><td>Direct loss of Ribbon Gum—Mountain Gum—Snow Gum Grassy Forest/Woodland of the New England Tableland Bioregion</td><td>57.43 ha</td><td>23.36 ha</td><td>-34.07 ha</td></tr><tr><td>Direct loss of White Box Yellow Box Blakely’s Red Gum Woodland and derived native grassland</td><td>13.33 ha</td><td>6.07 ha</td><td>-7.26 ha</td></tr><tr><td rowspan="2">Habitat for threatened fauna species – species credit species</td><td>Large-eared Pied Bat*</td><td>61.08 ha</td><td>19.68 ha foraging habitat 0 ha breeding habit</td><td>-41.4 ha</td></tr><tr><td>Eastern Cave Bat*</td><td>62.49 ha</td><td>19.68 ha foraging habitat 0 ha breeding habitat</td><td>-42.81 ha</td></tr></table>	Relevant Matter	Details	2020 BDAR Direct impacts	2021 Updated BDAR Direct impacts	Change in direct impacts	Native vegetation communities and ecosystem credit species habitats.	Direct loss of native vegetation communities associated with site clearing	207.7 ha	132.43 ha	-75.27 ha	Threatened ecological communities	Direct loss of Ribbon Gum—Mountain Gum—Snow Gum Grassy Forest/Woodland of the New England Tableland Bioregion	57.43 ha	23.36 ha	-34.07 ha	Direct loss of White Box Yellow Box Blakely’s Red Gum Woodland and derived native grassland	13.33 ha	6.07 ha	-7.26 ha	Habitat for threatened fauna species – species credit species	Large-eared Pied Bat*	61.08 ha	19.68 ha foraging habitat 0 ha breeding habit	-41.4 ha	Eastern Cave Bat*	62.49 ha	19.68 ha foraging habitat 0 ha breeding habitat	-42.81 ha
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Reference No.	Theme	Submission	Response				
				Large Bent-winged Bat*	23.12 ha	0 ha (breeding habitat)	-23.12 ha
				Little Bent-winged Bat*	23.12 ha	0 ha (breeding habitat)	-23.12 ha
				Southern Myotis	2.21 ha	3.97 ha	1.76 ha
				Eastern Pygmy-possum	30.42 ha	18.14 ha	-12.28 ha
				Koala	50.76 ha	36.44 ha	-14.32 ha
				Squirrel Glider	26.20 ha	16.06 ha	-10.14 ha
				Booroolong Frog	1.59 ha	0.64 ha	-0.95 ha
				Border Thick-tailed Gecko	0.17 ha	0.17 ha	0 ha
				Powerful Owl, Sooty Owl, Barking Owl, Masked Owl	Not assessed as not located during surveys	1.99 ha based on assumed presence	No change. However, based the conservative assumption that these species are present despite not being located during surveys, 1.99 ha of potential habitat will be impacted.
				Total Change			-275.88 ha
			<ul style="list-style-type: none">■ As a result of targeted field survey, significant refinement have been achieved for previously assumed potential roosting / breeding habitat locations for cave dwelling bats including the threatened Eastern Cave Bat, Large Bent-winged Bat, Little Bent-winged Bat and Large-eared Pied Bat within and surrounding the Development Footprint. Based on this further assessment, including of the changes made to the Project, it has been concluded that the Project is unlikely to have a significant impact to Large-eared Pied Bat. Further information is provided in Section 8.8 of the Updated BDAR.■ During flora and fauna surveys carried out between 2018 and 2020 and over 1014 infrared motion detected camera trap nights, two adult Koalas (and one joey) were spotted in the Project Area. Seven (7) Koalas are recorded within 10 km of the Project Area.■ Despite significant loss of habitat during 2019/20 fires there remains extensive suitable high condition habitat in neighbouring properties and over 3,000 ha in neighbouring nature reserves suitable for Koala relocation if found prior to construction. The Proponent has further committed to best practise processes for minimising the unavoidable residual direct impacts noted above including:<ul style="list-style-type: none">– Pre-clearing protocols, including pre-clearing inspections, establishment of exclusion zones and on-ground identification of specific habitat features to be retained and/ or relocated.– Vegetation clearing protocols will be followed including staged habitat removal, fauna handling and unexpected threatened species finds procedures for species (including of wombats, Koala, and other fauna) and any specified seasonal limits on clearing activities.■ A Biodiversity Management Plan is to include the following specific requirements to minimise and manage any risk of fauna injury mortality during construction:<ul style="list-style-type: none">– Strategies for fauna management during construction including any identification roles, responsibilities and contingency measures such as temporary stop works and engagement of fauna specialist.– Requirements for temporary fencing to minimise the risk of fauna injury / mortality due to vehicle strike or entrapment in deep excavations.				

Reference No.	Theme	Submission	Response
			<ul style="list-style-type: none"> Opportunities for the salvage and re-use of important habitat features, including tree-hollows and bush rock, are to be identified and detailed procedures for the implementation of these activities are to be adopted. A Bird and Bat Adaptive Management Plan is to be developed and implemented for the monitoring of threatened or at risk species subject to adverse operational impacts. Operational turbine specific mitigation measures have been included in Section 8.9.1 of the Updated BDAR. Any unavoidable impact will be offset in accordance with the Biodiversity Conservation Act and as explained in the Amendment Report and the Updated BDAR.
TRC_16	Biodiversity (Land Clearing)	<ul style="list-style-type: none"> There appears to be an inconsistent approach to the level of assessment and approval processes for land clearing within the development footprint. Any clearing of habitat for threatened species or woodland listed as an endangered ecological community should address the potential impact on biodiversity irrespective of the end use. It is strongly recommended that no further clearing be permitted in the development footprint until such time as the Wind Farm application has been determined. 	<ul style="list-style-type: none"> No clearing has been undertaken by the Proponent on the Project Area and no clearing will be undertaken by the Proponent in the future until all relevant approvals have been obtained. The Proponent is aware of past and ongoing investigations into the unauthorised land clearing within the Project Area which have confirmed that the Proponent has not been involved in any unauthorised land clearing Pre-clearing surveys will be carried out to confirm the presence/absence of threatened flora within lands within the final optimised construction footprint. The results of the survey are to provide the updated baseline mapping of the vegetation communities and key fauna habitat on site for inclusion in the Biodiversity Management Plan and inform specific measures for the protection and management of threatened flora. This is to include at a minimum, specific requirements for the clearing process, any proposed translocation opportunities (for native fauna such as wombats) and associated contingency measures.
TRC_17	Biodiversity	<ul style="list-style-type: none"> Council officers have noted during site inspections, the presence of wombat holes across the development site. In this respect Council requires further expert information outlining the assessment of the impact of construction on these mammals and details of the proposed management, protection and preservation of these mammals during the construction phase of the project. 	<ul style="list-style-type: none"> The Proponent will implement best practice processes for minimising direct impacts to Wombats, Koala and other native fauna species by implementing vegetation clearing protocols including staged habitat removal, fauna handling and unexpected threatened species finds procedures for species and any specified seasonal limits on clearing activities. Table 72 "Proposed Mitigation Measures" in Section 8.9 of the Updated BDAR has been updated to list additional proposed mitigation measures for inclusion in the Biodiversity Management Plan. The following summarises the measures for risk management to Fauna injury/mortality during construction: <ul style="list-style-type: none"> Strategies for fauna management during construction including any identification roles, responsibilities and contingency measures such as temporary stop works and engagement of fauna specialist. Requirements for temporary fencing to minimise the risk of fauna injury / mortality due to vehicle strike or entrapment in deep excavations. Pre-clearing protocols, including pre-clearing inspections, establishment of exclusion zones and on-ground identification of specific habitat features to be retained and/ or relocated. For example, occupation surveys for wombat burrows, application of exclusion measures / deterrents prior to vegetation clearing / earthworks, works undertaken in presence of spotter / catcher. Protocols for fauna handling and management of adverse incidents. Fauna monitoring and management protocol including identification and reporting of fauna mortalities to the relevant Biodiversity Conservation Division office.
TRC_18	Heritage	<ul style="list-style-type: none"> Council is not supportive of the nominated transport route and the strategy for negotiating the Devil's Elbows by constructing a new road which directly impacts on the local heritage listed site known as the Black Snake Gold Mine on Lot 440 DP 822503 (Item No. I134 in the Tamworth Regional Local Environmental Plan 2010). 	<ul style="list-style-type: none"> In consultation with TRC further analysis of the proposed Devil's Elbow bypass road considered factors including: viability of the public road network, extent of earthworks, biodiversity impacts, heritage impacts, geometry of the road upgrade and visibility of the works. The 'Devil's Elbow Proposed Upgrade – Geophysical Interpretative Report' (Coffey, 2021) was completed in March 2021 (provided in Appendix O of the Amendment Report) to assess potential for subsurface voids relating to abandoned mine workings, and other possible anomalies that may indicate the presence of archaeological features. The geophysical investigation identified three resistivity anomalies (Areas 1, 2 & 3). While it is possible that these areas are the result of natural geological processes unrelated to the Black Snake Gold Mine, it is considered they are likely to be associated with abandoned (historic) mine workings such as tunnels. Based on Coffey's extensive tunnel design experience it is expected that these potential tunnel areas would be very unlikely to be structurally impacted by road excavation so as to cause any subsidence or collapse provided that they have at least 5 m of sound rock cover and span less than 4 m and measures such as heavy blasting are avoided. Turnbull Engineering confirms that additional geotechnical investigation is required to confirm the exact existing shaft locations, capacity, ground conditions, design loading and road pavement design before a detailed treatment solution could be produced to directly avoid impact. If subsequent geotechnical engineering modelling / assessment determines there is potential for the proposed road to impact potential subsurface historic mine workings/voids or for these to impact the road, various design or construction management strategies may be implemented to avoid impacts, such as: <ul style="list-style-type: none"> Amending the road alignment, or proposed cut/fill earthworks for road construction. Raising the road level with fill at critical locations. Ground improvement treatment to strengthen ground over the tunnels. Use of bridging slabs over critical sections (expected to be narrow given hand dug).

Reference No.	Theme	Submission	Response
			<ul style="list-style-type: none"> Based on the outcomes of the geophysical assessment (Coffey, 2021) further design work was completed for Devil's Elbow bypass by experienced design and construct contractor (Wallbridge Gilbert Aztec (WGA) who have designed over 15 wind farms in Australia) which presents updated alignment and avoids cut above the identified potential mine workings. The realigned and redesigned bypass road is identified in Figure 3-1c of the Amendment Report. A number of structural engineering solutions have been recommended by Coffey to ensure structural integrity of any subsurface voids in proximity to the works, and these will be confirmed during detailed design where necessary. A Revised SOHI was completed to address the indirect impacts of the Project on the Black Snake Gold Mine LEP historic environment. The revised SOHI concludes that construction of the 'Devil's Elbow' proposed transport route upgrade will have no adverse indirect impacts through removal of secondary growth vegetation and minor cut and fill activities on the listed item. During consultation with TRC on 15 November 2021, the Proponent committed to undertaking further geophysics, engineering assessment and heritage protocols / approvals during detailed design of the final alignment. Heritage controls, such as possible archaeological monitoring during earthworks in potential anomaly areas, will be contingent on the results of further geotechnical analysis. Heritage controls and/or mitigation measures will be detailed in the Project's EMS and Heritage Management Plan. The Revised SOHI suggests that heritage interpretation relating to the transport alignment upgrade should be investigated as a possible community value-add, in terms of development into a unique future heritage interpretation site. This could include interpretative signage, possibly as part of a heritage trail, or potentially expose a section of historical diggings if possible from an engineering solution. This recommendation is subject to local Council and community interest and advice of feasibility.
TRC_19	Soil and Water (Peel Valley Catchment)	<ul style="list-style-type: none"> Council is concerned that it is unable to fully understand the extent of potential impact on the catchment in the absence of adequate detail in respect to the ancillary industrial components of the Project. Therefore, Council is also unable to assess the ability of the development, (noting its scale), to appropriately mitigate the potential environmental impacts of those ancillary industrial operations and the consequent impact on the catchment. 	<ul style="list-style-type: none"> The impacts on the Peel Valley Catchment were extensively assessed in the EIS and Soils and Water Assessment. Following geotechnical assessment, a further detailed Soils and Water Addendum Report has been prepared and provided as Appendix N to the Amendment Report. The impact on the Peel Valley Catchment is therefore properly assessed and no material environmental impacts are expected to occur. The Soil and Water Addendum Report reinforces commitments for water quality management to be achieved using specific erosion and sediment controls based on The Blue Book (Landcom, 2004) and certified by a CPESC. A revised analysis of the Peel River Catchment was undertaken in section 5.1 of the Soil and Water Addendum Report. The extent of the total Development Footprint within the Peel River catchment upstream of Chaffey Dam is 216 ha, representing only 0.51% of its 420 km² sub catchment area. These small catchments are primarily located up-gradient of first order streams. Further, it is noted that WaterNSW's response did not raise any concerns regarding the impact on the catchment.
TRC_20	Soil and Water (Water supply)	<ul style="list-style-type: none"> The submitted EIS is unclear on the likely source of external water supply required for concrete batching and construction activities. It is recommended a water balance report be undertaken to determine the likely impact of the development on water resources and in particular on adjoining landholders. Further investigations/certainty regarding the sources of water is required, as this will need to be considered as part of the water balance and by other external referral agencies. 	<ul style="list-style-type: none"> A final decision on preferred water supply option/s will be determined at the construction phase of the Project. There are feasible options for the supply of water for the 24-month Project construction period. The four viable options available to source the estimated 55 ML of water required for construction include: <ul style="list-style-type: none"> council water supply, with agreement with the relevant Council(s); extraction from an existing nearby landowner bore, with agreement from the landowner; extraction from a new groundwater bore; and extraction from a surface water source (e.g. Chaffey Dam or the Peel River). If water is assessed to be best sourced through extraction of a new groundwater bore or other water sources covered by water sharing plans, all required Water Access Licences and approvals will be applied for and obtained.
TRC_21	Visual Impact	<ul style="list-style-type: none"> Council requests that the Proponent be required to consider clustering/reduction of turbines to achieve a reduction in the visual dominance of the towers the on the ridgeline and also reduce impact on biodiversity. 	<ul style="list-style-type: none"> The Project has removed five (5) turbines from the proposal, which will reduce the visibility to the Project from private residences. There was one existing property (NAD10a) previously assessed to have high impact as a result of the Project. An agreement has been reached with this landowner who acknowledges the construction and operation of the Project and does not object to any visual or noise impact that may occur. The transmission line alignment has been modified and assessed to reduce visibility to residents along Crawney Road. An Addendum Landscape and Visual Impact Assessment which considers the Project amendments is included in Appendix G of the Amendment Report. Since exhibition feedback was received from TRC with concern for impacts of night lighting required for aviation safety. The Proponent has engaged with CASA who agreed to a night lighting plan requiring 28 of the 65 turbines be lit (refer Appendix J of the Amendment Report). Lower intensity lighting of 200 candela from 2,000 candela has been accepted by CASA and with one steady light (as oppose to two flashing lights) on those turbines required to be lit. A 200 candela light has been assessed as difficult to discern in excess of 3 km (refer Appendix J of the Amendment Report).

Reference No.	Theme	Submission	Response
			<ul style="list-style-type: none"> Aviation shields have been committed to further reduce the night lighting impact to residences within 6km of a turbine lit.
TRC_22	Bushfire risk	<ul style="list-style-type: none"> Council requests further information regarding the mechanisms the Proponent intends to put in place to avoid catastrophic bushfire outbreaks. Clarification is requested of the potential of the Wind Towers to impact on the ability to undertake aerial firefighting duties. This is especially relevant in light of the recent bushfire that went through the area and the required aerial support necessary to save dwellings and property. It is also unclear whether an appropriate assessment has been made in the event of a mechanical failure to a wind turbine generator. Has an appropriate assessment been made that demonstrates an ability to undertake aerial firefighting duties within the Project area? 	<ul style="list-style-type: none"> The EIS and Bushfire Risk Assessment recognises that it is not possible to guarantee that catastrophic bushfire outbreaks can be avoided during a major fire event such as the recent 2019/2020 season. Despite the mitigation measures and treatments that are put in place, it is noted that some bushfire risk will always remain and that some of the infrastructure may be subject to direct flame contact and may require aerial support. The NSW RFS and Australasian Fire and Emergency Services Council (AFAC) have worked together to develop a national position on wind turbines (AFAC 2018). This position paper concludes that wind farms are not expected to adversely affect fire behaviour in their vicinity. Local wind speeds and direction are already highly variable across landscapes affected by turbulence from ridgelines, tall trees and buildings. Any risk of wake turbulence from wind turbines influencing fire behaviour will be mitigated through the shutting down of wind turbines in a bushfire event. Where possible, blades will be stopped in the 'Y' or 'rabbit ear' position, as this positioning allows for the maximum airspace for aircraft to manoeuvre underneath the blades and removes one of the blades as a potential obstacle. Sufficient planning for access roads and the increased APZ around key assets will reduce the risk of wind farm ignitions spreading beyond the property and reduce the risk of external fire impacting wind farm infrastructure. NSW RFS, Civil Aviation Safety Authority (CASA) and the RAAF Aeronautical Information Service would be provided with maps and GPS coordinates of the final wind turbine layout and identification information for individual wind turbine sites for their internal response planning. Further to this, NSW RFS will be encouraged to visit site to familiarise themselves with the new infrastructure including road layout during construction. Access to the wind farm site and any onsite fire-fighting equipment will be made available to NSW RFS during times that no project personnel are on site. As identified in Bushfire Risk Assessment, it is possible that the windfarm infrastructure will sustain direct flame contact. Aerial support was used during the 2019/2020 fires, and it is recognised that the windfarm would result in additional assets that would need to be protected during future bushfire events. Consultation with NSW RFS has confirmed that as the WTG towers are made from non-combustible material and do not present a significance risk, efforts would be concentrated on defending those assets that could contribute to widespread fire. Key assets such as the switching station, substation, BESS and O&M buildings will be located outside of the flame zone. The Bushfire Risk Assessment does not assess the individual design or engineering components of the turbines, or the risk of mechanical failure to a wind turbine generator. It is also noted that wind turbine monitoring technology is utilised to ensure that electrical, mechanical and hydraulic systems are functioning correctly and to isolate equipment if operating thresholds such as temperature or blade speed are reached. In terms of impacts on aerial firefighting, NSW Rural Fire Service was consulted during the preparation of the AIA and advised as follows: <ul style="list-style-type: none"> "We have no comments on the proposed wind farm. Wind farms will be treated like any other potential hazard to aircraft operations." Operational guidelines regarding water-bombing setbacks from WTGs will be developed and distributed to fire authorities. A Bushfire Emergency Management and Operations Plan will be developed in conjunction with relevant stakeholders, including NSW RFS, NSW Fire and rescue, NPWS, FCNSW, adjoining property owners and employees prior to construction.
TRC_23a	Social Impacts (Community Enhancement Fund)	<ul style="list-style-type: none"> Council has several concerns regarding the Community Enhancement Fund (CEF) Charter as proposed. <ol style="list-style-type: none"> The contribution of \$2,500 per operating turbine is considered to be very modest considering that the proposed Hills of Gold turbines are considerably larger both in physical scale and power generation than existing wind farms. 	<ul style="list-style-type: none"> The Proponent has engaged with TRC to further negotiate a mutually Consultation has been ongoing with TRC staff as summarised in Chapter 4. All requests by TRC have been accepted and an updated offer was submitted in July 2021. This offer is attached in Appendix G of the Submissions Report. The Proponent has increased its funding contribution to \$3,000 per turbine based in the Tamworth LGA and committed to funding \$168,000 per annum plus inflation, which is the exhibited number of turbines in Tamworth LGA prior to turbine reductions presented in this report. This would need to be reassessed if the number of turbines built materially changed from the 65 turbines now proposed. Changes have been made to the TRC Voluntary Planning Agreement including increased administration fees, an independent chair who is project neutral with a good community standing, and the fund operating independently from the VPA agreed with Upper Hunter Shire Council. The Proponent has committed to an additional Construction Funding Community Grants program aimed at community programs during the construction period. Funding of \$150,000 has been committed. The Proponent formalise marketing and application process and consult with TRC and the community prior to commencement of construction.
TRC_23b		<ol style="list-style-type: none"> The delay in providing funds to the community until the commencement of the operation of the first turbine is questioned. It will be during the construction phase that most disruption is likely to be caused. There appear to be good opportunities for providing sponsorship during the construction phase to various groups such as school sports and activities, community groups and events prior to the activation of the CEF. 	
TRC_23c		<ol style="list-style-type: none"> There appears to an inherent complexity to the operation and administration of the CEF considering the reasonably modest amounts involved. The proposed committee structure of 11 participants from the various towns, localities and Councils seems unwieldy. It is considered that the twice yearly bid processes may be better managed in this case by a once a year process. It seems likely that the burden on the three Councils resources would exceed \$5,000/year 	

Reference No.	Theme	Submission	Response
TRC_23d		d) It should be considered whether this may be better facilitated by a working group of Council rather than a S.355 committee. The working group might best be convened by an independent person with a legal, accounting or administrative background for the first two years to establish and activate the process.	
TRC_23e		e) The CEF structure seems to have become accepted practice and the potential funds available over 25 years could be significant depending on the agreed payment by the operator. Council acknowledges that this would provide a notable cumulative benefit to the local community if the administrative complexities and costs can be managed.	
TRC_23f		f) Prior to accepting the CEF in lieu of a voluntary planning agreement Tamworth Regional Council, in company with the other affected Councils, requires the opportunity to finalise the details of the CEF regarding potential timing, criteria and process to improve the potential administration of the Fund.	

Table 5-21: Upper Hunter Shire Council (UHSC) Submission Responses

Reference No.	Theme	Submission	Response
UHSC_1	Socio economic (CEF)	<ul style="list-style-type: none"> The proposed CEF contribution of \$2,500 is deemed insufficient and is less than the contributions paid by other recently approved wind farms. Figure of \$3,000 per turbine per year requested. The legal and governance framework around the proposed CEF is unclear. As such, it would be preferable for the Proponent to enter into a joint VPA with Tamworth Council, Liverpool Ranges Shire Council and Upper Hunter Shire Council to enable the payment of development contributions by the Proponent towards a CEF which is administered by the Councils and a CEF committee. 	<ul style="list-style-type: none"> Ongoing consultation has been conducted with all Upper Hunter Shire Council with meetings on the 5 March 2021 and subsequently on the 29 March 2021. Both meetings addressed the Community Enhancement Fund commitments. A revised letter of offer was submitted to Upper Hunter Shire Council and is attached in Annexure G.
UHSC_2	Visual impacts	<ul style="list-style-type: none"> The proposed wind turbines are densely spaced along the ridgeline forming the LGA boundary and will be highly visible from a number of properties. Consideration should be given to reducing the number of turbines and/or increasing the spacing of the turbines in areas where they are highly concentrated to mitigate the potential visual impact. 	<ul style="list-style-type: none"> The Project has been subject to significant refinement following the publication of the EIS. In assessing the impact of potential turbine clustering, turbines 19 and 23 have subsequently been removed to aid in the reduction of this impact. Additional visual assessments have also been conducted on impacted dwellings within the Council's LGA with a view to further assessing potential mitigation strategies and further turbine layout reviews where required. These amendments to the project layout have been outlined in the Amendment Report.
UHSC_3	Biodiversity	<ul style="list-style-type: none"> Whilst biodiversity offsets will be required to ensure no net loss of biodiversity overall, the proposal will result in the loss of biodiversity within the locality. We recommend that the Proponent consider reducing the development footprint in areas containing high condition native vegetation, TEC's and TFH to further minimise impacts. 	<ul style="list-style-type: none"> Ongoing analysis of PCT's and updates to the BDAR have been undertaken. This has resulted in further refinement to the Project layout, which significantly reduce biodiversity impacts. These changes can be found in the Amendment Report. A total reduction to the Development Footprint of 213ha has been achieved through Project amendments which effectively reduces the impacts to biodiversity within the locality.
UHSC_4	Community	<ul style="list-style-type: none"> UHSC noted that correspondence from residents of the Timor area has raised significant concerns with the proposal and the extent of community consultation undertaken by the Proponent. 	<ul style="list-style-type: none"> Consultation with the Timor community has involved the following: <ul style="list-style-type: none"> Newsletters Engagement through the CCC Direct Contact and home visits during technical assessment surveys Photomontages from public viewpoints Photomontages in the library Photomontages for residents outside of the requirements of the guidelines Direct email correspondence Phone calls A Community Information Hub set up in Nundle for 6 weeks, residents of Timor and Crawney visited Neighbour agreements were offered to residents living within 5 km of a proposed turbine. There was a Community BBQ held on the 17th of April 2021, which included the attendance of 25 Timor community members and representatives from both ENGIE and Someva. The meeting minutes can be found in the Consultation Material at Appendix C. Additional Visual Assessments have been prepared for two dwellings in Crawney/Timor within 5 km of the Project following ongoing consultation with both Council and DPIE. A winter edition of the Community Newsletter was issued on the 11th of August 2021 via the Hills of Gold Website and via letterbox drop in the area. A Business Survey for Nundle and Hanging Rock and Timor Businesses was issued on the 11th of August 2021.

Table 5-22: Cessnock City Council Submission Responses

Reference No.	Theme	Submission	Response
CCC_1	Project Support	<div><div></div><div>Cessnock City Council does not object to the development.</div></div>	<div><div></div><div>Noted.</div></div>

6 RESPONSES TO ORGANISATION AND COMMUNITY SUBMISSIONS

- Submissions from community organisations and the public have been reviewed and responded to be based on key themes as described in Section 2.1.
- Consultation with community groups and public submitters was undertaken to better understand issues raised in the submissions and provide early responses where available. Consultation undertaken with community organisations is discussed in Section 4.3 Stakeholder Engagement and the associated Stakeholder Engagement Register (refer to Appendix C).
- A summary of the issues raised, response to the issues, consultation undertaken to address the issue and resulting Project changes are detailed in **Table 6-1** below. Detailed responses to community organisation and community submissions is provided in Appendix B of the Submissions Report.
- This demonstrates how:
 - the issues and concerns raised by community organisations and the public have been considered by the Proponent;
 - further engagement has been actively undertaken to understand community concerns;
 - the Proponent has proactively responded to the issues raised by way of response and / or Project amendments;
 - the Proponent has re-assessed environmental, social and economic impacts in response to Project amendments; and
 - the Project has achieved an overall reduction of environmental and social impacts.

Acronyms and Abbreviations:

HOGPI	Hills Of Gold Preservations Inc
TC	Timor Community
YLG	Yass Landcare Guardians
UPLG	Upper Peel Landcare Group
FKAG	Friends of Kentucky Action Group
PTSD	PTSD Volunteer Group
NHVSS	Newcastle and Hunter Valley Speleological Society
TRRRRA	Tamworth Regional Residents and Ratepayers Association
ACKMA	Australian Cave and Karst Management Association
EIS	Environmental Impact Statement
RtS	Response to Submissions Report, also referred to as the Submissions Report

Table 6-1: Summary of Response to Community Organisation and Community Submissions

Group	Matter raised	Response/Revised Assessment	Consultation Undertaken (consultation addressed in Chapter 4)	Project Change/ Reduced Impact
Biodiversity				
Community Hills Of Gold Preservations Inc (HOGPI) Timor Community (TC) Yass Landcare Guardians (YLG) Upper Peel Landcare Group (UPLG) Friends of Kentucky Action Group (FKAG) Newcastle and Hunter Valley Speleological Society (NHVSS) Australian Cave and Karst Management Association (ACKMA)	Loss of habitat and placing local wildlife under stress	<ul style="list-style-type: none"> The Proponent considered targeted layout changes for the Project to avoid habitat associated with species with the greatest risk of potential impacts and in particular any threatened species to the extent practicable. AECOM provided an assessment of vegetation and associated habitat that could be avoided following a more detailed design of the transmission line route. The assessment is provided in Appendix I of the Updated BDAR (Appendix D of the Amendment Report). Biosis provided input into areas of greatest significance and identified areas where impacts could be avoided. Input was received from a wind farm construction contractor to potential design changes to avoid high condition habitat and reduce the Development Footprint. The Proponent used this information to make Project changes as detailed in the Amendment Report. These changes were assessed by Biosis resulting in significant reduced habitat impacts presented in the updated BDAR. 	<ul style="list-style-type: none"> Meetings with TRC emphasised impacts on fauna, particular concern raised towards Koala, Wombat and bat habitat. TRC were seeking to see further reduction in impact and Proponent committing to greater mitigation for unavoidable impacts and in particular the BBAMP. Meeting with HOGPI emphasised concerns relating to native species. Meeting with UHSC sought clarification on fauna impacts and mitigation strategies. Meeting with BCD sought greater detail on the Greater Glider impacts as a Matter of National Environmental Significance. Meeting with TC emphasised importance of native species in the area. 	<ul style="list-style-type: none"> Changes to the Project are addressed in Chapter 3 and Appendix A of the Amendment Report. These changes included removal of turbines, redesign of hardstands, removal and relocation of temporary and permanent site facilities, realignment and in some cases removal of access roads. The result is a reduction in the Development Footprint from 513 ha to 300 ha, of which 100 ha is estimated to be permanent and the remaining 200 ha will be rehabilitated. These refinements and amendments have avoided and materially reduced the biodiversity impacts of the project as summarised in the table provided in the response to TRC_15 achieving avoiding impact to 276ha of threatened native fauna species habitat. Additional commitments to find and relocate species during pre-construction surveys to high condition habitat adjacent to the project as part of a Biodiversity Management Plan will be agreed with DPIE and BCD. Further detail is provided in the response to TRC_17 on updated mitigation commitments.
	The risk to bats communities via habitat loss, collision risk and barotrauma	<ul style="list-style-type: none"> Additional geomorphological assessment was carried out to assess the potential for microbat roosts and breeding habitat. A microbat cave roost inspection was carried out between 29 March 2021 and 1 April 2021. Serious and irreversible impact (SAIL) assessments were updated for microbat species. A qualitative risk assessment was completed for impacts associated with bird and bat turbine strike, as well as a turbine specific risk assessment. Further detail is provided in the response to TRC_13. 	<ul style="list-style-type: none"> Meetings with TRC, HOGPI, BCD, UHSC, TC all raised concerns regarding impact to bat habitat. 	<ul style="list-style-type: none"> As detailed in Chapter 3 of the Amendment Report, the Proponent has removed from the Project of 3 high 'risk of impact' turbines, and relocated the remaining high risk turbine to outside of the microbat habitat roosting habitat and buffers. 1 turbine with moderate risk of impact has also been removed. As a result of targeted field survey, significant refinement has been achieved for previously assumed potential roosting / breeding habitat locations for cave dwelling bats including the threatened Eastern Cave Bat, Large Bent-winged Bat, Little Bent-winged Bat and Large-eared Pied Bat within and surrounding the development footprint. The former conclusion of a potential significant impact to Large-eared Pied Bat has been updated to unlikely and SAIL assessment for microbats is no longer being required. Further detail is provided in TRC_13, 14 and 15 as well as in in Section 8.8 of the Updated BDAR. The Proponent has also updated its commitments to prepare and implement a Bird and Bat Adaptive Management, which will ensure a researched and consulted approach to wind turbine construction and operational changes. Further detail of these commitments is provided in TRC_14.
	Tree and vegetation loss	<ul style="list-style-type: none"> Additional surveys to collect BAM plot data were carried out in March 2021 by four botanists over 100 person hours with collection of 24 additional plots. This included collection of plot data within the sections of 'Devil's Elbow' proposed for re-alignment, and along Morrisons Gap Road. A detailed response to vegetation mapping is provided in EES_3 and updates to Figure 6, Pages 1 to 21 "Plant Community Types" provide mapping of vegetation verification points across the development corridor. 	<ul style="list-style-type: none"> Meetings with TRC, HOGPI, TC and UHSC raised concerns regarding extent of impact to native vegetation. Consultation with residents along the transport route regarding vegetation removal has occurred through emails, phone calls and face to face meetings. 	<ul style="list-style-type: none"> Changes to the Project to reduce loss of trees and vegetation are addressed in the Project Amendment Report Chapter 3. The changes contributing to reduced vegetation impacts include the removal of 5 turbines and relocation of 2 turbines, redesign of hardstands, removal and relocation of temporary and permanent site facilities, realignment and removal of access roads. <p>The results of the refinements are that the biodiversity impacts of the Project have been materially reduced including:</p> <ul style="list-style-type: none"> a reduction in native vegetation impact by 75 ha (from 208 ha to 132 ha), being a 39% reduction. In particular, 42% of previously assessed high condition vegetation was avoided in the latest

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		<ul style="list-style-type: none"> Targeted project redesign was carried out with support from Biosis and AECOM. Further information is available in the Updated BDAR. 		<p>design revision. impacts to threatened ecological communities were reduced by 41 ha.</p> <ul style="list-style-type: none"> Table 2 in the Updated BDAR summarises the reduced impacts to native vegetation. Further detail on the reduced impact to Threatened Ecological Communities is summarised in TRC_15. The Proponent has further committed to best practice processes for minimising the unavoidable residual direct impacts noted above including: <ul style="list-style-type: none"> Pre-clearing protocols, including pre-clearing inspections, establishment of exclusion zones and on-ground identification of specific habitat features to be retained and/or relocated. Vegetation clearing protocols will be followed including staged habitat removal, fauna handling and unexpected threatened species finds procedures for species (including of wombats, Koala, and other fauna) and any specified seasonal limits on clearing activities. More detail is provided in Chapter 8.9 Mitigating and Managing Impacts in the Updated BDAR.
	Impacts to the local Eagle population	<ul style="list-style-type: none"> 41 days of surveys across two years were completed by ARUP and included bird utilisation surveys such as transects, nocturnal spotlighting, call playback and broadcast, targeted species (owls) and habitat identification (hollows and stick nest surveys). Surrounding areas, including the Ben Halls Gap Nature Reserve were captured in the survey efforts. The BDAR concludes that the impact to eagles as a result of the Project is likely to be insignificant on the local population of eagles due to the configuration of Hills of Gold turbines. 	<ul style="list-style-type: none"> Consultation with residents who are interested in bird activity has taken place through the community information hub, emails and phone calls to interested residents. 	<ul style="list-style-type: none"> Changes have been made to the Project layout to improve bird connectivity across and around the Project. This includes the removal of WP 31, adjacent to Ben Halls Gap National Park, and WP 23 and WP 27 all benefiting connectivity impacts to the Ben Halls Gap National Park. The removal of WP 19 results in an increase separation gap from 1 – 1.5km between turbines in this location, to approximately 2.1km between turbine WP 18 and turbines WP 20-22 reducing habitat connectivity impacts in an area of the wind farm where moderate condition habitats occur on either side of the ridgeline. The closest turbine to the Crawney National Park, WP 1 has also been removed to further reduce impacts associated with biodiversity, and also improve potential connectivity impacts across high condition native vegetation.
	Adequacy of biodiversity survey methodology	<ul style="list-style-type: none"> Surveys were conducted by suitably qualified consultants in accordance with relevant laws and guidelines. Further work has been done since the EIS to further add to the already extensive knowledge of the existing environment and the potential impacts of the Project. The response provided in EES_3 provides details of the updated surveys and where additional information has been provided for survey methodology in the Updated BDAR. Additional surveys to collect BAM plot data were carried out in March 2021 by four botanists over 100 person hours with collection of 24 additional plots. This included collection of plot data within the sections of 'Devil's Elbow' proposed for re-alignment, and along Morrisons Gap Road. An additional 24 vegetation integrity plots were carried out in accordance with the BAM and the results are summarised in chapter 4.1.4 Vegetation Condition plots of the updated BDAR. Table 19 in Section 4.2.3 of the Updated BDAR provides a detailed summary of the PCTs, vegetation zones, condition, extent, integrity score and associated TECs for the total combined development footprint, which has been used in 	<ul style="list-style-type: none"> Feedback was provided by BCD on where further information should be provided to justify plant community type identification. 	<ul style="list-style-type: none"> Three additional BAM plots were undertaken at the Devil's Elbow. Updated design of the proposed bypass road has reduced impact from 17 ha (presented in the EIS) to 2.5 ha of native vegetation impact. The transmission line has been realigned across the Project site to avoid mapped native vegetation. This has also reduced the visibility of the transmission line along Crawney Road.

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		assessing the impacts of the project. This information was used as the basis for a combined vegetation zone map for the entire development footprint (Figure 7, Pages 1 to 26).		
	Impact to surrounding nature reserves	<ul style="list-style-type: none"> The 1,500 m landscape buffer was assessed in the context of connectivity around the Development Footprint. The field survey methodology for target fauna species that could be subject to indirect impacts as a result of the wind farm operation, specifically birds and bats, is sufficient to detect any animals that may move through the site and utilise BHGMR. 	<ul style="list-style-type: none"> It was agreed through consultation with the DPIE Biodiversity, Conservation and Science Directorate that a number of rapid Plant Community Type (PCT) verification and habitat assessment points would be carried out within the Ben Halls Gap Nature Reserve, where it is adjacent to the development footprint to improve on previous survey efforts. Consultation with NPWS was undertaken on the draft responses including further detail and justification of the existing survey efforts. HOGPI raised concerns in a meeting for surrounding indirect impact to nature reserve. 	<ul style="list-style-type: none"> The Proponent has removed 3 turbines assessed as having the potential for high impact to native bat species. This includes the removal of WP 31, adjacent to Ben Halls Gap National Park, and WP 23 and WP 27 all benefiting connectivity impacts to the Ben Halls Gap National Park. The closest turbine to the Crawney National Park, WP 1 has also been removed due to impacts associated with biodiversity, also improving potential connectivity impacts across high condition native vegetation. The Proponent has updated its commitments in Table 72 “Proposed Mitigation Measures” in Section 8.9 of the Updated BDAR for inclusion in the Biodiversity Management Plan. Further detail is provided in TRC_12. The Proponent is also pursuing Biodiversity Stewardships Sites and wildlife corridors to connect neighbouring National Parks and Nature Reserves. Further information is provided in the response below.
	Risk of bird strike	<ul style="list-style-type: none"> Section 8.3.2 Collision Risk (birds) of the Updated BDAR (Appendix D of the Amendment Report) has been updated to include a qualitative risk assessment of each bird species at risk. This includes a project specific risk assessment for the potential for turbine strike impacts for each bird species in Table 59. Section 8.3.2 Collision Risk (birds) of the Updated BDAR (Appendix D of the Amendment Report) further assesses potential risk of impact to threatened species associated with turbine placement, barriers to movement and potential collision with turbine blades. A qualitative risk assessment has been prepared on a per turbine basis and is included in Table 61. 	<ul style="list-style-type: none"> Consultation with BCD regarding updating the assessment for Collision risk. 	<ul style="list-style-type: none"> The Proponent has removed 3 turbines (WP 23, WP 27, WP 31) which had a high risk of impact and 1 turbine (WP 1) creating a moderate risk of impact. Two additional turbines (WP 50 and WP 2) with either high or moderate risk to impact have been relocated to create greater buffer to habitat mapped. Prior to the commissioning of any wind turbines, the Proponent will prepare a Bird and Bat Adaptive Management Plan for the wind farm in consultation with BCS, and to the satisfaction of the Planning Secretary. This plan will include a detailed description of the measures that will be implemented on site for minimising bird and bat strike during operation of the development.
	Threat to endangered species such as Koalas, Greater Gliders, Booroolong Frog and Spotted-Tailed Quoll	<ul style="list-style-type: none"> The Project has been further refined to reduce potential risks to endangered species, while still enabling the significant social and economic benefits, which the Project offers to be delivered. Protocols will be adopted to spot and relocate any endangered species such as Koalas to higher quality neighbouring nature reserve if found in pre-construction surveys. Within 10 kilometres of the Development Footprint, Koala species has been recorded seven times, with an additional two individuals recorded within the Development Footprint during the current field assessment. The area is considered low activity for Koala. Generally the Project impacts on fragmented lower quality habitat and effective protocols will be adopted to spot and relocate any endangered species such as Koalas to higher quality neighbouring nature reserve if found in pre-construction surveys. See Chapter 5.3.2 “Terrestrial Fauna Survey Methods” in the Updated BDAR for survey methods and 5.4.2 of the Updated BDAR for updated 	<ul style="list-style-type: none"> A meeting with HOGPI emphasised concerns relating to threatened species. Similar concerns were raised by TC. 	<ul style="list-style-type: none"> Further detail on Project amendments and associated reduction in native threatened fauna impacts is included in response to TRC_15. The map on page 12 of the Updated BDAR presents the avoided species as a result of the project changes. This includes a reduction of: <ul style="list-style-type: none"> 14 ha of Koala Habitat 12.3 ha of Eastern Pygmy-possum 10.1 ha of Squirell Glider 0.95 ha of Booroolong Frog All remaining impacts will be fully offset via biodiversity offset credits as required by the NSW Biodiversity Offset Scheme and the EPBC Act Offsets Policy to ensure no net loss to biodiversity. Table 72 “Proposed Mitigation Measures” in Section 8.9 of the Updated BDAR has been updated to list additional proposed mitigation measures for inclusion in the Biodiversity Management Plan. The following summarises the measures for risk management to Fauna injury/mortality that will be adopted during construction: <ul style="list-style-type: none"> Strategies for fauna management during construction including any identification roles, responsibilities and

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		assessment and results on impact to Koala, Greater Glider and the Spotted Tail Quoll.		<p>contingency measures such as temporary stop works and engagement of fauna specialist.</p> <ul style="list-style-type: none"> Requirements for temporary fencing to minimise the risk of fauna injury / mortality due to vehicle strike or entrapment in deep excavations. Pre-clearing protocols, including pre-clearing inspections, establishment of exclusion zones and on-ground identification of specific habitat features to be retained and/ or relocated. <p>For example, occupation surveys for wombat burrows, application of exclusion measures / deterrents prior to vegetation clearing / earthworks, works undertaken in presence of spotter / catcher.</p> <ul style="list-style-type: none"> Protocols for fauna handling and management of adverse incidents. Fauna monitoring and management protocol including identification and reporting of fauna mortalities to the relevant Biodiversity Conservation Division office.
	Adequacy of the Biodiversity Offset Plan	<ul style="list-style-type: none"> A Biodiversity Offset Strategy has been prepared to provide further options to compensate for unavoidable impacts and the results are summarised in Chapter 9.1 of the Updated BDAR and in full in Appendix E of the Amendment Report. Local offset feasibility has been assessed in a biodiversity offset strategy including a combination of field surveys and desktop analysis of target properties. Information on the estimated available local credits is provided in Section 9.1.2 of the Updated BDAR. This is expected to provide further options to compensate for unavoidable impacts and achieve no net loss of biodiversity. 	<ul style="list-style-type: none"> Neighbouring landowners have been consulted for hosting Biodiversity Stewardship sites. Agreements have been reached with neighbouring landowners required to host stewardship sites and improve habitat connectivity between neighbouring National Parks and Nature Reserves. 	<ul style="list-style-type: none"> The Project's proposed offset strategy of targeting local properties for the establishment of Biodiversity Stewardship Sites provides potential opportunities for strategic enhancement of local habitat connectivity. Such enhancements could occur along the southern side of the ridgeline between Ben Halls Gap Nature Reserve and Crawney Pass National Park, and over Crawney Mountain to Wallabadah Nature Reserve, linking the three conservation areas. This enhancement of local connectivity is intended to be achieved through the in-perpetuity conservation agreements, which will improve the biodiversity values on the land and increase habitat connectivity. Any connectivity enhancements realised in this strategic location would not only offset direct impacts resulting from the project, but would also allow for potential indirect impacts associated with disruption of habitat connectivity to be mitigated against and offset through the establishment of a managed corridor linking local conservation reserves and high-quality habitats.
Traffic and transport				
Community Yass Landcare Guardians (YLG) Hills Of Gold Preservations Inc (HOGPI)	Increased traffic volumes through Nundle	<ul style="list-style-type: none"> An updated Traffic and Transport Addendum has been completed by TTPP to assess the revised traffic impacts through Nundle and the Level of Service (LoS) at Lindsays Gap Rd/Nundle Rd and Oakenville St/Jenkins St intersections remain unchanged by the Project construction traffic at a LoS A rating. Regarding the revised assessment of local road capacity, in all cases the LoS on local roads is equal to or better than the LoS B which is better than the recommended desirable LoS C. Daily trips through Nundle during peak construction have reduced from 502 to 311 trips. 50% of these daily trips are Project workers traveling in light vehicles. Further restrictions are placed on heavy vehicle travel times to reduce impacts to residents of Nundle. 	<ul style="list-style-type: none"> Residents along the proposed delivery routes, including private landowners that would be required to support road access upgrades for project component delivery, were consulted. The landowner located on the Head of the Peel Road was consulted. A meeting took place with Nundle Business Marketing and Tourism Group to discuss traffic mitigation. The project changes are a result of consultation and submissions from Tamworth Regional Council, Transport for NSW, residents and businesses of Nundle and Hanging Rock. Further consultation was undertaken with construction contractors as part of the design refinement process and the impact on traffic estimates during construction for heavy vehicles. A survey was sent out to businesses in Nundle and Hanging Rock, which asked for feedback on traffic mitigation measures during construction. 	<ul style="list-style-type: none"> In response to community and private landowner feedback, the Project has committed to one preferred delivery route along Barry Road and Morrisons Gap Road. Use of Head of the Peel Road as a Project delivery route has been removed from the Project. This has resulted in reduced number of residents that Project traffic will pass, including within residential areas of Nundle, and reduced private land required to support road access upgrades. The Project now includes no movement of OSOM vehicles and significantly reduced construction related traffic on Crawney Road, Jenkins St, Gill St and Innes St. Following further consultation with construction contractors regarding heavy vehicle ('Trucks') traffic movements and resulting project design refinements, estimates for daily trips through Nundle during peak construction have significantly reduced from 502 to 311 trips total. The Proponent has also now proposed to construct a dedicated construction carpark, implement carpooling, implement voluntary parking restrictions in Nundle and construct a pedestrian crossing in Nundle (subject to further consultation with TRC) further mitigation measures following feedback.

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	Lack of consultation with Forestry Corporation and cumulative impacts to school bus routes	<ul style="list-style-type: none"> ■ Consultation with Forestry Corporation has been ongoing throughout the preparation of the EIS, and Forestry Corporation provided a submission of “Support” to the Project following exhibition of the EIS. ■ Assessment of the cumulative impact of forestry trucking has been considered in Chapter 12.3.3 of the EIS. 	<ul style="list-style-type: none"> ■ Ongoing consultation with Forestry Corporation. ■ Consultation with locals regarding the current school bus operating times and routes. ■ Forestry Corporation support the proposed project as per their submission. ■ Consultation with MSC. 	<ul style="list-style-type: none"> ■ The Project has committed to ensuring transportation of OSOM vehicles will occur outside the times in which the local school buses are in operation. ■ Further consultation will occur with school bus operators and Forestry Corporation during preparation of the Traffic Management Plan for the Project.
	Safety to residents, pedestrians and other road users caused by increased OSOM vehicle usage	<ul style="list-style-type: none"> ■ The removal of Head of Peel Road as a proposed access route has reduced the number of local roads and residents that OSOM Project vehicles will need to pass. ■ OSOM vehicles for the Project will be under escort in consultation with TfNSW. ■ The Project has also proposed a range of revised traffic mitigation measures to improve project-related transport safety and reduce traffic impacts on residents. ■ OSOM vehicle movements for the Project equate to an average of 5.6 movements per day assuming 6 available transport days per week. It should be noted that existing logging trucks create 72 movements one-way per day and the additional impact to traffic volumes as a result of the Project’s OSOM movements is not significant from the New England Highway to the Project Area. 	<ul style="list-style-type: none"> ■ Local Nundle Businesses were consulted on the proposed transport mitigation measures in Nundle and Hanging Rock, including gathering information on business operating times to inform the voluntary parking restrictions. ■ Consultation with TRC on the proposed transport changes. ■ Consultation with TfNSW. ■ Consultation with MSC. ■ Community Information Hub discussions with local residents regarding safety during increased traffic and transport during construction. ■ Consultation with residents of Morrisons Gap Road and Shearers Road regarding existing safety concerns and opportunities for the project to improve safety along the road. 	<ul style="list-style-type: none"> ■ The Project no longer includes Head of the Peel Road as a proposed access route for OSOM vehicles, removing the need for OSOM vehicles using Herron Street North, Innes Street, Jenkins Street, and Gill Street. ■ The Proponent has also now proposed to construct a pedestrian crossing in Nundle as a further mitigation measure, subject to approval of TRC, following feedback. A speed limit for project vehicles will be implemented along Morrisons Gap Road for OSOM traffic and In Vehicle Monitoring system (IVMS) of project vehicles traveling to and from site to monitor speed will be implemented. ■ The introduction of a layby and localised road widening to allow localised 2-way traffic along Morrisons Gap Road to further facilitate safe road use. (Please see attached map of proposed layby). ■ A Traffic Management Plan for the Project will also stipulate that movement of heavy vehicles (including OSOM) is to avoid school peak times in Nundle (including along Barry Road, Nundle Road, Crawney Road and Lindsays Gap Rd) from 8:00am – 9:30am and 2:30pm – 4:00pm weekdays or as updated based on relevant times at the time of construction. ■ Further commitments including parking restrictions in Nundle for Project vehicles, a temporary carpark in Nundle for Project vehicles, and additional laybys along the transport route have been introduced to further reduce traffic impacts to local residents.
	Dust generation on unsealed sections of proposed delivery routes	<ul style="list-style-type: none"> ■ The removal of Head of Peel Road as a proposed access route has reduced the risk of dust generation from the project on unsealed roads. ■ Morrison’s Gap Road is currently an unsealed road that will be maintained throughout construction, and sealed following construction. ■ Dust generation from the project will be managed in accordance with the Conditions of Consent, Environmental Protection Licence, and environmental management plans. 	<ul style="list-style-type: none"> ■ Consultation with Morrison’s Gap Road residents about road upgrades, maintenance, and traffic management. ■ Consultation with TRC regarding road upgrades, maintenance, and traffic management. 	<ul style="list-style-type: none"> ■ Removal of Head of the Peel Road as a proposed access route reduces the risk of dust generation from the Project. ■ Dust mitigation measures will be implemented along Morrisons Gap Road, including surface polymers and water carts, throughout construction to reduce the risk of dust generation. ■ The Project has committed to sealing Morrison’s Gap Road after construction, in consultation with TRC. ■ Vehicle escorts for larger OSOM loads to ensure safe passage for residents on Morrisons Gap Road and Shearers Road.
	Viability of Morrisons Gap Road	<ul style="list-style-type: none"> ■ The Traffic and Transport Assessment presented in the EIS confirms the viability of Morrisons Gap road as the preferred project access route. The revised Addendum has been updated in the context of Morrisons Gap Road being selected as the chosen access route for the Project. ■ The Project engaged a NSW registered surveyor to complete detailed survey of the existing road and cadastral boundary survey. ■ Turnbull Engineering was engaged to prepare preliminary road designs with the use of the survey data. These designs confirm that the required road upgrades to enable Project vehicle access can be completed within the public road corridor, without impact to non-associated private land. 	<ul style="list-style-type: none"> ■ Consultation with Morrison’s Gap Road residents about road upgrades, maintenance, and traffic management. ■ Consultation with TRC regarding road upgrades, maintenance, and traffic management. 	<ul style="list-style-type: none"> ■ A detailed Traffic Management Plan (TMP) will be prepared in consultation with residents on Morrisons Gap Road and Shearers Road. The TMP will incorporate management and mitigation measures to ensure safety and convenience to users of Morrisons Gap Road, including: <ul style="list-style-type: none"> – localised road widening for safe passing of traffic; – OSOM vehicles under escort; – voluntary project speed limits along MGR; – addition of a new layby for passing OSOM traffic; – provision of UHF radios to local residents; – improvements to road safety in steep sections; and – extensive community communication protocols for latest project traffic updates.

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		<ul style="list-style-type: none"> Impacts to biodiversity along the transport route, including Morrisons Gap Road, have been assessed in the revised BDAR. Please see Appendix P in the Amendment Report for reference to the survey and updated preliminary designs. 		<ul style="list-style-type: none"> The Project has also offered vegetation screening from the road for any resident's dwelling that is impacted by removal of vegetation within the public road corridor. MGR will be sealed following the construction of the Project to improve road access for all residents and the Project.
	Disruption caused by required road upgrades	<ul style="list-style-type: none"> Disruption to the local community during construction of required road upgrades will be reduced as much as practicable. Access along public roads will be maintained at all times, however minor delays would be expected while road upgrades are being completed. Secondary consents, including Section 138 permits and Works Authorisation Deeds, will be required to be obtained from the road authorities prior to construction of the road upgrades. The permit process will require the preparation and approval of a Traffic Control Plan to manage the impacts on local traffic. 	<ul style="list-style-type: none"> Consultation with Morrison's Gap Road residents on required road upgrades. Consultation with private landowners along the transport route supporting the project for access upgrades. Consultation with TfNSW. Consultation with TRC. Consultation with MSC. 	<ul style="list-style-type: none"> Design refinement to the Devil's Elbow bypass road and Morrisons Gap Road, as well as other intersection designs along the transport route, have been completed to limit the impacts of road upgrades as much as practicable, and to ensure safe access for all project vehicles is enabled. These updated designs are available in Appendix P of the Amendment Report. As Devil's Elbow is proposed to be a private bypass road, very little disruption to public road users is expected during construction of the road in this area. Any disruption will be managed in accordance with secondary consents with either TRC or TfNSW as relevant.
	Road maintenance commitments during construction and operational phases	<ul style="list-style-type: none"> Pre and post dilapidation surveys covering the pavement, drainage, and bridge structures will be undertaken in consultation with Transport for NSW and local Councils for the proposed transport routes before and after construction. Regular inspections and consultation with local Councils will be undertaken on roads during construction. Any damage to roads resulting from project construction traffic will be repaired. 	<ul style="list-style-type: none"> Consultation on road upgrades, dilapidation, road maintenance, and repair undertaken with TfNSW and local Councils. 	<ul style="list-style-type: none"> Revised commitments have been made to MSC and TRC. Letters of Offer are provided in Appendix G of this Submissions Report.
	Viability of Devil's Elbow and the impact to Black Snake Gold Mine	<ul style="list-style-type: none"> The design of the Devil's Elbow bypass has now been optimised and is considered a viable and good option for the Project, with minimal visual or heritage impacts. An independent analysis of possible Project delivery routes by Siemens-Gamesa (a global leading wind turbine supplier) originally identified Barry Road including the Devil's Elbow bypass road as the optimal delivery route for the project. This analysis considered many factors including: viability of the public road network, extent of earthworks, biodiversity impacts, heritage impacts, geometry of the road upgrade, and impact to residents along the route. Coffey International undertook geophysical investigations in February 2021 to identify potential mine tunnels. The results of this are in Appendix O of the Amendment Report. Further design work was completed for Devil's Elbow bypass by experienced design and construct contractor (Wallbridge Gilbert Aztec (WGA) who have designed over 15 wind farms in Australia) which presents updated alignment, 3D designs including drainage, tie-in with walking trails, and safety considerations. This is presented in Appendix P of the Amendment Report. The updated design for the Devil's Elbow bypass avoids direct impacts to Black Snake Mine entrance and design and construction commitments to avoid underground mines. 	<ul style="list-style-type: none"> Thorough consultation undertaken with TRC to discuss: <ul style="list-style-type: none"> the optimal route of the proposed bypass road, including recommendations to avoid the gully and location of the mine entrance; road safety features and tie in with Barry Road at top and bottom; the historic heritage assessment of the former Black Snake Gold Mine listed under the LEP and request to further assess the residual indirect heritage impacts to the area; and providing access to the bypass road for Council and/or local agencies such as RFS. The Proponent then consulted with TRC further on the optimised road design following TRC recommendations. Site visit undertaken with Soil Conservation Service to determine optimal route for the bypass road and mitigation of environmental impacts. SCS confirmed the viability of construction for the proposed road. Consultation and site visits with a number of leading road construction contractors in the Australian wind farm industry. All contractors confirmed the viability of construction for the proposed road. Consultation with two industry leading transport and logistics companies on the optimised road design who confirmed the suitability of the road design for project component delivery. Consultation undertaken by ERM with a local resident experienced in the historic value of the area. 	<ul style="list-style-type: none"> Barry Road including Devil's Elbow Bypass road is the chosen delivery route for the Project, and this eliminates impacts to 14 landowners along the previously proposed Head of Peel Road route, and avoids residential areas of Nundle. Following further technical assessment and thorough consultation with relevant stakeholders, an optimised Devil's Elbow bypass road design has been completed by WGA which significantly reduces the disturbance footprint and biodiversity impacts of the proposed road, avoids the Black Snake Gold Mine entrance, and avoids the gully through the area in consultation with TRC.

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		<ul style="list-style-type: none"> An updated landscape and visual impact assessment of the proposed Devil's Elbow Bypass confirms in the context of the surrounding land use, the visual impact is very low and existing vegetation will screen the bypass road within close proximity. This is presented in more detail in Appendix G of the Amendment Report. An Amended Statement of Heritage Impacts confirms that the Project will have negligible adverse indirect impacts to the historic environment of Black Snake Gold Mine and identifies an opportunity to enhance heritage interpretation through conservation and tourism. This is presented in Annexure Q of the Amendment Report. 	<ul style="list-style-type: none"> Consultation with local RFS and NPWS on the proposed bypass road. RFS have confirmed value in gaining access to this bypass road once complete for their activities. Consultation has occurred with NTS Corporation as representatives of the Gomeroi Native Title Applicants as well as with Crown Lands on the existing use and management of this land. 	
	Adequacy of assessment of vegetation removal on transport route	<ul style="list-style-type: none"> Additional surveys were undertaken along the transport route including at Devil's Elbow and along Morrisons Gap Road. This has confirmed the existing vegetation along the proposed alignment and allowed the project team to design a solution that minimises impact. Following the removal of Head of the Peel Road, and design refinements along the preferred transport route, the updated BDAR re-assesses the revised vegetation impact. 	<ul style="list-style-type: none"> Consultation with landowners and residents along the transport route to discuss potential vegetation removal. 	<ul style="list-style-type: none"> Project changes and refinements have resulted in a significant Development Footprint reduction for the transport route upgrades from 56 ha (EIS) down to 9 ha. Up to 50% of the transport route upgrades will be rehabilitated with native species. Impact at the Devil's Elbow has reduced from 17 ha to 2.5 ha of native vegetation.
	No park zones in Nundle during OSOM transportation	<ul style="list-style-type: none"> A small area on Oakenville St is proposed to become a temporary no-parking zone during the transport of oversize and over mass loads. There remains parking opportunities prior the Nundle Road/Oakenville St intersection on 3 sides of the intersection. There also remains parking opportunities on Jenkins St on both sides prior to and after the Nundle Rd/Oakenville St intersection. 	<ul style="list-style-type: none"> Consultation with residents and businesses in Nundle. Community Information Hub discussions with residents to discuss questions regarding the no park zone. Consultation with Community Consultation Committee Members on these proposed changes 	<ul style="list-style-type: none"> The Proponent has committed to parking restrictions and constructing a car park within Nundle for Project vehicles to further reduce the parking impacts to local residents. The carpark will be suitable for up to [50] vehicles and will not be sealed. It will be rehabilitated following completion of the construction phase.
	Impact of attractiveness of area on tourism due to construction traffic	<ul style="list-style-type: none"> Tourism operators providing accommodation, entertainment, food and services are likely to benefit from increased demand from temporary workforces frequenting the area and surrounding towns, and this has been confirmed by a recent local business survey conducted which concluded the overwhelming majority of businesses along the transport route are in favour of the proposed project changes. The updated traffic assessment concludes that all roads leading into Nundle used by the Project (notably Nundle Road and Lindsays Gap Road) are rural "rolling" roads and would continue to operate at Level of Service A, the highest Service Level. Peak traffic is only expected to occur during morning and evening peak hours which are unlikely to affect most tourists. 	<ul style="list-style-type: none"> Further consultation with TRC on proposed transport and traffic commitments in local area. Local business survey conducted to obtain feedback on proposed project changes including relating to traffic impacts within Nundle. The majority of businesses responding supported the amended project changes. 	<ul style="list-style-type: none"> A number of additional traffic impact mitigation measures have been introduced to further reduce the impacts of construction traffic on local residents and tourists, including: parking restrictions, project car park, OSOM delivery time restrictions. Concerns were also raised on tourism vehicles being slowed by oversize over mass vehicles. Additional layby's have been added along the transport route to further reduce this impact.
	Use of the Head of the Peel Road	<ul style="list-style-type: none"> Use of Head of the Peel Road as a project delivery route has been removed. 	<ul style="list-style-type: none"> Residents along the proposed delivery routes, including private landowners that would be required to support road access upgrades for project component delivery on this route. 	<ul style="list-style-type: none"> Use of Head of the Peel Road as a project delivery route has been removed.

Group	Matter raised	Response/Revised Assessment	Consultation Undertaken (consultation addressed in Chapter 4)	Project Change/ Reduced Impact
Project Justification				
Community Friends of Kentucky Action Group (FKAG)	Site suitability	<ul style="list-style-type: none"> The Project is located in an area that is highly suited to wind farm development, and is aligned with NSW Government policy. The NSW Government is proposing amendments to State Environmental Planning Policy (Infrastructure) 2007 to include specific matters of consideration for utility scale solar and wind energy development near certain regional cities to protect land identified for future growth and the character and visual landscape qualities of the identified regional areas. An Explanation of Intended Effect was exhibited in September-October 2021. The proposed amendments to the ISEPP relating to emerging potential land use conflicts do not apply to regional towns in proximity to the Project and, accordingly, will not apply to the Project. However, as outlined in Section 2 of the EIS and further discussed in Section 2.1 of the Amendment Report, the Project has been designed to minimise potential land use conflicts while delivering broader public benefits in the context of supporting State and Commonwealth strategies and renewable energy targets, as well as Australia's international obligations to reduce greenhouse gas emissions, meeting future energy demands, and contributing to economic development in the region. Site suitability is addressed in full in section E2 of the executive summary of the EIS and also section 4.4 of the EIS. The ridgeline south of Hanging Rock (known as the Hills of Gold) was selected based on a set of factors that determine the viability of a wind farm to produce clean energy, limit the impact to the environment and residents of the area, provide benefits to the community surrounding it, complement the existing energy infrastructure and support government policy. From these factors it was determined that the Hills of Gold Wind Farm: Aligns with the NSW Governments Electricity Strategy, Tamworth Regional Blueprint 100, Transmission Infrastructure strategy, NSW Electricity Roadmap and the New England North West Regional Plan. Has shown it exhibits a high wind resource from detailed 10-year site studies. This is demonstrated in Figure 2-1 of the Amendment Report. Is isolated and is in an area of low population density with limited residents within 4 km of the Development Footprint. Is located 13.5 km from the Liddell to Tamworth 330 kV transmission line with capacity to accept the generation capacity from the Project, along with the ability for this Project to take advantage of the committed and in construction Queensland to NSW interconnector upgrades in Tamworth and along this line. Is well located in close proximity to regional towns to provide economic benefit to the communities 	<ul style="list-style-type: none"> In person consultation with residents of Nundle and Hanging Rock to discuss the suitability of the site. Community Information Hub posters on display during public exhibition, with project information and context on the suitability of the site. 	<ul style="list-style-type: none"> The detailed assessments carried out have confirmed that site is suitable for a wind farm and that the residual impacts of the Project, which have been further reduced as a result of the additional changes made to the Project, can be effectively managed while delivering the significant public benefits offered by the Project.

Group	Matter raised	Response/Revised Assessment	Consultation Undertaken (consultation addressed in Chapter 4)	Project Change/ Reduced Impact
		within and surrounding such as Hanging Rock, Nundle and surrounds.		
	Benefits of renewable energy over fossil fuels being questioned	<ul style="list-style-type: none"> Australia has one of the highest per capita emissions of Carbon Dioxide in the world contributing 1.1 % of total emissions in 2020. This has led the energy sector in Australia to undergo a clean energy transition from a centralised system of large fossil fuel generation towards a decentralised system of widely dispersed renewable energy generators. This Project will contribute to this direction. A study done by Vestas (a turbine manufacturing company) stated that the 'carbon payback' time of a turbine ranges from 5-12 months. This was backed up by an independent US research team, which stated that a turbine with a life span of 20 years will have a net benefit on energy and carbon within 5 to 8 months. With the ongoing plans of decommissioning many of NSW's coal fired power plants, AEMO has stated that a further 26-50 GW of varied Large-scaled Renewable Energy is required to maintain energy demand and meet baseload requirement. With variation in generation and good storage a renewable energy-based market can satisfy baseload requirements. This project will add up to an additional 420 MW of generating capacity and 100 MW/400 MWh battery storage to the existing renewable energy projects aiding in energy security and providing storage for the grid. 	<ul style="list-style-type: none"> Community Information Hub discussions with residents to explain the benefits of renewable energy as opposed to fossil fuels. 	<ul style="list-style-type: none"> The benefits of renewable energy over fossil fuels are well understood and based on robust evidence.
Landscape and Visual				
Community Hills Of Gold Preservations Inc (HOGPI) Timor Community (TC) Yass Landcare Guardians (YLG) Friends of Kentucky Action Group (FKAG) Newcastle and Hunter Valley Speleological Society (NHVSS)	Overall impact of the Project on the natural landscape of the surrounding area	<ul style="list-style-type: none"> Overall, the Project is considered to have material public benefits, which outweigh any adverse effects on the natural landscape and surrounding area. In Appendix F: Landscape and Visual Impact Assessment (LVIA) in the EIS it is acknowledged that wind turbines in a rural landscape will alter the view and the change will depend greatly on the viewer's sensitivity and acceptance of change. Furthermore, the topography surrounding the turbines, will reduce visibility from many vantage points from Nundle and Hanging Rock townships. The comments in the LVIA submitted in the EIS summarise that within the local setting the combination of topography and local influences such as the existing vegetation significantly reduce visibility towards the proposed turbines. Details are provided from a number of vantage points that were advised through community consultation and the CCC prior to lodgement of the EIS. 	<ul style="list-style-type: none"> A community survey was sent out to residents of Nundle and Hanging Rock, with one of the questions asking residents to list public viewpoints they would like assessed. A site visit to public viewpoints occurred where landscape and visual consultants visited viewpoints in Nundle and Hanging Rock. There were preliminary public viewpoint photomontages on display in Nundle Library from the 22nd of June 2020. Final public viewpoint photomontages were produced and were on display in the Nundle Library and in the Community Information Hub in the Nundle War Memorial Hall From the 2nd of December 2020 until the 29th of January 2021, which was the end of the public exhibition period for the project. 	<ul style="list-style-type: none"> The Project has committed to remove 5 turbines, which will reduce the visibility to the Project from private residences in Crawney and Timor predominately. An Addendum Landscape and Visual Impact Assessment presented the changes assessed is included in Appendix G of the Amendment Report.
	Visual impact to individual properties	<ul style="list-style-type: none"> The voluntary Neighbour Benefit Sharing Program and landscaping mitigation commitments can effectively mitigate visual impact to individual properties. Further assessment has been conducted since the EIS to ensure that visual impacts have been further assessed and mitigated. There were 23 private dwellings that were assessed in App E Dwelling of Appendix F: Landscape and Visual Impact Assessment with a wireframe 	<ul style="list-style-type: none"> The Project team along with expert visual consultants visited 30 private dwellings during a three-day site visit in June 2020. There has been ongoing consultation with those residents regarding visual impacts has taken place via phone calls, face to face meetings and emails. Furthermore, two site visits took place to private dwellings for visual assessment purposes during the development of the Submissions Report. 	<ul style="list-style-type: none"> A further 7 assessments have been produced for the additional dwellings and each has been assigned a visual impact rating in accordance with the guidelines. The results of this addendum assessment are included in Appendix G of the Amendment Report. The proposed visual impact mitigation measure included in Appendix G of the Amendment Report is screen planting, which includes the following recommendations. Planting to be undertaken post construction of the Wind Farm.

Group	Matter raised	Response/Revised Assessment	Consultation Undertaken (consultation addressed in Chapter 4)	Project Change/ Reduced Impact
		<p>provided for every dwelling and a photomontage where turbines were visible.</p> <ul style="list-style-type: none"> There were also 10 public viewpoints assessed, which can be used as representative viewpoints for private residences in Nundle, Hanging Rock and Crawney. A further 7 private dwellings have been assessed since the end of public exhibition. 		<ul style="list-style-type: none"> 50/75 Litre tree stock to ensure plants establish for moderate impact dwellings. Tree trunk protection to prevent damage to plant stock due to animals. Consultation with landowner regarding tree species selection and use of local wholesale nursery. The site was selected due to a relatively low number of existing residential dwellings within 5 km for a project providing the scale of benefits. There are 56 dwellings within 5 km. High impacted dwellings have been reassessed as moderate following removal of turbines and with vegetation screening if determined effective, or through neighbour agreements being reached. There remains 1 existing dwelling and 1 proposed dwelling with high visual impacts and 9 existing dwellings that have been assessed as moderate impact with potential for effective visual screening. All existing dwellings meet shadow flicker guidelines.
	Visual impact of aviation lighting	<ul style="list-style-type: none"> Visual impacts of aviation lighting have been properly assessed and will be mitigated by the Proponent. In Appendix F: Landscape and Visual Impact Assessment, Section 11 in the EIS the project mentioned the details of night lighting if they were to be required by the Civil Aviation Safety Authority (CASA) and a Zone of Visual Influence (ZVI) was presented demonstrating the visibility of aviation lighting on the surrounding areas was also produced. An updated ZVI has been prepared based on the night lighting plan accepted by CASA. An updated assessment of the distance of 200 candela light and the lighting plan is provided in the Addendum Landscape and Visual Impact Assessment in Annexure G. 	<ul style="list-style-type: none"> There has been consultation with CASA regarding amended lighting intensity for the turbines. CASA confirmed reduce intensity night lighting. There has been engagement with DPIE and their independent visual consultant on night lighting assessment requirements. A night lighting plan was prepared by Aviation Projects and sent to CASA for confirmation. CASA has accepted the night lighting plan which is provided in Annexure J. 	<ul style="list-style-type: none"> A night lighting plan that reduces the number of turbines required to have lights has been endorsed by CASA and provide in Appendix J of the Amendment Report. Aviation shields will be implemented to further reduce the night lighting impact to residences. The Addendum LVIA states that shielding can effectively reduce the impact on dwellings within up to six (6) km of the Project, and that the efficiency of shielding would be increased for the project due to the elevation difference between turbines and dwellings. CASA have revised their previous recommendation and accepted that the Project can use low intensity lighting of (200 Candela) rather than medium intensity (2000 Candela) aviation lighting. CASA have agreed to the Obstacle Lighting Plan prepared for the Project (refer Appendix J of the Amendment Report) which nominated 28 of 65 turbines to have lighting installed at hub height. The Addendum Landscape and Visual Impact Assessment assesses the visual impacts which will result from night lighting if this is required by the DPIE (refer Appendix G of the Amendment Report). This included a Zone of Visual Influence to illustrate the potential number of visible aviation lights (installed at hub height) from surrounding land. The assessment indicates dwellings within 4,550 m, at most, have the potential to see up the nine (9) aviation lights. Land to the east (associated with Head of Peel Road) indicates between 10 – 19 aviation lights have potential to be viewed. Land in this area is generally uninhabited. It is important to note that the ZVI does not take into account intervening elements (such as vegetation) that significantly reduce potential to view lighting and so is a very conservative assessment.
	Photomontage methodology	<ul style="list-style-type: none"> In Appendix F: Landscape and Visual Impact Assessment, Section 14 an overview of the methodology for the dwelling assessments and photomontage process is explained. There is also an assessment table, which summarises the visual assessment at each dwelling within 4.55 km of the Project. All viewpoints selected for photomontages were done in accordance with the NSW Wind Energy: Visual Assessment Bulletin, community consultation and a desktop assessment of the areas surrounding the Project. 	<ul style="list-style-type: none"> Further visual assessments have been completed following submissions on the project and consultation with residents. Two additional site visits to private residences have taken place. Public viewpoint photomontages were on display in Nundle Library and in the Community Information Hub at the Nundle War Memorial Hall during public exhibition. Photomontages were sent to residents via email and representative photomontages were sent to residents. 	<ul style="list-style-type: none"> A desktop visual assessment or photomontage has been produced for an additional 7 dwellings. Turbines 23 and 19 were removed to reduce the visual impact to dwellings on the Crawney side of the Project. The removal of WP 1, 27 and 31 also provide improvements to some residents on the Crawney side. The Addendum Landscape and Visual Impact Assessment is provided in Annexure G of the Amendment Report.

Group	Matter raised	Response/Revised Assessment	Consultation Undertaken (consultation addressed in Chapter 4)	Project Change/ Reduced Impact
	Effectiveness of Vegetative screening	<ul style="list-style-type: none"> An updated assessment has been carried out in the Addendum Landscape and Visual Impact assessment in Appendix G. It presents the information regarding visual screening through planting vegetation and its effectiveness. A wireframe and montage have been prepared from AD_74 to demonstrate the effectiveness of screening. An assessment of elevation differences towards the view of turbines and the effectiveness of visual screening was completed for NAD_5. 	<ul style="list-style-type: none"> There have been discussions with landowners regarding the option for visual screening have been mentioned in consultation with landowners within 5 km of the Project. 	<ul style="list-style-type: none"> Visual screening mitigation measures have been updated in the Addendum Landscape and Visual Impact Assessment and will be offered to those residents it will be effective for and are within 4.55 km of the Project. The following additional mitigation measures will be implemented for high to moderate impacted dwellings within 4.55 km: <ul style="list-style-type: none"> planting to be undertaken post construction of the Wind Farm; 50 / 75 Litre tree stock to ensure plants establish; recommended evergreen tree species that reach a minimum height required to sufficiently screen turbines; and tree trunk protection to prevent damage to plant stock due to animals. <p>It is recommended tree species selection is to undertaken in discussion with the landowner and local wholesale nursery and / or landscape contractor to suit local conditions.</p>
	Impact of shadow flicker	<ul style="list-style-type: none"> In EIS Appendix F: Landscape and Visual Impact Assessment, Section 10 information is available on methodology used to complete the shadow flicker assessment. The conservative worst-case assumptions that were used when calculating the shadow flicker is that the sun is shining all day from sunrise to sunset, the turbines are always on and the turbine is perpendicular to the direction of the sun. The conservative nature of these assumptions means that actual impacts are likely to be significantly less than modelled. The results of modelling indicated 9 dwellings will experience shadow flicker with one dwelling slightly exceeding the 30-hour guideline for Non-Associated Dwellings, however it is considered that vegetation surrounding these dwellings will mitigate any potential impacts. 	<ul style="list-style-type: none"> Consultation has taken place with dwellings regarding the shadow flicker results. 	<ul style="list-style-type: none"> The Project will be operated to ensure full compliance with shadow flicker limits imposed. Where required and agreed with relevant landowners, the Project will provide mitigation to further reduce any shadow flicker impacts such as installing blinds and planting vegetation screening for dwellings identified as being impacted.

Noise and vibration

Community Hills Of Gold Preservations Inc (HOGPI) Timor Community (TC) PTSD Volunteer Group (PTSD)	Potential effects on health and wellbeing	<ul style="list-style-type: none"> The Project has been designed to ensure that noise and vibration criterion as set out in the Wind Energy Noise Assessment Bulletin is met through both the construction and operational phases. Consideration for the impacts of noise and vibration has been addressed in section 10 of the EIS. A Noise and Vibration assessment was undertaken by Sonus for the construction and operation of the Project (refer Appendix E) in accordance with the SEAR's. Sonus, who are experts in conducting noise assessment for wind farms have done extensive analysis which has involved background noise monitoring, a noise propagation model to assess the noise at identified dwellings, noise generated by ancillary infrastructure, construction noise, traffic noise and an assessment of vibration. It is noted that the Wind Energy Noise Assessment Bulletin states that "while exposure to environmental noise is associated with health effects, these effects occur at much higher levels of noise than are likely to be perceived by people living in close proximity to wind farms in Australia". 	<ul style="list-style-type: none"> Consultation with community members when assessing noise impacts from project traffic and transport. Community Information Hub consultation with residents who had questions regarding health and wellbeing. 	<ul style="list-style-type: none"> The presented layout and committed operational strategy mean the project can be operated within the limits as specified in the relevant noise guidelines. As such no amendment were made on account of noise impacts.
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Group	Matter raised	Response/Revised Assessment	Consultation Undertaken (consultation addressed in Chapter 4)	Project Change/ Reduced Impact
		<ul style="list-style-type: none"> Additional noise assessments were undertaken following the exhibition of the EIS. The National Research and Medical Centre (NHRMC) conducted a study in 2015 focusing on the health impacts of wind farms and their concluding result outlined in their NHRMC Statement: Evidence on Wind Farms and Human Health. The report finding was, 'After careful consideration and deliberation of the body of evidence, NHMRC concludes that there is currently no consistent evidence that wind farms cause adverse health effects in humans.' 		
	Noise assessment methodology	<ul style="list-style-type: none"> Sonus undertook the independent noise assessments for the Project. Noise monitoring locations were chosen to provide data indicative of noise levels at sensitive receivers within the vicinity of the wind farm and with respect to the requirements of the NSW Planning and Environment Wind Energy Noise Assessment Bulletin. Sonus used CONCAWE noise propagation models and soundPLAN noise modelling software to establish the relevant noise predictions from the Project. All existing and approved dwellings surrounding the wind farm have been assessed for noise impacts. Further details can be found in Appendix E of the EIS. 	<ul style="list-style-type: none"> Consultation with Sonus who has provided additional background and responses to methodology of chosen locations and monitoring criteria in Appendix F of the Amendment Report. 	<ul style="list-style-type: none"> The noise assessment methodology was appropriate and extensive noise impact assessment has been carried out for the Project.
	Impact of noise and vibration during construction and operational phases	<ul style="list-style-type: none"> Comprehensive noise impact assessment was undertaken by Sonus as part of the EIS (Appendix E). Further assessment has since been undertaken to take into account project refinements and amendment (Appendix F of the Amendment Reports) Further assessment of construction related traffic and impacts to residents along the transport route has been completed and is summarised in Chapter 6.2 of the Amendment Report and Appendix F of the Amendment Reports The noise assessments confirm that noise impacts can be adequately managed and mitigated through conditions of consent. 		<ul style="list-style-type: none"> Changes to Project transport route have reduced impact of noise to residents of Nundle, along Crawney Road, and NAD_33 on Head of the Peel Road. The batching plants have been relocated, and an additional option for O&M location has been added, these changes are presented in the Amendment Report and don't create any additional noise impacts. A number of mitigation strategies are proposed to be implemented to minimise impacts and ensure compliance with The Interim Construction Noise Guideline, such as noise insulating machinery and muting reversing alarms on vehicles. Further details can be found in the Noise and Vibration Assessment in Appendix E to the EIS.
Hazards				
Community Hills Of Gold Preservations Inc (HOGPI) Timor Community (TC) Friends of Kentucky Action Group (FKAG)	Potential for increased likelihood of bushfires	<ul style="list-style-type: none"> The Bushfire Risk Assessment Report has been updated due to the changes in the Project layout. This has not resulted in any material changes to conclusions previously exhibited. This report includes the management and mitigation measures that are to be put in place for the full lifecycle of the Project, which is available in the updated Bushfire Report in Appendix K of the Amendment Report. It is noted that improved access created by the Project will aid the RFS and NPWS in their back burning operations as was undertaken in 2018 and 	<ul style="list-style-type: none"> NSW RFS confirmed the requirement for a Bushfire Emergency Management and Operations Plan to be prepared and shared with NSW RFS, NSW Fire and Rescue, NPWS and Forestry Commission NSW HOGPI and the Timor/Crawney have raised this in previously held meetings and responses were prepared following the meeting. 	<ul style="list-style-type: none"> The updated assessment found that the new locations have similar bushfire constraints to the previously assessed locations and do not present any greater risk to that already addressed in the EIS.

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		successfully stopped the Pages Creek Road Fire along this ridgeline.		
	Potential for restricted access for fire-fighting services	<ul style="list-style-type: none"> The final layout maps of the wind farm would be recorded in the incident action plan, and lodged with the local NSW RFS. Fire suppression aircraft will treat the wind turbines in a similar fashion to high voltage transmission lines and would be recorded and considered in the incident action plan, thus not resulting in any increased risk to aerial fire fighters. As stated above access will be improved along the ridgeline due to upgraded access tracks. 	<ul style="list-style-type: none"> See above consultation with NSW RFS and relevant councils. 	N/A
	Proposed fire mitigation measures	<ul style="list-style-type: none"> All Balance of Plant (BOP) and turbines have a minimum standard of fire mitigation measures in place through both construction and operational phases. All construction and maintenance staff will be trained in basic first response firefighting. Asset Protection Zones (APZ) will exist around all turbines and BOP. 	<ul style="list-style-type: none"> Residents of Timor and Crawney were consulted during BBQ in April 2021. Following this information was shared in response to questions noted during the meeting and provided by the community following the meeting. 	N/A
	Dangers of blade and ice throw	<ul style="list-style-type: none"> A Preliminary Hazards Analysis (PHA) report has been prepared following public exhibition (Arriscar, 2021). This report includes consequence analysis of Fire/explosion, blade/ice throw and tower collapse. The conclusions of this report are summarised in the DPIE responses in Chapter 5. The PHA is provided in Appendix L of the Amendment Report. The PHA states that maximum cumulative risk of impact due to blade throw, tower collapse or nacelle collapse for WTG No. 60, 61, 62, 64, 65 and 66 is approximately 0.06 pmpy at the closest residence (AD_5). This is lower than the DPIE risk criterion of 1 pmpy, which applies for residential uses. Further, the maximum ice throw hazard range (473 m) is significantly less than the distance to the closest residence (viz. c. 765 m to AD_5). 	<ul style="list-style-type: none"> Consultation with some residents along Morrisons Gap Road and Shearers road regarding the updated blade and ice throw assessment. 	<ul style="list-style-type: none"> The Project has now been amended to include an option for the location of the O&M facility to reduce risk of blade throw incident. The Project will be carried out with a comprehensive and robust O&M programme to prevent and detect faults quickly.

Soils and Water

<p>Community Hills Of Gold Preservations Inc (HOGPI) Friends of Kentucky Action Group (FKAG) Newcastle and Hunter Valley Speleological Society (NHVSS) Australian Cave and Karst Management Association (ACKMA)</p>	Adequacy of detail offered in the hydrological impact assessment	<ul style="list-style-type: none"> A Soil and Water Addendum Report has been completed which summarises the further findings regarding site hydrology, including details on a geotechnical and geophysical investigation undertaken on site in over 2 weeks in February 2021. The geotechnical investigation understood a number of different sub-soil investigations including ground water testing. The addendum report is provided in Appendix N of the Amendment Report. 	<ul style="list-style-type: none"> HOGPI and TC have raised that more detail is required when assessing soil and water in relation to the Project. The Project has responded by providing further detailed assessment. 	<ul style="list-style-type: none"> Design mitigation measures have been included in section 6 of the Soil and Water Addendum Report in Appendix N of the Amendment Report.
	Erosion and landslip risk associated with construction on steep slopes	<ul style="list-style-type: none"> Section 16.3.3 of the EIS provided details of the Hydrology Assessment carried out. The assessment identifies all the water courses within the area and examines the impact the Project and its infrastructure will have on them. This is also summarised in Table 16-5 -Potential construction impacts on soils and water. Subsequently, the Soil and Water Addendum Report summarises findings of the site geotechnical and geophysical investigation regarding erosion and landslip risk associated with construction, and 	<ul style="list-style-type: none"> UHSC and TRC were consulted on the updated assessment. 	<ul style="list-style-type: none"> Optimised wind farm design layout to minimise bulk earthworks and associated disturbance to soils and biodiversity. This includes the reduction of 5 turbines from the original layout, reduced access road length and optimised batters, relocation of WP 47 to reduce slope, removal of WP 1 which was located on a narrow section of ridgeline, and re-orientation of the WP02 hardstand. These Project changes have contributed to the overall reduced development footprint from 513 ha to 300 ha. Removal of the Head of the Peel Road as a transport route option avoids significant road construction up complex steep terrain.

Group	Matter raised	Response/Revised Assessment	Consultation Undertaken (consultation addressed in Chapter 4)	Project Change/ Reduced Impact
		<p>provides suitable mitigation strategies to manage erosion during construction. Results of mass movement events in the development corridor were not evident.</p> <ul style="list-style-type: none"> An aerial Lidar survey was conducted to obtain further site-based information on local ground contours in order to vastly improve site slope mapping, minimise construction slopes and optimise the project layout. The Development Footprint has been optimised to minimise bulk earthworks and associated disturbance to soils and biodiversity. By locating the Development Footprint along the ridgetop the Project has primarily avoid steep upper slopes to the ridgeline. Many other constructed NSW wind farms incorporate some similar narrow ridgelines in their development. Further site assessment confirms that the overall Development Footprint at the wind farm site does not meet the data requirements for LSC Class 7 or Class 8, which are generally land that is incapable of sustaining agricultural land use. Revised RUSLE calculations are provided in Appendix A (Updated Erosion Hazard Assessment) which considers optimised project design, updated rainfall modelling, and hardstands and compacted surfaces, to inform runoff and erosion mitigation. 		<ul style="list-style-type: none"> Based on the revised Erosion Hazard Assessment and RUSLE calculation in Appendix A, the erosion hazard for the majority of the Development Footprint has been assessed as moderate. Design mitigation measures have been included in section 6 of the Soil and Water Addendum Report in Appendix N of the Amendment Report.
	Effects project infrastructure will have on water runoff and existing water catchments	<ul style="list-style-type: none"> The Project has been effectively designed to minimise impacts on water catchments and mitigation measures will be put in place to prevent water impacts. Runoff Management is further address in section 5.2 of the Soil and Water Addendum Report provided as Appendix N of the Amendment Report. A revised analysis of the Peel River Catchment was undertaken in section 5.1 of the Soil and Water Addendum Report. The extent of the total Development Footprint within the Peel River catchment upstream of Chaffey Dam is 216 ha, representing only 0.51% of its 420 km2 sub catchment area. These small catchments are primarily located up-gradient of first order streams. Water quality management will be achieved using specific erosion and sediment controls based on The Blue Book (Landcom, 2004) and developed by an experienced Certified Practitioner in Erosions and Sediment Control (CPESC). 	<ul style="list-style-type: none"> HOGPI and TC have raised that more detail is required when assessing soil and water in relation to the project. 	<ul style="list-style-type: none"> Updated Erosion Hazard Assessment with updated erosion and control mitigation measures including undertaken further geotechnical studies prior to construction to obtain further information on soil characteristics to inform final detailed design of the project, and implement measures to direct disturbed runoff away from sensitive catchment areas. The Proponent will engage a Certified Practitioner in Erosions and Sediment Control (CPESC) during construction to prepare erosion and sediment control plans to further reduce the risk of runoff. With the alternate access via Head of the Peel Road now being removed, the Development Footprint on the ridgeline only directly impacts first order ephemeral watercourses, primarily tributaries of the Peel River within the Namoi River catchment. The Transmission Line alignment has also been amended and no longer spans Woodleys Creek. No other second order or higher watercourses are affected by the revised Transmission Line alignment. Mitigation measures as outlined in Section 16.5 of the EIS will be implemented, including preparation of a detailed Soil and water management Plan and progressive Erosion and Sediment Control Plans.
	Disturbance of soil and water based pathogens across site	<ul style="list-style-type: none"> Runoff Management is further address in section 5.2 of the Soil and Water Addendum Report. 	<ul style="list-style-type: none"> Consultation with NPWS regarding sensitive waterways and managing sediment runoff. Further mitigation details are provided in section 5.2.1 of the Soil and Water Addendum. 	<ul style="list-style-type: none"> In order to minimise and mitigate impacts of soil and water based pathogens, a Soil and Water Management Plan will be prepared and implemented, outlining measures for the management and monitoring of surface water quality and hydrology during construction. The plan would also address any requirements for the management of pathogens, pollutants or contaminated lands during construction so as to minimise impacts to terrestrial and aquatic habitats.

Group	Matter raised	Response/Revised Assessment	Consultation Undertaken (consultation addressed in Chapter 4)	Project Change/ Reduced Impact
	Project water consumption	<ul style="list-style-type: none"> Section 16.3.3 of the EIS details four viable water supply options to support the Project's needs without causing disturbance to other users, including water supply from local Council. Other options included extraction from site-based bores or surface water sources. If water is required to be sourced from any bore or surface water source, necessary water licenses will be acquired in consultation with WaterNSW once the preferred option has been determined. 	<ul style="list-style-type: none"> Initial conversations have been conducted with TRC who have advised that water from the project can be purchased from them if there is adequate supply available. 	<ul style="list-style-type: none"> Reduced water consumption is expected due to reduction in earthworks, removed transport routes requiring dust suppression and removal of 5 turbines including reduced access road lengths.
Environmental Impact				
Community Hills Of Gold Preservations Inc (HOGPI)	Mitigation measures to prevent harmful Project wastes feeding into watercourses	<ul style="list-style-type: none"> The Project will not involve waste being discharged to watercourses. A Waste Management Plan (WMP) will be prepared prior to construction that will detail measures to manage, reuse, recycle and safely dispose of waste and will describe the measures to be implemented to manage, reuse, recycle and safely dispose of waste. Updated assessment into environmental impacts associated with soil erosion and sediment into neighbouring waterways is addressed in the Soil and Water section above. Consideration of impacts on waterways was considered in the original S&W Assessment including measures for storage and containment of fuels and chemicals as well as the updated S&W Addendum that details measures to control erosion and sedimentation during construction. 	<ul style="list-style-type: none"> Soil Conservation Services were consulted regarding the Devil's Elbow area and appropriate techniques in design and construction to minimise any sediment entering into nearby watercourses. 	<ul style="list-style-type: none"> Design mitigation measures have been included in section 6 of the Soil and Water Addendum Report in Appendix N of the Amendment Report.
	Land clearing	<ul style="list-style-type: none"> No clearing has been undertaken by the Proponent on the Project Land. The proponent is aware of investigations past and ongoing into the unauthorised land clearing in the vicinity of the Project Land. Investigations have concluded that the Proponent has not been involved in any unauthorised land clearing. Further information is provided in TRC_16. 	<ul style="list-style-type: none"> UHSC and TRC were provided information on background on land clearing. Community Information Hub consultation regarding land clearing. Door knocking discussions regarding what clearing is required for the project. 	<ul style="list-style-type: none"> N/A
	Rehabilitation and decommissioning	<ul style="list-style-type: none"> The Project has an expected operational life of 25-35 years, at the end of which three main options for decommissioning are: <ul style="list-style-type: none"> continue the use of the site as a wind farm using the existing WTGs (subject to condition of equipment); replace the WTGs with technology current at that time and continue the use of the site as a wind farm for a further term (subject to agreement with landowners); or decommission the Project and remove the WTGs and associated infrastructure in accordance with the Environmental Management Strategy. When decommissioning is required key stakeholders including council and local landholders will be consulted. All above ground structures not required for the ongoing agricultural use of the land including the WTGs and substation will be removed and the 	<ul style="list-style-type: none"> Discussion with TRC raised this as a concern. Further information was provided prior to formal response. Community Information Hub discussions regarding the end life of the turbines. 	<ul style="list-style-type: none"> The Project has been reduced from 70 turbines to 65 turbines and other resulting project changes has reduced the Development Footprint from 513 ha to 300 ha. In total 100 ha of permanent footprint for the duration of operating life of the project is expected. As part of the Project, 200 ha of land used for temporary construction which would be further detailed in the project's Biodiversity Management Plan.

Group	Matter raised	Response/Revised Assessment	Consultation Undertaken (consultation addressed in Chapter 4)	Project Change/ Reduced Impact
		<p>land rehabilitated to ensure it can be returned to agricultural use.</p> <ul style="list-style-type: none"> Decommissioning and rehabilitation phase would take up to 18 months to complete. It is expected that decommissioning conditions of consent be included in any project determination. In addition to this the Project has included an obligation to provide landowners with a bank guarantee to cover the cost of removing turbines in the event the Project owner at the time is unable to pay. It should be noted that companies that own wind farm are large stable long-term infrastructure businesses and have the capability to meet their obligations. An example of this is the current project Proponent, ENGIE, at the time of this report is undertaking the decommissioning and rehabilitation of the Hazelwood Power Station in Victoria. 		
	Recycling and replacement	<ul style="list-style-type: none"> WTG manufacturers are ensuring that turbines remain as sustainable as possible. This means that turbines in general are currently 85% recyclable (Vestas, 2021)). With improvements in not only turbine but also recycling technologies, this figure, along with Australian recycling capacity will improve over the lifetime of the Project. The recycling of the turbines will be carried out by the Proponent after decommissioning and will be transferred off site to a recycling plant for processing. This will be included in the Waste Management Plan for the Project. Circumstances may arise where unplanned equipment failure occurs due to environmental events or other factors. The majority of repairs can be undertaken during routine maintenance; however, WTG components requiring replacement would need to be undertaken using a crane in a similar manner to their installation. In addition, replacement of WTGs may occur throughout the operational life of the Project as improved technologies become available. 	<ul style="list-style-type: none"> Consultation emails with information on recycling and replacement sent out to community members. 	<ul style="list-style-type: none"> The reduced size of the Project reduces waste streams and potential for replacement.

Social and Economic

<p>Community Hills Of Gold Preservations Inc (HOGPI) Timor Community (TC) Friends of Kentucky Action Group (FKAG)</p>	<p>Additional information on the financial benefits to stakeholders required</p>	<ul style="list-style-type: none"> There are many rural communities across Australia that have experienced the benefits that renewable energy projects bring. Much of these lessons learnt have been incorporated into guidelines such as the Clean Energy Council's <i>A Guide to Community Benefit Sharing Options for Renewable Energy Projects</i> (2019) (Clean Energy Council , 2019) and the RE-Alliance (formally Australian Wind Alliance) <i>Building Stronger Communities</i> (2019) (RE Alliance , 2019). (These documents have been the basis for the Hills of Gold Community Programs. The benefits from the project range from those hosting turbine infrastructure or providing access to their land for transport to broader community funding programs. The social and economic studies have been updated on expected local economy "value-add" or increase in wages and profit. This is forecast to be \$234 m 	<ul style="list-style-type: none"> Meetings have been held with TRC and UHSC on the governance structure and funding of respective Community Enhancement Funds, to be operating through the Voluntary Planning Agreement signed with each respective Council. 	<ul style="list-style-type: none"> The Project has increased its commitment to each Council area community enhancement fund from \$2,500 per turbine to \$3,000 per turbine. Although the Project layout has been reduced from 70 to 65 WTG's, the Project has committed to a fixed contribution based on the original 70 WTG layout. Based on the updated Project size (and assuming all WTGs proposed are approved and constructed) this equates to an annual fund size of \$165,000 per year in TRC LGA and \$30,000 per year in the UHSC LGA. The Proponent has committed to an additional Construction Funding Community Grants program aimed at community programs during the construction period. Funding of \$150,000 has been committed. The Proponent has committed to opening a shop front during the construction period and staffing this with a local hire to provide information to interested community members. The Proponent has also implemented a voluntary Neighbour Benefit Sharing Program, which enables neighbouring residents who choose to participate to directly share in the financial benefits
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Group	Matter raised	Response/Revised Assessment	Consultation Undertaken (consultation addressed in Chapter 4)	Project Change/ Reduced Impact
		during construction and \$43 m annually thereafter. This includes those not receiving a direct financial benefit such as host landowners, neighbours or those directly employed. It includes the value created to local business in providing goods and services to the project or staff and contractors of the project.		of the Project. Further information on the program can be found in section 4.4 of this report.
	Community objection for the project not being fairly represented	<ul style="list-style-type: none"> This document summarises all submissions and provides responses in a transparent manner. 	<ul style="list-style-type: none"> Further consultation with community organisation including the Nundle Business and Tourism Marketing Group, HOGPI and the TC were undertaken. Updates are provided in the Community Consultation Chapter 4 of this report. 	<ul style="list-style-type: none"> The Project has been refined and amended based on community feedback.
	Insufficient community engagement	<ul style="list-style-type: none"> Extensive public consultation and community engagement has taken place in relation to the Project. The Hills of Gold Wind Farm has received more supportive submissions than any other wind farm in NSW has to date. Of this the majority came from host communities in and around Nundle and Hanging Rock. This level of support demonstrates the engagement undertaken. This report provides an update to consultation undertaken since public exhibition in Chapter 4. Annexure C-2 in the EIS provided a list of community engagement undertaken in the lead up to the submission of the EIS. The Proponent undertook extensive consultation. 	<ul style="list-style-type: none"> A Community Information Hub was set up in the Nundle War Memorial Hall 3 days a week from the 2nd of December 2020 until the 29th of January 2021. A business survey was undertaken based on the feedback and ideas received through consultation to reduce traffic impacts. 67% of businesses in Nundle and Hanging Rock support the project. Support for the project was 90% of business with a physical presence along the transport route demonstrating the effectiveness of community consultation. A stakeholder engagement register records over 400 interactions with key stakeholders in the community. A consultation register has over 200 records of engagement since the start of Public Exhibition. 	<ul style="list-style-type: none"> C7EVEN, a Tamworth based communication consultancy has been engaged to provide improved engagement with the community. The Proponent has issued several media releases, undertaken radio and TV, provided two newsletter updates and updated the website with the latest Frequently Asked Questions since public exhibition. Please see an overview of community consultation undertaken by the Proponent in Chapter 4.
	Job creation data and statistics	<ul style="list-style-type: none"> The forecast Project cost has been updated to reflect the change in Project size from that exhibited in the EIS. The economic opportunities summarised below provides the region with an opportunity to create jobs that support the Tamworth Regional Blueprint 100. 	<ul style="list-style-type: none"> TRC was consulted and further clarification provided to the types of jobs and split of jobs created by the project and those created locally. 	<ul style="list-style-type: none"> The total employment created from the construction and operation of the wind farm is estimated to be: <ul style="list-style-type: none"> 615 Full Time Equivalent (FTE) jobs created across both years of construction phase. 343 FTE jobs in the construction industry 272 FTE jobs in professional, scientific and technical roles associated with the project. Ongoing employment is estimated to increase by 76 ongoing FTE jobs in the professional, scientific and technical industry sector, made up of 28 direct jobs and 48 indirect jobs. Of the 28 direct jobs 16 are expected to be site based and live within local communities. Around 80-85% of the economic benefits will occur in either Tamworth Regional or Newcastle City LGAs.
	Land and property values	<ul style="list-style-type: none"> Two modern studies have been conducted on the effects on property valuation from wind farm developments. The most recent in 2016 was conducted by Urbis and commissioned by the NSW Office of Environment and Heritage. Six case studies were selected across NSW and Victoria with analysis of sales data over 15 years to determine any impact by wind farms on the property sales market. The overall conclusions of this study were that wind farms may not significantly impact rural properties used for Agricultural purposes as there is no direct loss of productivity. From the studies done it can be concluded that land prices are unlikely to be negatively affected. 	<ul style="list-style-type: none"> Consultation emails sent to landowners who are concerned regarding property value. 	<ul style="list-style-type: none"> Generally increases in economic activity in a region leads to increased demand for property and more profit and wages for community members.

Group	Matter raised	Response/Revised Assessment	Consultation Undertaken (consultation addressed in Chapter 4)	Project Change/ Reduced Impact
	Impact to tourism	<ul style="list-style-type: none"> ■ C7even commissioned the University of Newcastle to assess the impacts on tourism industry from wind farms (University of Newcastle , 2021) (refer Appendix H). The assessment states: ■ “A review of the global academic literature on wind farm developments and tourism reveals that, while stakeholders have significant fears of negative impacts, there is little evidence that they come to be. There is very little academic evidence that the presence of wind farms has a significant negative economic impact on the tourism industry in rural localities, but stakeholder concerns about turbine placement, visibility and noise must be taken seriously.” ■ “The only empirical evidence of impacts on the tourism industry appears to be positive; there are a range of studies that demonstrate tourists are not only not deterred from visiting areas with wind farms, but are drawn to them specifically, for a range of reasons. These include interest in technology, infrastructure design, pro-environmental causes, and curiosity. A small but developing body of academic literature on the concepts of ‘energy tourism’ and ‘wind farm tourism’ demonstrate that globally, wind farms attract significant tourism interest. Visits, tours, walking trails, and events can be offered to tourists to enhance the tourism value of a wind farm project. Adventure tourism, eco-tourism and educational tourism incorporating wind farm infrastructure are emerging globally as key opportunities for rural localities.” ■ “Wind farms can be embedded into rural communities offering high tourism value, and educational opportunities for schools and universities in their region.” ■ The Project may bring additional tourism benefits. In Eco Tourism Australia’s Blueprint for a Sustainable Future, it states “Ecotourism is a major economic generator to rural and remote communities, generating greater community benefit and resilience.” With the impacts of the recent droughts, fires and the ongoing COVID-19 pandemic, the Project could provide a boost in the tourism economy of the communities of Nundle and Hanging Rock. ■ Current research suggests wind farms can act as a tourist attraction if they are correctly managed, encouraging people to come to events such as open days would allow an opportunity for people to experience the wind farm as a tourism destination. ■ A number of wind farms across Australia have successfully established popular initiatives and public events that support this research. One example is Woolnorth Tours, set up by Woolnorth wind farm to run educational bus tours through the site. Snowtown wind farm in South Australia hosts a high profile cycling event each year, and also states that 200 local jobs, from a population of 2,000 have been created as a result of the wind farm. 	<ul style="list-style-type: none"> ■ Engagement with local businesses regarding their concerns traffic might have. Engagement with the Nundle Business and Tourism Marketing Group. ■ A survey of local businesses was undertaken and 55 respondents provided their feedback to issues including impacts to tourism. ■ The majority of businesses supported the wind farm. ■ Tourism activities that were considered of interest to existing businesses were: <ul style="list-style-type: none"> – A fun run – Educational tours – A viewing platform – A mountain bike event – Photography competition 	<ul style="list-style-type: none"> ■ To mitigate any potential impacts of construction on tourism, vehicles from the Project will be restricted from parking in the village of Nundle where tourists and locals use local shops and services. ■ A temporary carpark during construction will be established to allow construction workers to still access businesses in the village and contribute to the local economy. ■ A pedestrian crossing will be constructed, subject to approval from TRC, to support improved safe access in the village of Nundle. ■ Additional laybys and road upgrades on Lindsay Gap Road have been proposed to reduce impacts of traffic and leave better infrastructure for existing businesses relying on tourism. ■ Transport of oversized overmass and heavy vehicles has been removed from Jenkins St and any impacts to shop fronts along this strip. ■ Daily trips through Nundle during peak construction have reduced from 502 to 311 trips. 50% of these daily trips are project workers traveling in light vehicles.

Group	Matter raised	Response/Revised Assessment	Consultation Undertaken (consultation addressed in Chapter 4)	Project Change/ Reduced Impact
	Further information required on the Community Enhancement Fund	<ul style="list-style-type: none"> A workshop was held with the Community Consultative Committee in February 2020. A summary of the key ideas for this are provided in the EIS Appendix C.4 Community Enhancement Fund Charter. Funding is proposed for community initiatives surrounding the project and is not proposed for council related activities that should be council funded. The community enhancement fund is additional community funding from council run programs. 	<ul style="list-style-type: none"> Further consultation with UHSC has been undertaken and agreement reached with UHSC on an offer to enter into a Voluntary Planning Agreement. This is available as Appendix G of the Submissions Report. Consultation has been ongoing with TRC staff. All requests by TRC have been accepted and an updated offer was submitted in July 2021. This offer is attached in Appendix G of the Submissions Report. 	<ul style="list-style-type: none"> The Project has increased its commitment to each Council area community enhancement fund from \$2,500 per turbine to \$3,000 per turbine. Despite the reduction in turbine numbers from 70 to 65, the project has committed to fix in its contributions based on the original 70 turbine layout. This equates to an annual fund size of \$165,000 per year in TRC LGA and \$30,000 per year in the UHSC LGA. Changes have been made to the TRC Voluntary Planning Agreement including increased administration fees, an independent chair who is project neutral with a good community standing, and the fund operating independently. The Proponent has committed to an additional Construction Funding Community Grants program aimed at community programs during the construction period. Funding of \$150,000 has been committed.
Heritage				
Community Upper Peel Landcare Group (UPLG) Hills Of Gold Preservations Inc (HOGPI)	Impacts to heritage items around the proposed Devil's Elbow upgrade	<ul style="list-style-type: none"> The Devil's Elbow bypass has been designed to minimise any potential impacts to heritage items. The revised SOHI completed to address the historic heritage impacts of the project on the Black Snake Gold Mine LEP concludes: Construction of the 'Devil's Elbow' proposed transport route upgrade will have no adverse indirect impacts through removal of secondary growth vegetation and minor cut and fill activities on the listed heritage values of Black Snake Gold Mine (LEP I134). 	<ul style="list-style-type: none"> Consultation with TRC on the updated alignment was undertaken and specific issues relating to heritage were discussed including the historic heritage assessment of the listed LEP and request to further assess the residual indirect heritage impacts to the area. An Addendum Statement of Heritage Impact was prepared and provided to TRC. Consultation undertaken by ERM with a local resident experienced in the historic value of the area. Consultation undertaken with the Nundle History Heritage and Research Committee. 	<ul style="list-style-type: none"> The revised SOHI concludes that construction of the 'Devil's Elbow' proposed transport route upgrade will have no adverse indirect impacts through removal of secondary growth vegetation and minor cut and fill activities on the listed item. A 3D visualisation of the Devil's Elbow upgrade presenting the footprint impact relative to the existing Black Snake Mine entrance was presented to TRC.
	Adverse impact of the development on the setting and curtilage of listed heritage items within the Nundle township and surrounds	<ul style="list-style-type: none"> The Project acknowledges the tourism that the Town Heritage and Riverside Walks attract to the town. There have been Project refinements regarding the transport route to ensure that there is no impact to heritage items in the Nundle Township. The Historic Heritage Assessment includes the impact the development has on the areas where road upgrades are required, transmission line infrastructure and the whole wind farm development corridor. The Project was considered to have an impact on three items in the Tamworth LGA. The St Peters Catholic Church and the Nundle Shire Officers were recognised as impacts on the transport route using Head of the Peel Road, however all alternative routes have been withdrawn and hence the insignificant impact has now been avoided. The Project was initially also assessed to potentially have a moderate impact upon a historical archaeological resource associated with its late 19th century gold mining use, most likely mine shafts and tunnels to the Black Snake Gold Mine, located around the Devil's Elbow bypass road. However, after some project refinements, additional assessments have concluded that with mitigation suggested and committed there will be no adverse indirect impacts through removal of secondary growth vegetation and minor cut and fill activities on the listed item. 	<ul style="list-style-type: none"> An updated Statement of Heritage Impact was prepared and provided to TRC. Consultation undertaken by ERM with a local resident experienced in the historic value of the area. Consultation undertaken with the Nundle History Heritage and Research Committee. 	<ul style="list-style-type: none"> Impacts to the St Peters Catholic Church and the Nundle Shire Officers have been avoided through transport route refinement. The revised SOHI concludes that construction of the 'Devil's Elbow' proposed transport route upgrade will have no adverse indirect impacts through removal of secondary growth vegetation and minor cut and fill activities on the listed item

7 PROJECT EVALUATION

Since lodgement of the EIS, the Proponent has continued to consult with community members, community organisations, councils, and relevant government agencies including DPIE and its independent visual technical advisors regarding the Project. This stakeholder engagement has resulted in amendments to the Project, which will materially reduce or avoid impacts of the Project including by:

- reducing the Development Footprint by approximately 41% from 513 ha to 300 ha with a corresponding reduction in biodiversity impacts;
- reducing the native vegetation which is required to be removed to accommodate the Development Footprint by approximately 39% to 133 ha. This represents a total reduction of 75 ha from the Project as described and assessed in the EIS;
- further reducing the extent to which the Project will impact on Koala habitat by 29%;
- avoiding potentially serious and irreversible impacts and/or significant impacts to cave dwelling microbats;
- reducing the visual and aviation night lighting impacts of the Project;
- reducing the traffic and heritage impacts of the Project; and
- preserving access to local goods and services within Nundle and reducing the impacts of Project traffic on residential dwellings within Nundle by the amended Project access.

In addition, the Amendment Report and this Submissions Report also update the mitigation measures proposed for the Project to ensure all remaining impacts of the Project are appropriately managed and mitigated throughout the life cycle of the Project.

As outlined in the EIS and Chapter 2 of the Amendment Report, the Project aligns with international, Commonwealth and NSW Government policy and strategic vision including:

- United Nations Sustainable Development Goals;
- The Commonwealth's Renewable Energy Target;
- Reducing Greenhouse Gas emissions under the Paris Agreement and revised Global and Australian commitments in the current Glasgow COP 26 UN Climate Change Conference;
- Contributing to the National Electricity Market with option for battery firm generation;
- NSW Electricity Strategy;
- NSW Electricity Infrastructure Roadmap;
- NSW Net Zero Plan Stage 1: 2020 – 2030;
- NSW Transmission Infrastructure Strategy;
- NSW New England Renewable Energy Zone;
- NSW Covid-19 Economic Recovery Strategy;
- New England North West Regional Plan;
- Hunter Regional Plan; and
- Tamworth Regional Blueprint 100.

While there are some inevitable impacts associated with all wind farm projects, the impacts associated with the refined and amended Project have been fully assessed and confirmed to be significantly outweighed by the strong public benefits that the Project will deliver. These include:

- generating enough renewable energy to power approximately 182,000 typical homes on an average day. The Project will provide a significant amount of the new generation capacity, which will be required when the 2,000 MW Liddell Power Station located in the NSW Hunter Valley closes in early 2023. Accordingly, the Project will help ensure the security of electricity supply for NSW and help manage the cost of electricity for consumers;
- providing dispatchable energy through the proposed large-scale battery energy storage system of approximately 100MW/400MWh helping to meet peak electricity demands;
- saving 608,000 tonnes carbon emissions per annum and assisting the NSW and Federal Government to meet greenhouse gas targets. In particular, the Federal Government has recently committed to achieving net zero greenhouse gas emissions by 2050. If approved, the Project could be constructed and operational well before the critical global milestone of 2030, assisting NSW and Australia to achieve the 35% reduction by 2030 which is regarded by many as the minimum necessary to contain global warming;
- enabling effective utilisation of the best wind energy resource in the NSW Hunter/New England region;
- material direct investment within the domestic economy with the project representing a capital investment of at least \$332 million and an ongoing operational investment of \$17 million per annum. This direct investment in NSW and the broader region will also bring material benefits to the Tamworth LGA and align with the Tamworth Regional Blueprint 100;
- material employment generation, with the creation of 615 Full Time Equivalent (FTE) jobs through both years of the construction period, and 76 FTE jobs during the operational phase (across professional, scientific and technical industry sector) including 16 ongoing site based jobs for the life time of the project;
- providing a diversified income stream for rural landholders and neighbours through payments to host landholders and the Neighbour Benefit Sharing Program;
- community enhancement funding of \$3,000 per turbine per annum for the operational life of the project, as well as an additional construction sponsorship fund of \$150,000 to support community initiatives during construction; and
- contributing to NSW and Commonwealth renewable energy targets, without depending on the network expansion proposed in the New England area and in alignment with the NSW Electricity Roadmap NSW Electricity Roadmap.

In addition, to further support the local community, if the Project is approved and constructed, ENGIE's energy retailer will offer an exclusive electricity plan to the residents within the Nundle, Hanging Rock & Crawney area. Under this exclusive electricity plan, ENGIE will cover the wholesale cost component of all electricity used by residents within the Nundle, Hanging Rock & Crawney area, enabling them to further benefit from the proximity of the Project by saving on their energy bills.

Site suitability and the environmental, social and economic impacts of the Project have been fully assessed in line with all relevant guidelines, policies and criteria, including in relation to impacts on biodiversity, visual, traffic and transport, noise, aviation, hazards, bushfire, soil and water and heritage. The residual impacts of the Project on each of these issues have been confirmed to be able to be appropriately mitigated or offset by the detailed management measures proposed.

The Project received more supportive submissions than any other wind farm in NSW has to date, with 204 submissions in support received. Of these, the majority came from host communities in and around Nundle and Hanging Rock who provided a total of 122 supporting submissions for the Project. These numbers demonstrate the strong support for the project by the majority of the local community.

Responses provided in this Submissions Report and the Amendment Report demonstrate that potential impacts have been avoided, minimised or mitigated as far as reasonably practicable or feasible.

The amendments made to the Project, as assessed in the Amendment Report and commitments made through responses provided in this Submissions Report materially reduce the overall impacts of the Project. The remaining impacts will be mitigated or offset in accordance with the detailed mitigation measures proposed and the conditions imposed on any development consent granted for the Project.

This Submission Report, and the Amendment Report confirm the benefits of the Project and related impacts and it is considered that the Project is in the public interest.

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APPENDIX A SUBMISSIONS REGISTER

Table A-1: Agency / Organisation Submissions

Stakeholder Type	Name	Position
Government Agency	DPIE Biodiversity and Conservation Division	Comments
Government Agency	DPIE Water and the Natural Resources Access Regulator (NRAR)	Comments
Government Agency	NSW Environment Protection Authority	Comments
Government Agency	Transport for NSW, Roads and Maritime Services Division	Comments
Government Agency	WaterNSW	Comments
Government Agency	Crown Lands	Comments
Government Agency	Department of Defence	Comments
Government Agency	Department of Primary Industries, Agriculture Land Use Planning Division	Comments
Government Agency	Department of Primary Industries, Fisheries NSW	Comments
Government Agency	Heritage NSW	Comments
Government Agency	National Parks and Wildlife Service	Comments
Government Agency	NSW Department of Regional NSW, Mining, Exploration & Geoscience Division	Supports
Government Agency	Transport for NSW	Comments
Government Agency	Rural Fire Service	Comments
Government Agency	Airservices Australia	Comments
Government Agency	Civil Aviation Safety Authority	Comments
Government Agency	Forestry Corporation of NSW	Supports
Government Agency	Muswellbrook Shire Council	Objects
Government Agency	Cessnock City Council	Comments
Government Agency	City of Newcastle	Comments
Government Agency	Tamworth Regional Council	Objects
Government Agency	Upper Hunter Shire Council	Comments
Organisation	Australasian Cave and Karst Management Association	Objects
Organisation	Newcastle and Hunter Valley Speleological Society	Objects
Organisation	Volunteer Organisation PTSD Care	Objects
Organisation	Friends of Kentucky Action Group	Objects
Organisation	Timor Community	Objects
Organisation	RE-Alliance	Supports
Organisation	Tamworth Regional Residents and Ratepayers Association	Comments
Organisation	Hills of Gold Preservation Inc.	Objects
Organisation	Ryde Gladesville Climate Change Action Group	Supports
Organisation	Upper Peel Landcare Group	Objects
Organisation	Yass Landscape Guardians	Objects

APPENDIX B RESPONSE TO ORGANISATION AND COMMUNITY SUBMISSIONS

APPENDIX C STAKEHOLDER ENGAGEMENT REGISTER AND MATERIALS

APPENDIX D SCHEDULE OF ROAD UPGRADES

APPENDIX E CAPITAL INVESTMENT VALUE RESPONSE LETTER

APPENDIX F SOCIO ECONOMIC RESPONSE LETTER

APPENDIX G COUNCIL LETTERS OF OFFER

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