

All previous objections to the proposal are still valid as most of the issues I described in my objection have not been addressed and resolved, by the proponent

I am once again, objecting to the proposed Hills of Gold windfarm (SSD -9679) this is a large industrial development, perched in the ridgeline of the Great Dividing Range. Engie, in their original EIS, continually promoted this development as in line with the New England Renewable Energy Zone (REZ) – even though the site is not part of that region.

After reading through the original application documents, the EIS, the Response to Submissions and the recent Amendment to the Application, it is clear that the proponents still have not carried out many essential assessments pertaining to the project site. The proponents have failed to provide proper assessments of the project impact on soil, water, location suitability, transport, and impacts on community.

Lack of Community consultation with Timor/ Crawney residents on the new proposal

There has been very little consultation with the Timor/Crawney communities throughout the application process. In fact, our communities were not mentioned in the original EIS and many residents were not even listed as living, there

And with the new proposal to use Crawney Road for access, again, neither Engie nor the UHSC has contacted any residents from this over 100 km stretch of roads on both the Gundy and the Timor routes as part of this assessment

The community found out about the proposal, through the Hills of Gold Preservation, INC, not the proponent. Many of the community are unaware of the new proposal to access the windfarm site via Crawney Rd. The Amendment Report, released in November, 2022, gives very little time for residents to voice their concerns. The response is due before December 13, 2022

Unsuitable location and access to the windfarm site

There is no Australian standard mapping practice used to provide risk or suitability information on this Project

The proponent cannot, yet, find a road with the capabilities or suitability to access the Project. This is the proponents third attempt to find road access to the windfarm site. The proponent has abandoned the two previous access sites as the roads are unsuitable for moving related turbine infrastructure, articulated trucks and cranes. A proper assessment of the location's suitability would have revealed this problem. In this Amendment, there are no details on the Western Connector Road which will transverse from the new Crawney Road optional route to the ridgeline. There is no engineering report, soil and water report and no environmental impact cost

All 3 Options routes, however, should be rejected for the Over sized/Over Mass Vehicles access through areas that are known to have high impact to Box Gum Woodland, TECs - which is listed as a Critically Endangered Ecological Community - and to the Nationally Listed Threatened Booroolong Frog.

The new proposal described in the Amendment Report is more unsuitable than the previous two, for several reasons

1 Crawney/ Timor Rd is predominately a single lane carriageway, both the 31kms of bitumen and thekms of dirt through Crawney Pass. This single lane road across the Pass, winds through steep mountainous country, the edge of the road dropping steeply to the valley

floor. The proposed access road from Crawney Road to the development site, at Teamsters Rest, rises on a very steep grade. Some of the slopes on the southern side of the range, reach a gradient of 50%. MAJOR road works would need to be carried out to widen and straighten the road. Even the 31kms Timor Rd would require major upgrades. This is logistically and financially unviable.

2 The Crawney Pass State Forest would require extensive clearing for road infrastructure, adding to further destruction of the wildlife corridor

3 The limestone mine at Timor uses Crawney and Timor roads to transport product from the mine on a daily basis. Add the increased trucks and employee vehicles relating to the windfarm and there is a recipe for disaster. Keep in mind that this road is predominately a single line and residents have to pull off the road, at times, to avoid the 50 ton capacity, mine trucks. The new proposed access via Crawney Road is totally unsuitable and dangerous to road users

Impact on flora and Fauna

Sadly, the EIS assessments of flora and fauna was carried out after extensive ridgetop clearing

The amendment application proposes an increase in the project area impact, from 8315 ha in the EIS to 8732 ha in this Report. There is a proposed increase in Development Footprint from 300ha in Report 1 to 447 ha in this Report 2. Also, the Amendment Report proposes a widening of the Transmission Line route easement to from 60 m to 90m between the current and new substation locations. The project area will require 40 kms of road network

The required clearing that will severely impact 17 Plant communities; 2 State

–Listed Threatened Ecological Communities; 2 Nationally-listed Critically

Endangered Ecological Communities; 10 State –listed BAM (Biodiversity

Assessment Method 2020) species credit species; 5 Nationally –listed threatened fauna

Engie's Project that knowingly will destroy koala habitat. Tamworth Regional Landcare is creating 45 ha of new koala habitat in Gunnedah, while Engie's HOG Wind Farm will be clearing 46.2 ha of

Koala habitat as part of this project. Koalas are now an officially endangered species. NSW Government states that if we don't stop clearing their habitat, the koala is at high risk of extinction by 2050.

The NSW Government needs to make the responsible decision for our environment by rejecting Engie's Hills of Gold wind farm proposal on the basis that the site is highly unsuitable and the amount of preparation of the site, highly destructive

Proposed Changes to turbine location

In February 2022 NPWS requested the removal of all turbines bordering Ben Halls Gap National Reserve. Engie has removed 1 WTG (41) and retained the 11 still bordering the BHGMR

The proponent now seeks approval to relocate any and all turbines up to a 100 metre radius. If this change is approved, then wind turbines can be moved closer to the national park boundary. While evidence of the impacts of windfarm blades on wildlife is well documented, grouping turbines will certainly increase flight risk to native birds and microbats. In March 2021, the Upper Hunter Shire Council (UHSC) requested the removal of WTG 31, 32 and 33 as the turbine positions were in breach of their DCP. These turbines were under the specified distance a from a boundary.

If these requests are approved, the turbines could be placed closer to the Ben Hall National Park

Lack of assessments and mitigation plans

Soil and water assessments

There is no assessment of soil quality and impacts of forest clearing on water movement on the southern side of the range. Hence, as with the Amendment there is no mitigation plan to reduce pollution of waterways for the southern side of the ranges. There is a lack of assessment of the effects of soil disturbance and river movement on the Karst system

None of Engie's previous reports on the wind farm Project has taken any account of site specific snow and rainfall volume and velocity received within the Project area –contributing to the saturation of the soil (and subsequent slow release of water by springs); potential mass movement and run off and sedimentation of the river systems. These schedule 8 soil types are extremely unstable. Heavy rainfall has traditionally lead to landslips on the steep sides of the ranges. No mention has been made of wash down area and sterilisation facility between catchments and sensitive areas

There is no information provided in all documents relating to where water will be sourced for turbine construction.

There are no accurate geotechnical surveys and no Soil and Water Management Plan (SWMP)

There is No comprehensive Water Cycle Strategy (CWCS) provided

There is no Australian standard mapping practice has been used to provide risk or suitability information on this Project

There is no map based on soil profiles and fieldwork, nor any relevant soil laboratory data presented. No attempt has been made to do a soil survey

Rehabilitation Plan

The proposal reflects a minimal rehabilitation plan -Engie will take responsibility for removal of "...below ground infrastructure, including the WTG foundations and hardstands to a depth less than 500mm. No rehabilitation to its former tall forested environment could ever occur with a tree root possible depth of less than 50 cm.

There are many more concerns than there are resolutions. The project has too many problems that are unable to be resolved and therefore the project should not be approved

Regards

KERRY WEAVER
SANDRA WEAVER

Kerry Weaver
S. Weaver

930 CRAWNEY RD.
TIMOR 2338

SRLF CFCP 462

11. 12. 22 09h26



DIRECTOR-ENERGY ASSESSMENTS
DEVELOPMENT ASSESSMENT

DEPARTMENT of PLANNING ~~AND~~ ENVIRONMENT
4PSC MAIL ROOM

LOCKED BAG 5022

PARRAMATTA N.S.W. 2124

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DEPARTMENT OF
PLANNING, INDUSTRY
AND ENVIRONMENT

