

Ref: Hills of Gold Wind Farm Amended Application (SSD-9679)

Submission to NSW Government Major Projects

[NAME WITHHELD]

13 December 2022

Hills of Gold Wind Farm

I object to the Engie Hills of Gold Wind Farm application. My objections are applicable to the original EIS and this Amendment Report of November 2022.

I wish to remain anonymous in my submissions.

I acknowledge and accept the NSW Department of Planning and Environment's disclaimer and declaration.

I confirm that I have not made a reportable political donation.

My objections are set out below:

Location of the Site

The proposed site:

- Threatens the connectivity corridor for threatened species;
- Consists of steep slopes on the southern side (the Crawney and Timor Communities side) of the Development that reach over 50% gradient in sections and have a high risk of erosion and dispersion (landslides) which have recently occurred on the Crawney Pass Road;
- Will involve clearing 447ha of vegetation with profound ecological consequences; and
- Is comprised of soils that are of a Class 7/8 which are

categorised as “extremely low capability land; limitations are so severe that the land is incapable of sustaining any land use apart from nature conservation. There should be no disturbance of native vegetation. Class 8 land includes precipitous slopes (greater than 50%) and cliffs, areas with a large proportion of rock outcrop or areas subject to regular inundation and waterlogging”.

The proposed site sits on top of the ridgeline of the Liverpool Ranges, with elevations of 1100m-1400m. This will create a visual eyesore for all surrounding properties and is undesirable for landholders in the area.

**Transport Routes
for Oversize
Vehicles**

The 3 Options are either on Crown Land Reserves, reserved for Travelling Stock Routes OR are subject to the Gomeroi Native Claim Title Claim and an Aboriginal Land Claim, both currently undetermined. The land is zoned Environmental Conservation under the Tamworth Local Environment Plan (LEP).

Table 6-2 on page 16 shows all Options have unacceptably High impact on Threatened Ecological Communities (TECs) and on a Nationally listed threatened fauna species - the Booroolong Frog - and all 3 Options should be immediately rejected.

The road surfaces on these local roads, much unsealed, are in poor conditions and even the tarred sections are eroded and degraded on the edges and deeply potholed. Safety is therefore a high concern.

Koala Habitat

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.

**Environmental
Impact and
Threatened
Ecological Species**

Engie's HOG Wind Farm Project Area sits on the boundaries of the Crawney Pass National Park, the Ben Halls Gap Nature Reserve (BHGNR) and the Ben Halls Gap State Forest.

The Crawney Park NP itself is part of a wider network of conservation reserves located on the Liverpool Range (of the Great Dividing Range) that includes Coolah Tops, Murrurundi Pass and Towarri NPs and Ben Halls Gap, Cedar Brush, Wallabadah and Wingen Maid Nature Reserves.

These all form part of a regional corridor providing habitat connectivity along the Liverpool range and is also located within the broader Great

Eastern Ranges Initiative conservation corridor.

Engie is not creating any wildlife corridor –the HOG Wind Farm would be demolishing the existing corridor that already exists

Soils

None of Engie's reports on the WTG siting 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.

Dr Robert Banks is a certified soil scientist, and his report has made the following findings:

- No engineering or soil tests to justify the Updated Mitigation Measures on pages 23-24 of Engie's Soil and Water Addendum Report;
- No mention of keeping soil pathogens separate from separate catchments;
- No mention has been made of wash down area and sterilisation facility between catchments and sensitive areas;
- No Soil and Water Management Plan (SWMP) has been provided;
- No Comprehensive Water Cycle Strategy (CWCS) has been provided;
- Geotechnical information is vague, misleading, poorly referenced and poorly geo-informed;
- No Australian standard mapping practice has been used to provide risk or suitability information on this Project;
- No map based on soil profiles and fieldwork, nor any relevant soil laboratory data are presented;
- No mapped landslides – they are simply mentioned as occurring on "the western portion";
- No attempt has been made to look for landslips under the Development Footprint and along the whole route of the proposed roads;
- No attempt has been made to do a soil survey; and
- No soil profiles have been done as per the relevant Australian Standards for soil surveys.

Bushfire Risk

Aerial fire fighting is still seriously compromised under the HOG Wind Farm project. Aerial fire fighting remains at the pilot's discretion of perceived safety – the most reliable and highest water sources and landing area are unavailable due the siting of infrastructure.
