



Hills of Gold Wind Farm Pty Ltd



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Development Management by:



Hills of Gold Wind Farm

Submissions Report No. 2

28 February 2023

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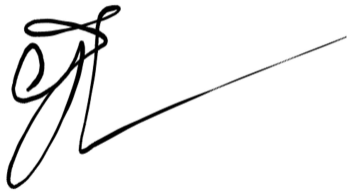
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Hills of Gold Wind Farm

Submissions Report No. 2



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Acronyms and Abbreviations

Name	Description
AGL	Above Ground Level
ANZEC	Australian and New Zealand Environment Council
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
CASA	Civil Aviation Safety Authority
CCC	Community Consultative Committee
DPIE	NSW Department of Planning, Industry and Environment
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
HNSW	Heritage NSW
km	Kilometre
kV	Kilovolt
LGA	Local Government Area
LPSC	Liverpool Plains Shire Council
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
PCTs	Plant community type
POEO Act	Protection of the Environment Operations Act 1997
RFS	NSW Rural Fire Service
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
WTG	Wind turbine generators

1. INTRODUCTION

1.1 Background

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 (SSD-9679), an Environmental Impact Statement (EIS) (ERM, 2020) was prepared for the Project in accordance with the requirements of *Environmental Planning and Assessment Regulation 2000* (EP&A Regulation). The EIS was publicly exhibited between 2 December 2020 and 29 January 2021 by the former 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).

The Proponent prepared a Submissions Report (ERM, 2021) (Submissions Report No. 1) which responded to the issues raised in agency, organisation, and community submissions. An Amendment Report (Amendment Report No. 1) (ERM, Jan 2022) was also prepared to refine and amend the Project following this feedback from the initial public exhibition and additional agency and community consultation.

Following submission of the Amendment Report No. 1, further feedback was received from Tamworth Regional Council, Biodiversity Conservation and Science Directorate and the DPIE. In November 2022, the Proponent prepared a second Amendment Report (ERM, Nov 2022) (Amendment Report No. 2) to further refine and amendment the Project to address this feedback and is summarised below:

- alternate transport route options to avoid Devils Elbow and significant upgrades to Tamworth Council Road networks including Morrisons Gap Road and Barry Road;
- removal of wind turbine generator (WTG) 41 and the relocation of 20 turbines to avoid Serious and Irreversible Impacts (SII) to biodiversity;
- amended access track locations;
- inclusion of towers for the transmission line to provide optionality and potential for further biodiversity avoidance in detailed design;
- additional transmission line easement to facilitate alternate substation location options;
- increase in the size of the switching station footprint from 2 hectares (ha) to 4 ha;
- optionality for substation, battery energy storage system (BESS) location; and
- optional expansion of an existing Forestry Corporation of NSW (FCNSW) quarry within the Hanging Rock State Forest to source local materials and reduce construction traffic through Nundle.

The Amendment Report No. 2 was publicly exhibited from 16 November 2022 until 13 December 2022 (28 days).

A total of 437 submissions on the Project were received (excluding duplicates). These submissions were received from government agencies, organisations and members of the public broken down as follows:

- 410 public submissions;
- 10 organisation submissions; and
- 17 public authority submissions.

This Submissions Report has been prepared to respond to the issues raised in the agency advice and organisation and public submissions, and has been prepared in accordance with *State Significant Development Guidelines – Preparing a Submission Report, Appendix C to the State Significant Development Guidelines* (DPIE, 2021).

This Submissions Report should be read in conjunction with the Amendment Report No. 2, available on the Major Projects portal: [Hills of Gold Wind Farm | Major Projects Planning Portal](#).

The Submissions Report also provides further details of on-going stakeholder engagement activities that have been undertaken since the Submissions Report No. 1, including both agency and community engagement activities.

Following receipt of this Submissions Report, DPE will complete its assessment of the Project and prepare an assessment report, taking into consideration the EIS, Amendment Report No. 1, Submissions Report No. 1, Amendment Report No. 2, this Submissions Report, and associated additional assessments, as well as submissions made during the public exhibition period. DPE's assessment report, the Project documents, and the submissions will be considered by the Independent Planning Commission (IPC) prior to the determination of the development application.

1.2 Project Overview

The Project involves the construction, operation and commissioning of a wind farm with up to 64 wind turbine generators (WTG), together with associated and ancillary infrastructure.

The Project layout is illustrated in Figure 1-2.

The Project has been revised following exhibition of the EIS and subsequent Amendment Reports, in response to the outcomes of community consultation, regulatory and community submissions, engagement and ongoing design, and constructability assessments.

The Project consists of the following key components:

- up to 64 WTGs, each with:
 - a generating capacity of approximately 6 megawatt (MW);
 - three blades mounted to a rotor hub on a tubular steel tower, with a combined height of blade and tower limited to a maximum tip height of 230 m above ground level (AGL);
 - a gearbox and generator assembly housed in a nacelle; and
 - adjacent hardstands for use as crane pads and assembly and laydown areas.
- decommissioning of three current monitoring masts and installation of up to 10 new monitoring masts for power testing (comprising the up to five previously proposed in the EIS and an additional five now proposed). Five of the new monitoring masts would be located close to a WTG location and five would be placed on the same location as a WTG prior to its installation and removed shortly before WTG installation. They would have a maximum height of approximately 150 m AGL, approximately equivalent to the hub height of the installed WTGs. The exact number and locations of the monitoring masts would be defined at the detailed design stage. These masts assist in verifying the performance of the WTGs during operation of the Project;

- a 330 kV electrical substation, including transformers, insulators, switchyard and other ancillary equipment located between WTGs 20 and 26 or with an option north west of WTG 5 and 6;
- an operations and maintenance facility located either adjacent to the BESS / substation, or within the compound area between WTGs 55 and 56;
- a BESS of approximately 100 MW/400 megawatt-hour (MWh) (4 hours of storage of 100 MW of power) adjacent to the substation;
- aboveground and underground 33 kV electrical reticulation and fibre optic cabling connecting the WTGs to the onsite substation (following site access tracks where practicable) (connection lines);
- a 330 kV single circuit twin conductor overhead transmission line (transmission line) to connect the onsite substation to the existing 330 kilovolt (kV) TransGrid Liddell to Tamworth overhead transmission line network, located approximately 24 kilometres (km) west of the substation (based on existing substation location). The eastern section of the transmission line may include multiple 33 kV overhead circuits subject to the final internal substation location that is selected;
- a switching station to connect the Project to the 330 kV TransGrid Liddell to Tamworth line and enable the Project to connect to the grid. The switching station would also be located approximately 24 km west of the substation, or approximately 13.5 km from the WTG Project Area (based on existing substation location);
- an internal private access road network (combined total length of approximately 40 km) connecting the WTGs and other Project infrastructure to the public road network; and
- upgrades to local roads and crossings required for the delivery, installation and maintenance of WTG components and associated materials and structures.

The following temporary elements would be required during construction of the Project:

- temporary site buildings and facilities for construction contractors / equipment, including two construction compounds, site offices, car parking and amenities for the construction workforce;
- two temporary concrete batching plants to supply concrete for WTG footings and substation construction works, with the option to use any construction laydown area with the exception of the laydown areas along transport route proposed;
- optional expansion of an existing FCNSW quarry within the Hanging Rock State Forest;
- earthworks for access roads, WTG platforms and foundations, potentially including controlled blasting in certain areas;
- potentially rock crushing facilities on-site for the generation of suitable aggregates for concrete batching and/or sized rock for access road and hardstand construction;
- up to seven laydown areas for the temporary storage of construction materials, plant, and equipment construction;
- external water supply for concrete batching and construction activities;
- the transport, storage and handling of fuels, oils and other hazardous materials for construction and operation of wind farm infrastructure; and
- beneficial reuse of materials won from the development footprint during cut and fill and WTG foundation excavation for use in roads, hardstands and foundation material.

The Project also includes the subdivision of land:

- to create two new lots for:
 - the substation, Operations & Maintenance (O&M) facility and battery storage; and
 - the switchyard; and

- any deemed subdivision, including subdivision for lease purposes, arising from the grant of leases for any other Project infrastructure components including turbines and the substation.

The proposed lots the subject of the subdivision remain subject to further detailed design and discussions with the relevant landholder and TransGrid.

The key Project components including project updates (Section 1.3) are described in the Updated Project Description (refer Appendix A).

1.3 Updated Project Description

Since the lodgement of the Amendment Report No. 2, the following Project updates have been made by the Proponent:

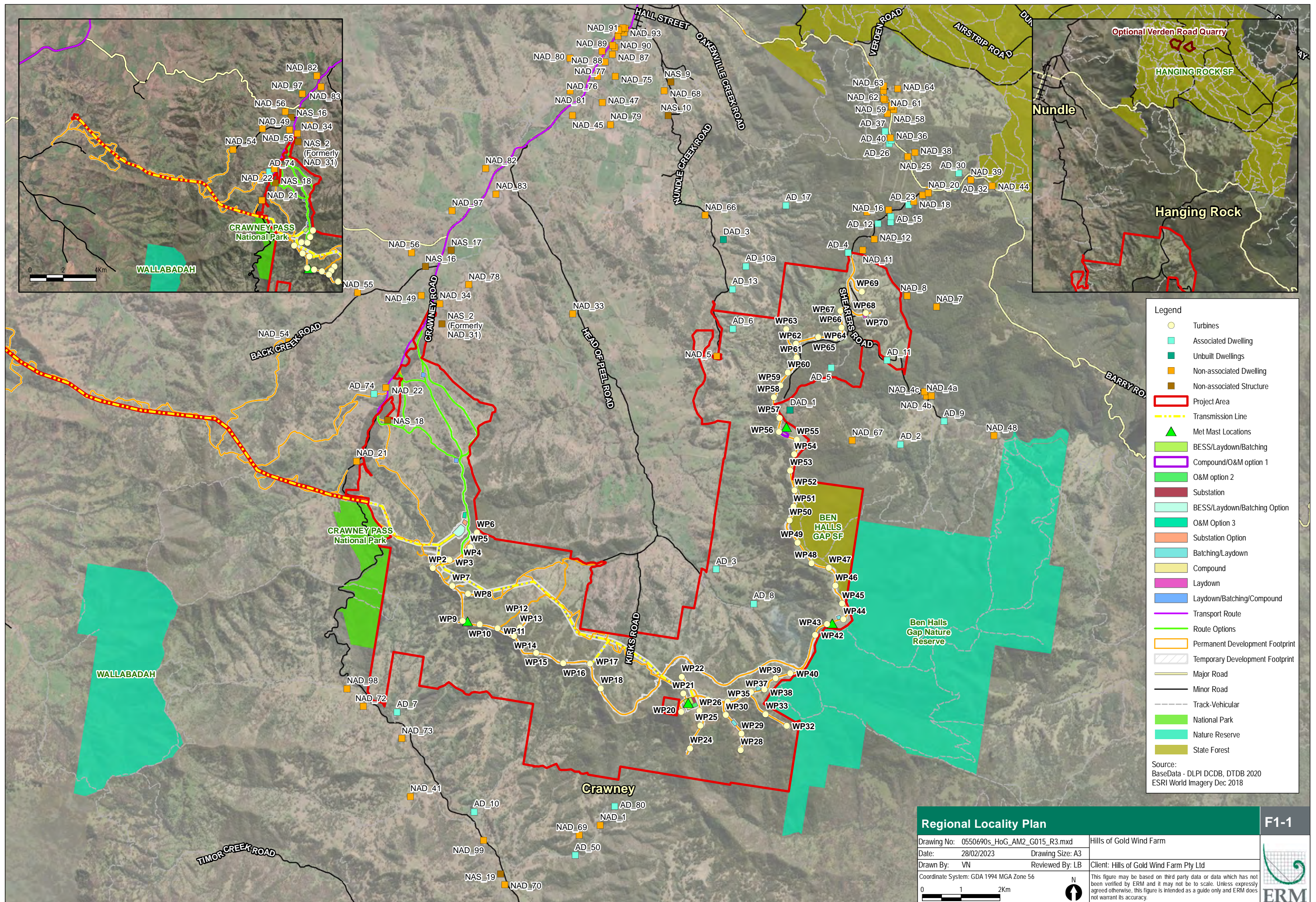
- Oversize Overmass (OSOM) Route 2 – Nundle Bypass:
 - In the Amendment Report No. 2, this route was envisaged to only be used for OSOM vehicles. The Proponent is now proposing optionality for east bound heavy vehicles travelling to the western Project entrance off Crawney Road to use this route to avoid the centre of the Nundle township (refer Figure 1-3). Further details would be provided in a Traffic Management Plan after project approval, and following selection of turbine technology, engagement of construction contractors, detailed design of the Project, and consultation with road authorities, including Tamworth Regional Council.
 - Further definition has been provided to the proposed intersection upgrade and required widening of the corner of Oakenville and Herron Street and Innes and Jenkins Street, with consideration for the types of vehicles and loads proposed to be using this route. The general arrangement of the intersection upgrade is provided in Figure 1-4 below. Detailed engineering plans are annexed to Appendix B 'Traffic and Transport Assessment Addendum 3'.
- additional hardstand area:
 - An additional hardstand area is also being proposed on the western side of Herron Street to provide a waiting bay when OSOM vehicles are using Route 2 (see indicative location in Figure 1-4).
- additional Lot and swept path on Lot 1 DP 784322 in Muswellbrook Shire LGA:
 - Progress with the landowner on this lot has been made which would avoid use of Lot 1 DP 999525 and Lot 1 DP 1137094. This provides an alternate swept path for blades to travel through.
- a Neighbour Agreement has been signed with a single landowner with a dwelling on Lot 181, DP750922 and dwelling entitlements on Lots 52, 182 and 195 of DP 750922. The landowner has agreed with the visual impacts that the Project would create on the dwelling and the lots with dwelling entitlements.

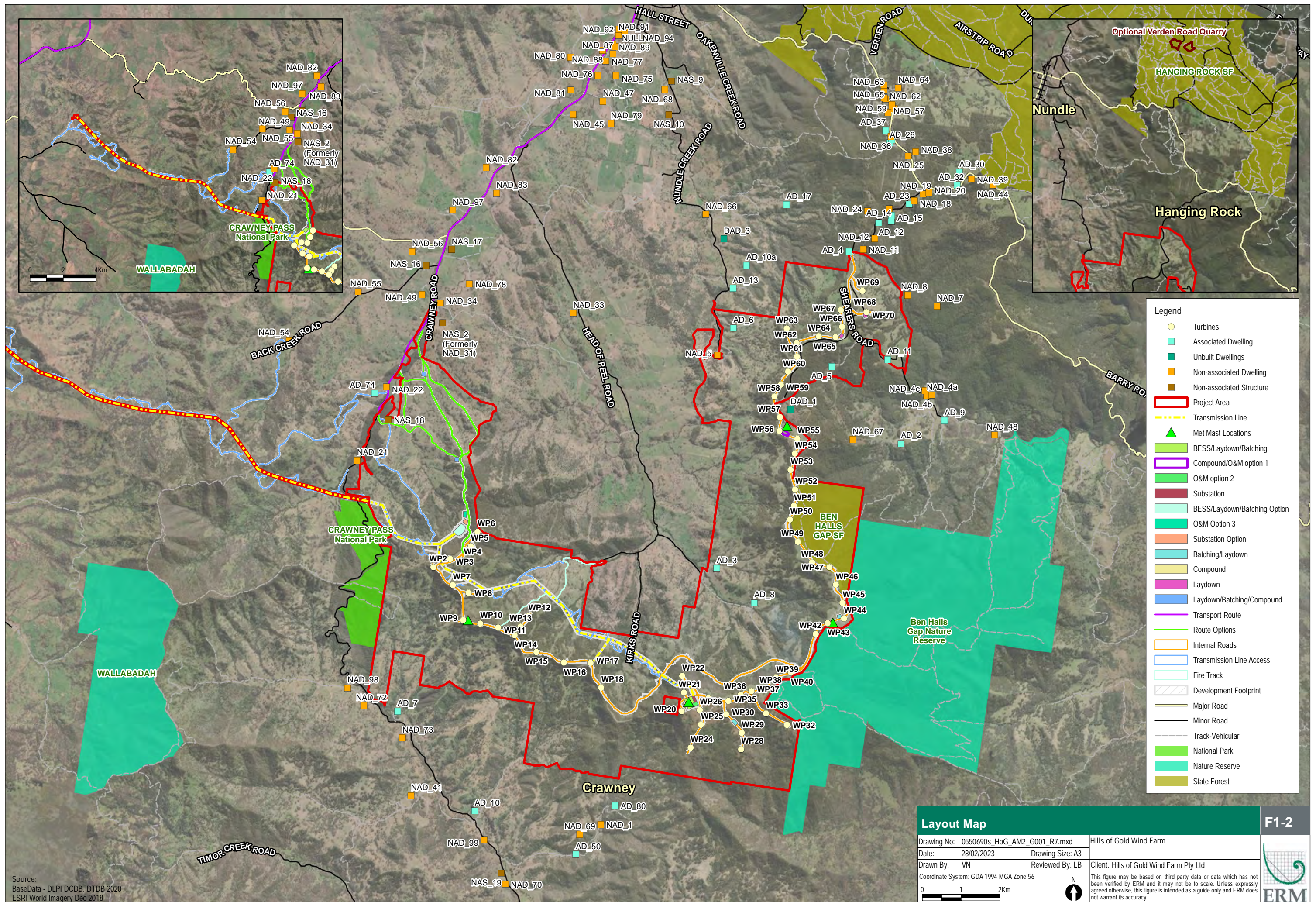
1.4 Updated Assessments

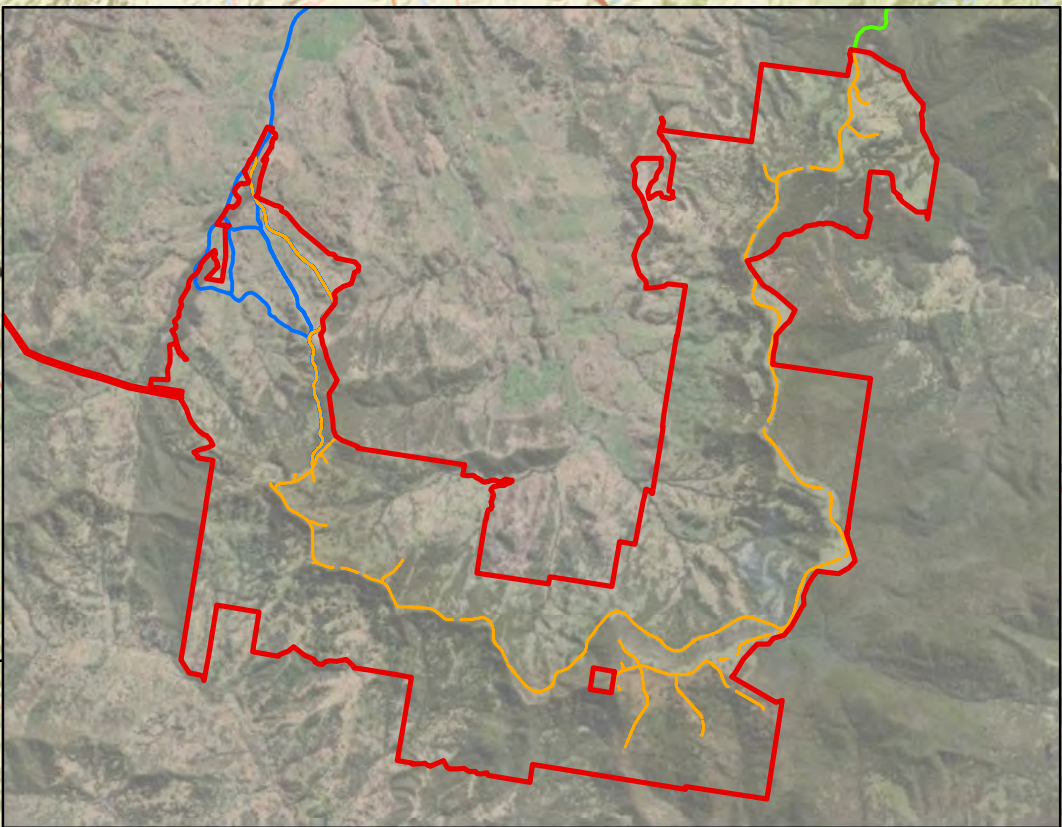
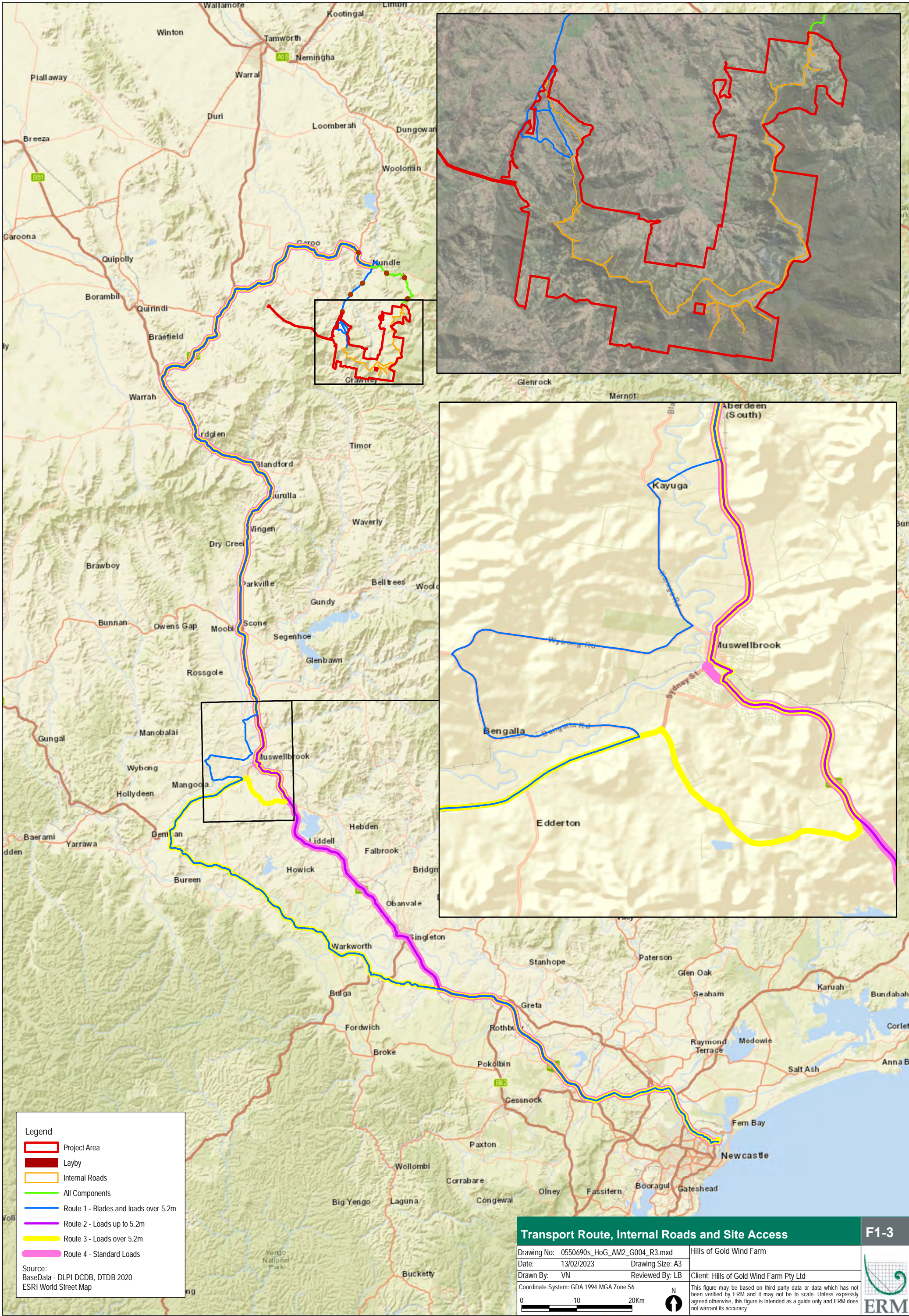
Further assessment has been prepared to address the updated project design and matters raised as follows:

- an Addendum 3 to the Traffic and Transport Assessment has been prepared by the Transport Planning Partnership (TPPP), in a letter dated 1 February 2023 (refer Appendix C). This letter assessment has been prepared to respond to matters raised in the Transport for NSW submission dated 14 December 2022, and includes:
 - additional traffic management measures;

- updated traffic assessment for Herron Street and Innes Street based on the revised routes and 'worst case' scenario;
- additional swept paths relating to the proposed hardstand at the intersections along Herron Street and Innes Street; and a
- a concept plan for the Basic Auxiliary Right (BAR) turn treatment.
- a letter by Australian Resource Development Group (ARDG) (refer Appendix D) to address matters raised by the DPE Water submission dated 9 December 2022 relating to the potential for the optional FCNSW quarry expansion to intersect a groundwater aquifer;
- a Technical Note has been prepared by Biosis, dated 24 January 2023 (refer Appendix E) to address matters raised by the Department of Primary Industries, and includes:
 - an assessment of potential impacts to Eel Tailed Catfish (*Tandanus tandanus*) and Southern Purple Spotted Gudgeon (*Gudgeon Mogurnda adspersa*);
 - an assessment of potential additional biodiversity impacts as a result of the transport route amendments (refer Section 1.3).
- an Updated Biodiversity Development Assessment Report (BDAR) (refer Appendix F) to address matters raised by the DPE – Biodiversity Conservation and Science Directorate relating to vegetation integrity scores and credit requirements under the Biodiversity Assessment Method (BAM).





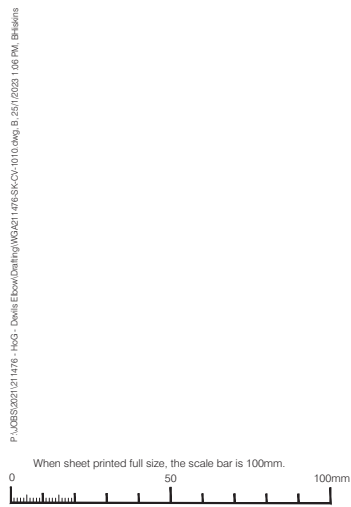




- NOTE:**
1. ALL DIMENSIONS IN METRES UNLESS NOTED OTHERWISE.
 2. ALL COORDINATES ARE TO MGA2020, ZONE 56.
 3. ALL LEVELS TO AUSTRALIAN HEIGHT DATUM (AHD).


- LEGEND**
- /---/--- EXISTING FENCES
 - - - - - EDGE OF EXISTING SEAL
 - - - - - ROAD CENTRELINE
 - — — — — EDGE OF ROAD
 - - - - - EDGE OF TRACK
 - [Orange Box] EXTENT OF ROAD WIDENING
 - [Yellow Box] MINIMUM EXTENT OF TEMPORARY TRACK
 - [Brown Box] OPTIONAL TEMPORARY LAYBY

GENERAL ARRANGEMENT
SCALE 1:1000



INFORMATION/ISSUE
NOT FOR CONSTRUCTION

REV.	DATE	DESCRIPTION	DRAFT	ENG.	CHKD.
A	13.01.2023	ISSUED FOR INFORMATION	EN	JB	JB
B	25.01.2023	ISSUED FOR INFORMATION	EN	JB	JB



HILLS OF GOLD
EXTERNAL WORKS
OAKENVILLE TO JENKINS
GENERAL ARRANGEMENT

A1 DOCUMENT NUMBER
Project Number Sheet No. Rev.
Design Drawn
EN EN WGA211476-SK-CV-1010 B

Intersection Upgrade General Arrangement

Drawing No.: 0550690s_RIS_I009_R0.ai
Date: 27/06/2022
Drawn by: VN


Hills of Gold Wind Farm

Drawing Size: A3
Reviewed by: LB

Client: Hills of Gold Wind Farm Pty Ltd

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. ANALYSIS OF SUBMISSIONS

2.1 Number of Submissions

A total of 437 submissions on the Project were received from Government agencies, organisations and members of the public during the public exhibition period. The submissions are available on DPE's Major Projects website and are broken down as follows:

- 410 public submissions (excluding duplicates);
- 10 community organisation submissions; and
- 17 Public Authority submissions.

An additional 58 submissions were received after the formal exhibition period and matters raised in those submissions have been taken into account in this Submissions Report. All submissions received have been recorded in the Submissions Register (refer Appendix G).

A breakdown of the submissions by type (support, object, comment) is detailed in Table 2-1.

Table 2-1 Breakdown of Submissions Received

Type	Object	Support	Comment	Total
Public Authority	2	0	15	17
Public	264	146	-	410
Community Organisation	9	1	-	10
Total	275	147	15	437

A total of 10 submissions were received from the following community organisations:

- Newcastle and Hunter Valley Speleological Society;
- The Uarbry Tongy Lane Alliance Inc;
- Save Our Surroundings;
- Care To The All Inc.;
- Hills of Gold Preservation Inc.;
- The Upper Peel Landcare Group;
- Nundle Business Tourism and Marketing Group Inc;
- The Nundle Pony Club;
- Concerned Citizens of Crawney and Timor; and
- Nundle Sport & Recreation Club.

A submission was received from the Tamworth Regional Residents and Ratepayers Association however this submission was in response to the proposed Dungowan Dam (SSI-10046) and did not relate to the Hills of Gold Wind Farm.

A total of 17 public authority comments and submissions were received from:

- DPE Water;
- DPE – Biodiversity Conservation and Science Directorate (BCS);
- NSW Environment Protection Authority (EPA);
- Department of Primary Industries – Agriculture (DPI Agriculture);
- Department of Primary Industries – Fisheries NSW (DPI Fisheries);
- Heritage NSW (HNSW);
- NSW Department of Regional NSW – Mining, Exploration & Geoscience (MEG);
- WaterNSW;
- Transport for NSW (TfNSW);
- Crown Lands;
- Airservices Australia;
- Civil Aviation Safety Authority (CASA);
- NSW Fire and Rescue (FRNSW);
- City of Newcastle;
- Muswellbrook Shire Council;
- Tamworth Regional Council; and
- Upper Hunter Shire Council.

2.2 Geographic Analysis

A total of 410 unique public submissions were received from residents located across 46 NSW LGAs and five interstate LGAs within the formal exhibition period. The majority (278, 66%) 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 28 (6.6%) submissions received from Upper Hunter LGA, and 3 (<1%) submissions received from Liverpool Plains LGA.

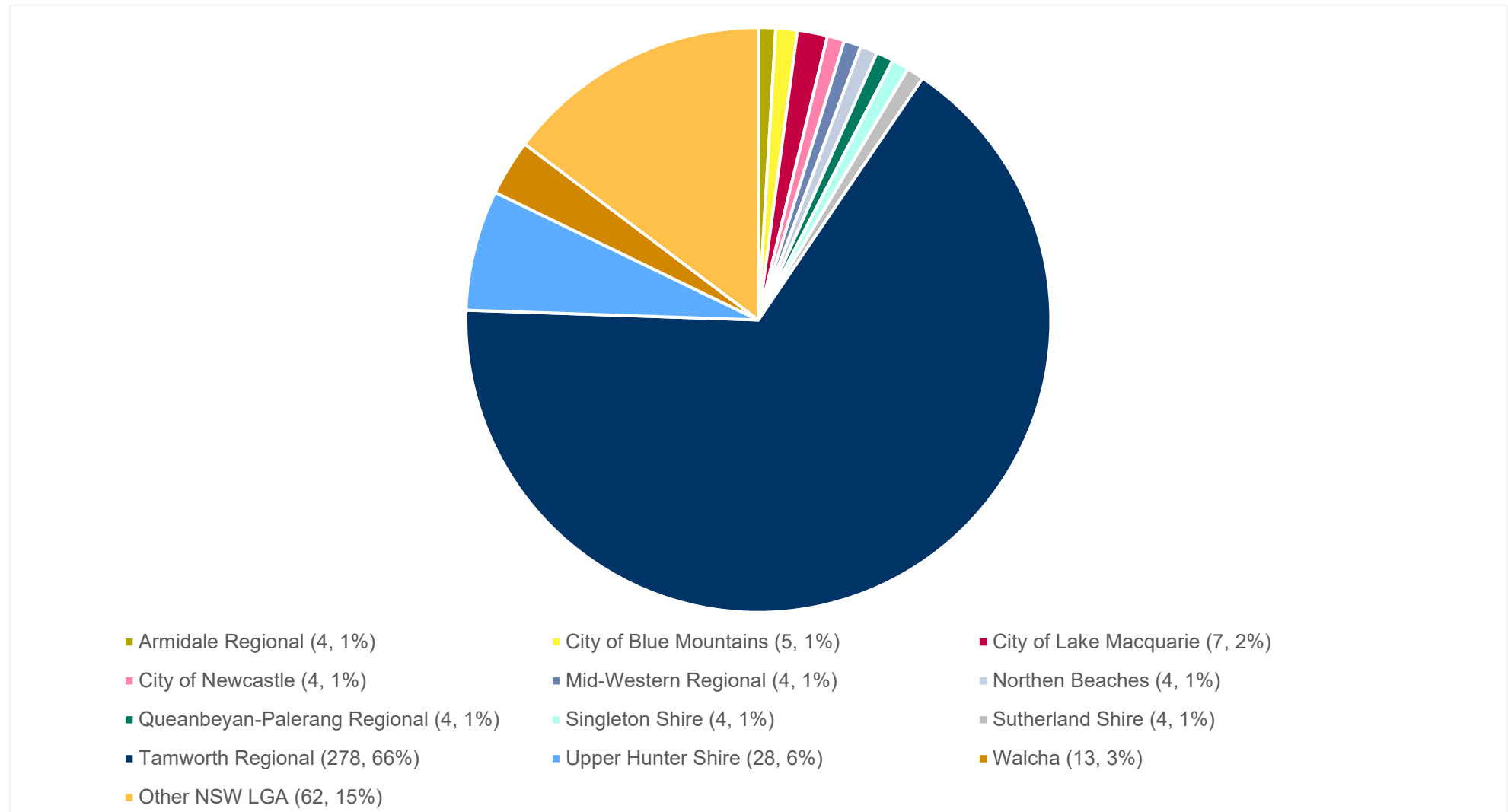
A total of 26.6% of submissions were received from residents located in LGAs not hosting wind turbine infrastructure. Of these, the most public submissions in relation to the Project were received from residents located in the Walcha Council LGA (13, 3%).

From the Nundle community there were 88 supporting submissions for the Project and from the Hanging Rock community there were 22 supporting submissions.

There were 107 objections from residents in the Nundle community, 30 objections from residents in the Hanging Rock community and 12 objections from residents in the Timor community. Of this, the majority came from host communities in and around Nundle and Hanging Rock.

Figure 2-1 illustrates the geographic distribution of public submissions received across NSW.

Figure 2-1 Public Submission NSW LGA Breakdown



2.3 Summary of Key Matters Raised in Community Submissions

2.3.1 Community Support

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

Table 2-2 Key Matters Raised in Community Submissions (Support)

Theme	Matter raised
Biodiversity	Increasing the wildlife corridor size to reduce risk of wildlife in the proximity of Ben Halls Gap Nature Reserve
Traffic and transport	The new travelling route will have a reduced impact on the environment
	Upgrading the roads will make the roads safer for residents
	Reduction in traffic movements up Devils Elbow and proposed bypass, and along Barry Road and Morrisons Gap road
	Traffic disruptions will be minimal
Project justification and environmental benefit	Strengthen the national and state power grids
	Contribute to the achievement of Federal and State renewable energy goals
	Appropriate location due to fewer residents in close proximity
	Expansion and utilisation of the FCNSW quarry in Hanging Rock makes more sense for the provision of materials required for construction
	Clean energy
	Environmental benefits outweigh negative impacts
	Replacement for the phasing out of fossil fuel generation
	Environmental benefits of using a quarry in proximity to the Project
Landscape and visual	Visual appeal of turbines representing progress on reducing climate change
Social and economic	Local employment opportunities
	Growing population (works and families) from employment and business opportunities
	Additional students for the local schools
	Attract tourists
	Ensures future generations will continue to use the natural resources of the area
	Opportunity to reduce the current cost of electricity increases
	Stimulate local economy
	Energy security for NSW and Australia
	Financial stimulus to local landholders
Community Engagement	Sufficient community engagement

146 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.

In addition to the strong level of support in the submissions received from individuals, one (1) submission in support was also received from a community organisation, being the Nundle Sport and Recreation Club. This organisation represents approximately 200 community members.

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:

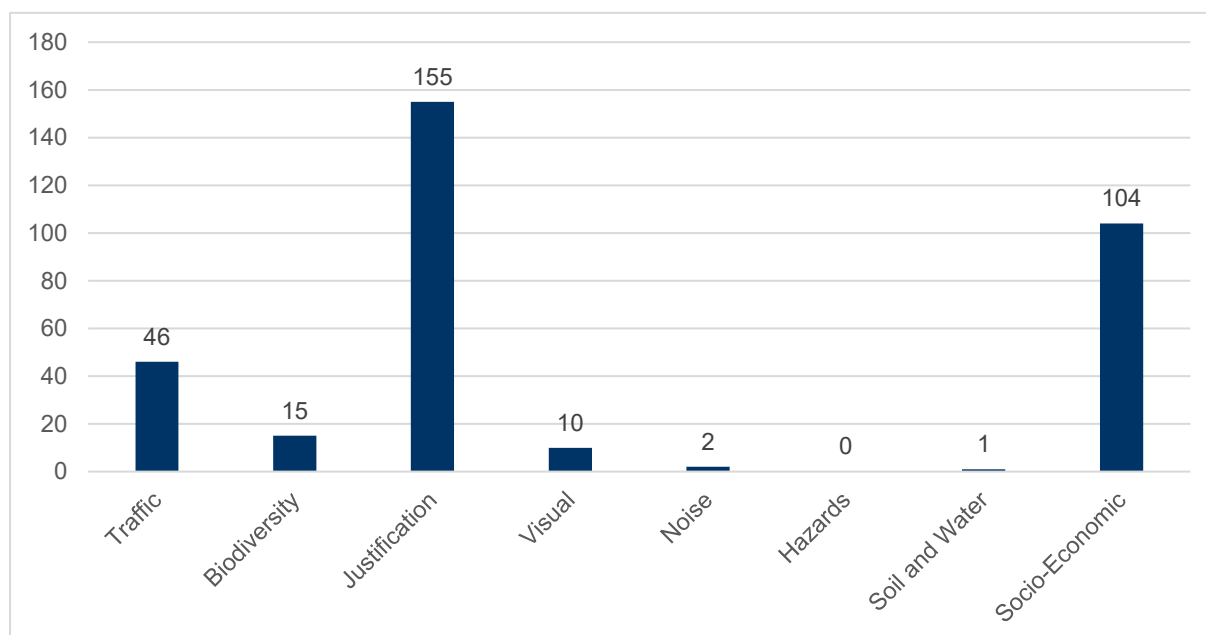
- the Community Enhancement Fund;
- job creation (211 direct and roughly 404 on-flow jobs during construction and approximately 28 long-term service and maintenance jobs created during Project operation, 16 of which are expected to be site based with additional on-flow jobs of 48 FTE (ie 76 FTE in total 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.
- an exclusive energy offer to all residences and businesses within 20 km of the Project, to provide discounted electricity usage and charges once the Project is operational.

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. The community submissions in support also acknowledged the improvement to increasing the wildlife corridor size to reduce risk of wildlife in the proximity of Ben Halls Gap Nature Reserve.

Figure 2-2 Key Matters Raised (Support)



2.3.2 Community Objections

A summary of key new matters raised in community submissions with regard to the latest Project Amendment in objection of the Project is provided in Table 2-3. Responses to new key issues raised in these community submissions has been provided in Chapter 5 of this report.

The community objections to the Project are predominately centred on negative biodiversity impacts and the traffic and transport impact in Nundle and neighbouring towns. The primary biodiversity concerns are related to vegetation clearing, impact to threatened ecological communities, the interruption of the koala habitats, and the risk of bird strike.

In addition, the community objections exhibit themes regarding visual impact, sensitive siting of renewable energy, and the Project's impact to the local character of the town.

The site selected for the Project was expressly acknowledged as unsuitable by the community objection submissions, noting that the soils and topography may lead to more frequent land slips and the possibility to contaminate nearby watercourses.

The community objection submissions reflect opinions that the community engagement undertaken was insufficient, noting an alleged lack of detail in the amended proposal and in plans for road and bridge construction, and lack of consultation with residents along Crawney Road, and neighbouring towns..

The key new matters raised in Community Submissions (Objections) are set out in Table 2-3 below. These submissions have been addressed by the Project as follows:

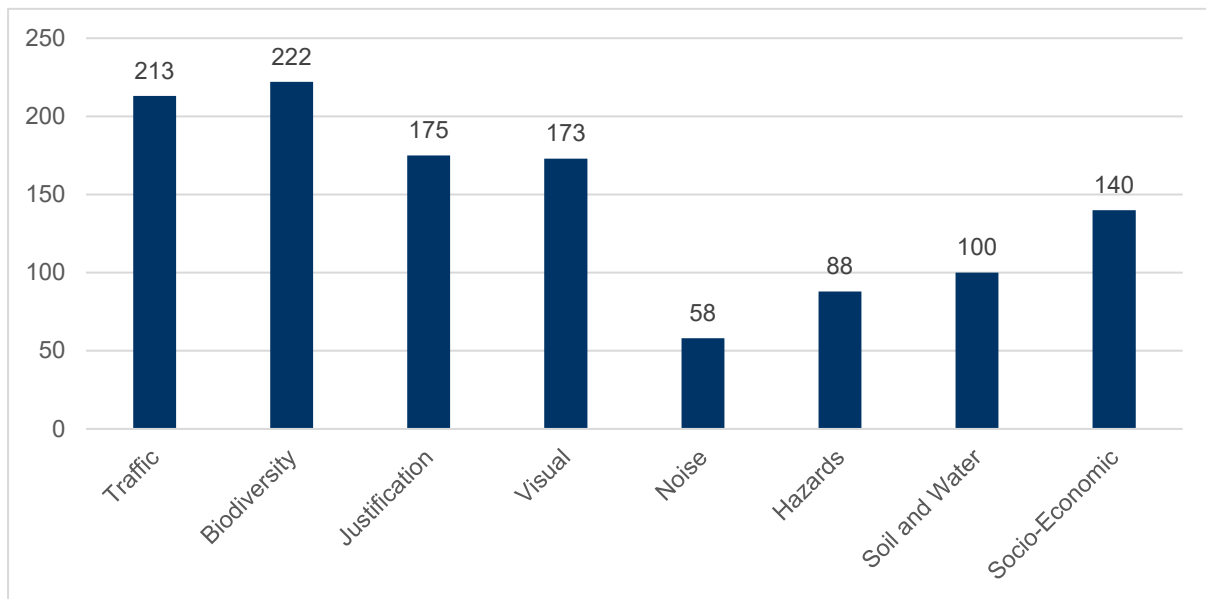
- detailed responses in Chapter 5;
- further project changes in Section 1.3; and
- details of Community Engagement in Chapter 3.2.

Table 2-3 Key New Matters raised in Community Submissions (Objections)

Theme	Matter raised
Biodiversity	Removal of WTG 41 and the relocation of 20 turbines does not remove the barrier effect to birds and bats returning to home roosts between the Project Area and Ben Halls Gap Nature Reserve, and does not remove the barrier effect and risk of bird and bat strikes
	Threat to Koala habitat noting that Koalas were listed as endangered under the EPBC Act on 12 February 2022
	Impact to native vegetation, Threatened Ecological Communities, Plant Community Types. Critically Endangered Ecological Communities, BC act listed fauna species
	Threat to connectivity corridor for threatened species and native flora and fauna
	Trees will not recover from the lopping required for OSOM movements
	Vegetation clearing required for alternate transport route (Option A, Option B, and Option C) impacting nightly feeding areas used by bats
	Proximity of alternate transport route (Option A, Option B, and Option C) to Crawney Pass caves
Traffic and Transport	OSOM route options are unsuitable due to roadworks required
	Transport route from the FCNSW quarry to the Project Area not addressed
	Concerns of safety from OSOM movements
	Damage to sealed roads
	Traffic impacting movement of emergency services
	Traffic disrupting business and operation freight
	Parking accessibility
	Nundle Bypass and Nundle loop options would cause major disruption to residents accessing essential services
	Construction of access roads on extreme gradients
	Bridges used for Jenkins Street / Crawney Road route option have not been assessed for load capacity
	School bus route interruptions
	No-parking zones on Jenkins Street affecting businesses
	Proximity of OSOM layovers to dwellings
Project description and justification	The Nundle Pony Club events will be affected by the use of Crawney Road as a construction transport route, including safety concerns for members travelling with horse floats and horses on Crawney Road
	Unsuitable siting of wind farm in proximity to Crawney Pass National Park, Ben Halls Gap nature Reserve, and Ben Halls Gap State Forest and Liverpool Ranges
	Clearance requirements for optional transmission line
	Lack of detail and engineering required for the upgrade of bridges and roadways
	Clarification if WTG has been relocated onto Crown Land
	Alternate transport route located on land zoned Environmental Conservation under the Tamworth LEP
	WTG 32 relocated closer to Ben Halls Gap Nature Reserve
Landscape and visual	Lack of land holder permissions on transport route
	Visual impact of revised optional substation and optional transmission line route
Noise and vibration	Visible transmission easement
	Early morning vehicular movements causing sleep disruptions
	Noise disturbance from vehicular movements
Heritage	Expansion of the existing FCNSW quarry will create additional noise impacts (crushing and blasting) for nearby residents
	Impact to heritage buildings along Jenkin Street due to vibration

Theme	Matter raised
Health and hazards	Undetermined Native Title Claim and Aboriginal Land Claim
	Lack of assessment of impact on Bicentennial National Trail across Crawney Pass
	Mental health impacts from ongoing protracted negotiation, and low frequency noise and construction noise
	Location of BESS in bushfire prone area and water supply that would be required to put out a battery fire
	Lack of detail on the fire suppressant systems that could prevent an environmental disaster from fire and the subsequent thermal runaway
Soil and water	Increase in vehicles and trucks traversing Nundle/Tamworth roads
	Impact to water sources used for stock, irrigation and domestic use
	Impact to primary watercourses
	Potential impact to groundwater
	Soil and water impacts of the optional FCNSW quarry expansion (e.g. erosion, flow of water into tributaries)
Flooding	Lack of detail in amended proposal and in plans proposed for road and bridge construction to prevent erosion and protect hydrology
	Construction of raised roads causing flooding
Air quality	Vegetation and earth clearing increase the risk of potential flash flooding
	Vehicular exhaust from construction traffic
Social and economic	Vehicles generating dust on unsealed roads despite use of mitigation measures
	Proposal has “divided the community”
	Loss of mobile phone coverage
	Job opportunities for existing residents
	Object to paying subsidies
	Opinion that the Proponent does not have a ‘social license’
	Insufficient information on where money from benefit funds will go, how it will be spent, and what percentage goes to Nundle and Hanging Rock’s community
Community Engagement	First Nation members of the community fearing loss of connection to land from the wind farm
	No photomontage of the ridgeline provided to residents
	Insufficient time to review and comment on the amendments
	Lack of consultation with neighbouring towns which will also be impacted
	Insufficient information on the Project website and at the information hub
	Lack of consultation with business owners in the town centre
	Difficult engaging at the Project office due to office hours

Figure 2-3 Key Matters Raised (Object)



3. STAKEHOLDER ENGAGEMENT

Since lodgement of the EIS in November 2020, the Amendment Report No. 1 in January 2022, and the Amendment Report No. 2 in December 2022, the Proponent has continued to actively consult with community members, community organisations, councils, and relevant government agencies. Consultation relating to the proposed amendments is ongoing.

3.1 Regulatory Engagement

A number of regulatory agencies were consulted in regard to the proposed amendments, through email, phone calls, and meetings, including:

- **Department of Climate Change, Energy, the Environment and Water (DCCEEW):** consultation has been undertaken regarding the proposed amendments since lodgement of the EPBC Act Referral Application. A request for variation to the EPBC Referral was submitted to DCCEEW in December 2022 updating the original referral with changes to reflect the most recent Amendment Report No. 2 and since lodgement of the original EPBC Referral. Feedback was provided in January 2023 and a revised request for variation to the EPBC Referral was submitted on 7 February 2023.
- **DPE:** an email summarising the optional proposed quarry was provided to DPE on 27 July 2022. The email included locations and photos of the optional proposed quarry, and listed the technical assessments proposed to support the Amendment Report No. 2. A meeting with DPE was held on the 30 August 2022 to discuss the proposed amendments more broadly. Feedback was provided to the Proponent from DPE on 8 September 2022 via a phone call. A further Project briefing meeting was held with DPE to discuss Project amendments on 18 October 2022. DPE has been updated regularly via phone calls in 2023 in the leadup to submission of this report.
- **DPE – Crown Lands:** consultation has been undertaken regarding Lot 7301 DP1136648 and Lot 7302 DP1136648. A meeting was held with DPE – Crown Lands on 11 July 2022. This consultation has confirmed that Lot 7301 DP1136648 and Lot 7302 DP1136648 are:
 - Crown Reserves for the purposes of a Travelling Stock Route (TSR) and Access, managed by Local Land Services;
 - subject to the Gomeroi Native Title Claim and a claim under the *Aboriginal Land Rights Act 1983* (NSW) (Aboriginal Land Claim), both currently undetermined. Consultation is being undertaken with the Gomeroi Native Title applicant group representatives (Gomeroi Applicant), who have been supportive of the Project to date, seeking to transfer ILUA negotiations to Crown Lot 7301 DP1136648 and Lot 7302 DP1136648;
 - it is likely that authorisation to use the reserve(s) will be required under the *Crown Land Management Act 2016* through Crown Lands. As part of the consideration of a licence, concurrence of Local Land Services would be required.
 - feedback was sought on design considerations for the current proposed route and whether shorter routes across Crown Land could be considered. This has been taken into consideration and consultation with LLS and DPE – Crown Lands is ongoing.

A further meeting was held with **Crown Lands – Tamworth Branch** on 18 January 2023. Discussion involved the process for applying for a crown license for different types of project infrastructure that intersects the formed and unformed road corridors. It was discussed the merits of the transport access options to site and greater context around the submission received. It was agreed a site visit be undertaken with representatives of the Project.

A site visit on 23 February 2023 was held with representatives of the Crown Lands Tamworth branch. Representatives of the Project provided further design information on the alternate transport route options being assessed. It was confirmed that Option B remains Crown Lands preferred option with consideration of the existing travelling stock route and biodiversity values. Feedback was provided on the Crown license application process for Project infrastructure across Crown corridors, including ensuring the any physical access is not impeded, and in any event that this occurs, a right of way can be granted.

- **Local Land Services:** an email summarising access through the Crown Lot 7301 DP1136648 was provided to LLS on the 27 June 2022. A subsequent site visit was undertaken with two LLS team members on the 7 June 2022 to consider access through Lot 7301 DP1136648 and Lot 7302 DP1136648. Three options for access through crown lots were investigated. The outcome of this was:
 - the existing farmers access would be most beneficial to use and upgrade (Option A or Option C), where possible;
 - improving vehicle access through these reserves is a general benefit to LLS, however minimising impact to stock access across the Travelling Stock Route (TSR) is a key objective. Road crossing locations for stock should be considered during Detailed Design, where possible;
 - there is a creek crossing a short distance into the reserve off Crawney Road (Wombramurra Creek) which requires a suitable crossing to be designed and installed, such as box culverts. LLS noted that crossings should be designed and installed in line with good industry practise and relevant DPI guidelines;
 - alternate access locations were inspected further south down Lot 7301 where it appeared that less vegetation existed (Option B), however this option was not recommended by LLS for the following reasons:
 - Section 75 of LLS Act only allows approval of one access through the reserve, and there already exists an access. Therefore, utilising Option B would involve construction of a new greenfield access road including creek crossing, and may require the removal of the existing farm access road (Option A).
 - there would be greater environmental impact to create a new greenfield access than to upgrade the existing access (Option A).
 - the terrain appears most suitable at the existing access.
 - The environmental values of the reserves were discussed, including preserving the Objectives of C2 Land Zoning (Environmental Conservation under the Tamworth LEP 2010. Offsetting any access road impacts to vegetation in the reserves with further tree planting or improvement to riparian areas was discussed, however LLS suggested that this may not be a priority in Lots 7301 and 7302 given the established vegetation that exists. As an alternative, LLS suggested that the Proponent could commit to improving weed control in the reserve. Some areas of Blackberry and St. John's Wort have been observed in the area. A weed control program could involve weed spraying contractor engaged on a campaign of approximately 2 times per year for approximately 2 days of spraying.

This is especially relevant to Lot 7301. The Proponent could further consult with LLS on this to see if this could be integrated into LLS' existing weed control programs.

LLS encouraged the Proponent to continue consultation with LLS, including provision of detailed designs for the proposed road for review, after development approval is granted.

- **DPE - BCS:** consultation has been undertaken regarding concerns raised by BCS in their advice received on 1 of February.
 - a meeting was held with BCS on 11 March 2022 and again on 13 May 2022, during which further assessment and results of assessment with proposed commitments were discussed.
 - the consultation resulted in the removal of WTG 41, relocation of turbines along BHGMR, assessment of Serious and Irreversible Impact to threatened bat species, assessment of moderate risk of impact turbines and commitments for further mitigation within the BBAMP and Owl survey methodology.
 - the agreed actions have been completed and a technical note has been shared with BCS on the 8 July 2022 for further discussion.
 - further consultation was undertaken on 16 August 2022 to discuss methods for finalising the requirements for impact assessment for threatened owl species.
- **NSW EPA:** an email summarising the optional proposed quarry was provided to NSW EPA on 27 September 2022. The email included locations and an aerial of the optional proposed quarry, and listed the technical assessments proposed to support the Amendment Report No. 2. Extractive industries and possibly crushing, grinding and separating will also need to be included as scheduled activities on the Environment Protection Licence.
- **Transport for NSW:** A call was made in December 2022 and feedback sought on the TfNSW submission. Clarification was provided to the extent of revised concept design and further assessment required. This assessment was undertaken and provided to TfNSW on 6 February 2023
- **Elected Officials:** Offers for meetings to provide project updates have been made to MP Kevin Anderson and Mayor Webb of Tamworth Regional Council. The Proponent will continue to include these stakeholders in ongoing community engagement.

3.1.1 Council Engagement

The Proponent notified **Tamworth Regional Council** (TRC) of the proposed amendments via email and subsequently presented to TRC on 16 August 2022. The presentation included a photo of the proposed quarry location and area, and listed the technical assessments proposed to support the Amendment Report No 2. The presentation included actions to provide TRC road survey and transport corner designs which is ongoing.

A meeting was held between representatives of the Project and all planning team members of TRC on 16 February 2023. Key agenda items included a summary of the submissions received, updated designs for road upgrades and traffic management within Nundle (shared prior to the meeting), biodiversity values, and the community enhancement fund. A discussion was held on commitments relating to road dilapidation and performance bonds available from the Project. The Proponent addressed misinformation regarding removal of trees opposite Nundle Primary School and updated TRC on the route options for the transportation of blades and potential impacts. TRC noted that the removal of proposed trees is preferable to 192 blade movements through the main Jenkins Street / Oakenville Street intersection. Subject to Project approval, the Proponent committed to working with TRC to develop a community enhancement fund and to obtaining a S138 permits under the *Roads Act 1993*. It was TRCs preference to engage with DPE on any potential conditions for use of Council roads.

Further, an email was provided to **Upper Hunter Shire Council** (UPHSC) on 9 October 2022 to notify of the proposed amendments and an offer was made for the Proponent to present to UPHSC.

On 5 December 2022 a submission was provided by UPHSC where it was noted that they had no concerns or comments regarding the amended Project.

On 20 February 2023, a Project representative had a meeting via phone with the Acting General Manager of Liverpool Plains Shire Council (LPSC) to provide a Project update and to discuss Projects commitments regarding soil erosion measures and road use conditions. The Deputy Mayor and Acting General Manager of LPSC attended the Wallabah Community Information session held on the 23 February 2023.

3.2 Community Engagement

Ongoing consultation with the community since June 2022 has included:

- Information sessions with members of the Project team in June 2022 to advise that an alternate route was being investigated and that, while a number of studies were yet to be conducted, the Proponent felt it important to advise the community early of this potential change to the Project, and potential delays to the planning process. Drop-in information sessions were held for three hours each morning of 7-9 June 2022, at two local cafes in Nundle. Evening drop-in sessions were held in Timor, Hanging Rock and Nundle, 7-9 June 2022. While the Timor event was not well-attended, around 25 residents attended the Hanging Rock sessions, and about 45 attended the evening session in Nundle, including a number of Crawney Road residents.
- Members of the Project team visited landowners whose land would be required for the alternate Crawney Road and Nundle Bypass route. All landowners advised that they were willing to work with the Project to negotiate land access to their properties.
- Meetings were held with both the State Member for Tamworth, Kevin Anderson MP and Tamworth Regional Council Mayor Russell Webb on 23 June 2022. In both meetings, the proposed alternate Crawney Road route was presented, with discussion focused on further studies required, particularly related to heritage and biodiversity.
- A presentation was given to the Nungaroo Aboriginal Land Council (LALC) on 27 June 2022 and discussions have taken place with the Gomeroi Applicant. The Proponent asked for two representatives from both the Land Council and Native Title group accompanied the Project team on a site visit and walkover as part of the Amended Cultural Heritage Assessment Report (CHAR).
- Both groups have advised they remain supportive of working with the Proponent with a commercial agreement to be developed with Nungaroo and an Indigenous Land Use Agreement (ILUA) to be entered into with the Gomeroi Applicant. The Project is currently working with the Gomeroi Applicant on a funding and engagement deed to support the process of entering into an ILUA for the Project.
- A First Nations Open Day was held on the 12 November 2022 at the Hills of Gold Wind Farm Community Hub in Nundle, local Aboriginal elders attended from Nundle and Hanging Rock. Buses were provided to anyone who needed to travel from Tamworth and Quirindi to Nundle, where a project update and morning tea were provided at the Hills of Gold Wind Farm Community Hub.
- The Project team presented the proposed amendments to the Nungaroo LALC at their meeting on 5 December 2022. The meeting also focused on the specifics of an offer from the Project to Nungaroo LALC that would form the basis of an Aboriginal Land Agreement for Crown Lots that are subject to an undetermined Aboriginal Land Claim.
- ENGIE opened the Hills of Gold Wind Farm Community Information Hub in August 2022 on the corner of Jenkins Street and Oakenville Street, Nundle (refer Figure 3-1). Among the Project information provided in the Community Hub is a scale model display of the Project Area and turbine layout. Changes to this model have been made to reflect the Project amendment and comments from the community. The community information hub is staffed by a local Nundle resident and is open one day per week when the Project team are not in Nundle.

- Information sessions with members of the Project team on 31 August and 1 September 2022 in the new Community Hub to provide updates on the potential project changes and distribute an updated suite of factsheets about key projects aspects: traffic and transport, social and economic benefits, soil and water, visual impacts, land clearing, location, noise.
- 'Local Voices' campaign: a campaign was conducted from June to September 2022 and aimed to raise the profile of the many local supporters of the Project. The campaign included radio and print advertisements featuring local community members highlighting why they think the Project will benefit the community. Members of the community, including prominent Nundle business owners also sent letters of support to local MPs and presented to Tamworth Regional Council about why they support the Project.
- A letter and map showing an overview of the proposed amendments was posted to all residential addresses in Nundle and Hanging Rock in early September.
- An online project update and discussion about the proposed amendments was had with the Community Consultative Committee on 13 October 2022.
- Information sessions with members of the Project team on 9-11 November 2022 in the Community Hub to provide updates on the potential project changes, particularly the transport route and the upcoming public exhibition period. Meetings were also held with landowners living along the transport route during this visit.
- A First Nations Open Day was held on the 12 November 2022 at the Hills of Gold Wind Farm Community Hub in Nundle, local Aboriginal elders attended from Nundle and Hanging Rock. Buses were provided to anyone who needed to travel from Tamworth and Quirindi to Nundle, where a project update and morning tea were provided at the Hills of Gold Wind Farm Community Hub.
- An email was sent to the subscriber list of 297 email addresses on 18 November to advise the Amendment Report No. 2 was on public exhibition. The email gave an overview of the proposed project changes, where the report could be accessed, and promoted how the community could engage with the Project team to discuss any queries or concerns.
- A [four page factsheet](#) was developed giving details about the proposed amendments. The factsheet was distributed electronically through a link sent to all email subscribers and via the Project website (engie.com.au/hillsofgold), and via hardcopy at the Community Hub in Nundle.
- During the Public Exhibition period, team members were based at the Community Hub in Nundle on 29 and 30 November, and 6 and 7 December 2022. Information sessions with the Project team were again held during these visits the Project team also visited community members in their homes and hosted them in the shopfront.
- The Project team presented the proposed amendments to the Nungaroo LALC at their meeting on 5 December 2022. The Project team presented the proposed amendments to the Nungaroo LALC at their meeting on 5 December 2022. The meeting also focused on the specifics of an offer from the Project to Nungaroo LALC that would form the basis of an Aboriginal Land Agreement for Crown Lots that are subject to an undetermined Aboriginal Land Claim.
- Newsletters continued to be distributed to the community quarterly, both via email to a subscriber list of 297 email addresses, and via hardcopy – delivered to all addresses at Nundle, Hanging Rock and Crawney. The edition distributed in August 2022 provided early information about the Project amendment, particularly the change to the transport route, and encouraged the community to visit the Community Hub while project members were onsite. The newsletter distributed in November 2022 gave more detailed information on the Project amendment, relating to the transport route, the optional quarry expansion, and potential location changes to turbines, substation, and the BESS. The newsletter also highlighted the updated Project timeline and encouraged the community to attend Project information sessions in December 2022, during the public exhibition period.

The newsletter distributed in February 2023 gave more detailed information on the proposed transport route, selection of a preferred balance of plant contractor, information on community enhancement funding, and a general Project update.

- Regular print and digital advertisements were placed in the Northern Daily Leader Newspaper (Tamworth) and the Hunter River Times (Singleton), particularly ahead of information sessions with the team, the public exhibition period, and to promote the benefits of the Project and key information.
- In the period June 2022 to January 2023, eight local residents and four local (regional) businesses have enquired directly about future employment and supplier opportunities.
- The Nundle Community Information Hub was opened and information sessions were held on 22 and 23 February 2023 with a number of representatives of the Project present. Fifteen members of the community attended the information sessions over the two days. The transport route and impacts to trees in Nundle were the main focus of discussion.
- Community information session was held in Wallabadah on the 23 February 2023. It was attended by 23 people, with a range of views and questions about the Project. Primary discussion points included who are ENGIE as a corporate citizen, potential impacts to roads and water courses, visual impacts of the transmission line and switching station, and decommissioning. There was a general sentiment of support for the Project. The Deputy Mayor and Acting General Manager of LPSC attended the session.

Figure 3-1 Community Information Office



4. RESPONSES TO PUBLIC AUTHORITY SUBMISSIONS

As noted in Section 2.1, a total of 17 public authorities provided comments on the Amendment Report No. 2.

Of the public authority submissions received, Tamworth Regional Council and Muswellbrook Shire Council objected to the Project, and all other agencies submitted comments.

The following public authorities raised no further comments or matters in their submission:

- NSW Department of Regional NSW – MEG Division;
- Upper Hunter Shire Council;
- City of Newcastle
- Airservices Australia; and
- CASA.

Submissions in support were received by NSW Department of Regional NSW, MEG Division, and Forestry Corporation of NSW in response to the EIS in 2021.

Each new matters raised by these agencies have been addressed in Table 4-1 and Table 4-17 inclusive.

Table 4-1: DPE Water Submission Responses

Reference #	Theme	Submission	Response
DPE Water_1	Soil and water	Recommendation (Post approval): 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).	Noted, and included in Appendix B, Updated Mitigation Measures 2023.
DPE Water_2		Recommendation (Post approval): ensure that relevant nomination of work dealing applications for Water Access Licences (WALs) proposed to account for water take by the Project have been completed prior to the water take occurring.	Noted, and included in Appendix B, Updated Mitigation Measures 2023.
DPE Water_3		Recommendation (Post approval): comply with the rules of the relevant water sharing plans.	Noted, and included in Appendix B, Updated Mitigation Measures 2023.
DPE Water_4		Recommendation (Post approval): prepare a Construction and Operational Environmental Management Plan (incorporating an Erosion and Sediment Control Plan) prior to commencement of activities.	The Proponent has committed to developing an Environmental Management Strategy (EMS) to guide proposed activities associated with the construction, operation and decommissioning and rehabilitation of the Project. This will include a developing a detailed Soil and Water Management Plan (SWMP) prior to the commence of construction, outlining measures for the management and monitoring of surface water quality and hydrology during construction of the Project, in addition to a separate SWMP for the optional quarry expansion. Each SWMP will include a Progressive Erosion and Sediment Control Plan (PESCP) to address management requirements at individual work sites as the Project progresses. The PESCP will be developed by an experienced Certified Professional in Erosion and Sediment Control (CPESC). The above commitments are included and further described in Appendix B, Updated Mitigation Measures 2023.
DPE Water_5		Recommendation (Post approval): works within waterfront land are in accordance with the Guidelines for Controlled Activities on Waterfront Land.	Noted, and included in Appendix B, Updated Mitigation Measures 2023.
DPE Water_6		Recommendation (Prior to determination): provide additional quantitative detail, such as local groundwater levels and maximum proposed excavation depths, to demonstrate that the proposed activities will not intersect groundwater and therefore do not constitute an aquifer interference activity in accordance with the NSW Aquifer Interference Policy (AIP).	Section 2.1.4 of Appendix O to the Project EIS reported that the proposed Project works are considered as having minimal impact on water dependent assets and aquifer interception is therefore not anticipated. The most significant excavation works are the work pads and associated wind turbine foundations to a depth of approx. 3 – 5 m, in addition to cuttings which may be approx. 10 – 15 m in depth. Based on existing water source bore holes the depth of the water table exceeds 60m. Australian Resource Development Group (ARDG) has provided a further response to address the potential for the optional FCNSW quarry expansion to intersect a groundwater aquifer which is provided in Appendix D. The response concluded that the extraction activities associated with the optional FCNSW quarry expansion are not predicted to intersect any groundwater aquifers. A drilling program will be undertaken in relation to the optional quarry expansion prior to construction to define the extent and geotechnical properties of the rock to depth. This commitment is described further in Appendix B, Updated Mitigation Measures 2023.

Table 4-2: DPE - Biodiversity Conservation and Science Directorate (BCS) Submission Responses

Reference #	Theme	Submission	Response
BCS_1	Biodiversity – Serious and Irreversible Impacts (SAII)	BCS supports the increased hub height from 135 m to 150 m and reduced blade length from 85 m to 82 m.	Noted.
BCS_2		BCS supports the implementation of an adaptive low wind-speed turbine curtailment strategy.	Noted.
BCS_3	Biodiversity – Moderate-risk turbines	Recommendation: Where moderate risk turbines are unrelocatable and proposed to be retained detailed justification is required. In the absence of detailed justification, the relative impact of each turbine should be considered and turbines resulting in the highest biodiversity impact should be deleted.	WP 24 has been designed with temporary blade storage assumed in the development footprint. The Project has made a commitment to reduce direct impact by using a 'just in time' construction method which would remove the impact of temporary blade storage from this area and reduce direct impacts to PCT 1194. This method has already been proposed for WP28 and the direct impacts reduced in the Updated BDAR (refer Appendix F). These WTGs are located with low cumulative impacts and support the Project with slightly above average clean energy generation. The Proponent considers them important in the overall viability of the Project and has committed these WTGs into the more extensive Bird and Bat Adaptive Management Plan curtailment regime to avoid significant impact of blade strike for microbats (refer Appendix B, Updated Mitigation Measures 2023). It is noted by BCS that turbines have been removed previously, one of which WP 23, located further south was one of these demonstrating a reduction of impact in the area.
BCS_4	Biodiversity – Owl breeding habitat	BCS is satisfied that the methodology to survey potential owl breeding habitat employed is as agreed.	Noted.
BCS_5	Biodiversity – Biodiversity credits	Recommendation: The BDAR be updated to correctly record the credit requirement for Southern Myotis and Koala.	The Updated BDAR (refer Appendix F) has been updated to correctly reflect the required credits across all IBRA subregions.
BCS_6		Recommendation: Ensure that all data entered into the BAM-C is consistent with the field data.	Floristic data for Plots 25 and 26 were recovered (note the inclusion of the data in the first revision of the Nandewar Peel BAM-C case) and BAM-C updated with the correct data. Flow on effects of these updates included changes to Vegetation Integrity scores for 934_DNG and 1194_High, resulting in an increased number of credits for impacts to those two (2) vegetation zones, as well as all associated species credit species.

Reference #	Theme	Submission	Response
			The Updated BDAR (refer Appendix F) has been updated to correctly reflect the required credits across all IBRA subregions.
BCS_7	Biodiversity – Direct and indirect impacts	Recommendation: The proponent should determine an access option for the subject site based on the option which would present the least relative impact to biodiversity values	<p>The Proponents preference is to maintain the three (3) access options proposed in the Amendment Report No. 2. The Proponent seeks approval on these but commits to only using one of the access options to be determined in final design. The Proponent notes:</p> <ul style="list-style-type: none"> the existing farmers access would be most beneficial to use and upgrade (Option A or Option C), where possible; Option A provides an opportunity to upgrade an existing creek crossing and minimising impact on further creek crossings and associated bridge upgrades that would be required further upstream with other creek crossings and an existing bridge (noting concerns raised by the public of bridge upgrades); Option B is the closest option to nearby residential dwellings; and Option A would present a lower overall impact and would be the preference of the Proponent if one access had to be selected. This would reduce impacts from what has been assessed as worst case.

Table 4-3: NSW Environment Protection Authority (EPA) Submission Responses

Reference #	Theme	Submission	Response
EPA_1	Noise and vibration – Optional quarry expansion	Recommendation: The EPA recommends that any planning approval apply standard construction hours to any concrete batching activities unless strong justification is provided for the need to carry out these activities outside of standard hours. The previous advice with respect to the application of all feasible and reasonable mitigation measures, the preparation of a Construction Noise and Vibration Management Plan, and the need for any blasting impacts to comply with the relevant ANZEC guidelines and criteria, are also applicable to the amended project as described in the NVA.	Noted, and included in Appendix B, Updated Mitigation Measures 2023.
EPA_2		Recommendation: the EPA recommends that all feasible and reasonable noise mitigation and work practices be applied to the quarrying activities associated with the Project construction phase, including the measures outlined in the 'Recommendations' subsection of Section 7.2 of the NVA. These requirements should be applied as conditions within any planning approval.	Noted, and included in Appendix B, Updated Mitigation Measures 2023.

Table 4-4: Department of Primary Industries - Agriculture (DPI Agriculture) Submission Responses

Reference #	Theme	Submission	Response
DPI Agriculture_1	Decommissioning	We request that DPE acknowledge our requirement for the removal of all underground infrastructure to 500 mm at decommissioning in the determination documents.	Noted. When decommissioning is required, below ground infrastructure, including the WTG foundations and hardstands to a depth less than 500 mm would be left in situ and covered in clean fill material, with the area adequately graded to reflect the scope of the surrounding area and to mitigate the risk of soil erosion (refer to Appendix A, Updated Project Description).

Table 4-5: Department of Primary Industries - Fisheries NSW (DPI Fisheries) Submission Responses

Reference #	Theme	Submission	Response
DPI Fisheries_1	Biodiversity – Key fish habitat	Recommendation: All waterway crossings (including temporary and permanent access tracks) should be designed and constructed in accordance with: a. DPI Policies and Guidelines for Fish Habitat Conservation and Management (2013); and b. 'Why Do Fish Need to Cross the Road?' – Fish Passage Requirements for Waterway Crossings (2003).	Noted, and included in Appendix B, Updated Mitigation Measures 2023.
DPI Fisheries_2		Recommendation: The potential distributions of local threatened species of fish (including Eel Tailed Catfish and Southern Purple Spotted Gudgeon) should be considered and avoided or mitigated.	An updated Technical Note has been prepared by Biosis covering potential impacts to threatened species raised by DPI Fisheries (refer Appendix E).

Table 4-6: Heritage NSW (HNSW) Submission Responses

Reference #	Theme	Submission	Response
HNSW_1	Heritage – Historic	The subject site is not listed on the State Heritage Register (SHR), nor is it in the immediate vicinity of any SHR items. Further, the site does not contain any known historical archaeological relics. Therefore, no further heritage comments are required.	Noted.

Table 4-7: Department of Regional NSW – Mining, Exploration & Geoscience (MEG) Submission Responses

Reference #	Theme	Submission	Response
MEG_1	N/A	MEG-GSNSW has reviewed the Amendment Report No. 2 for Hills of Gold Wind Farm and has no additional comments or issues to raise to those provided in the Response to Submissions (our ref DOC22/26458).	Noted.

Table 4-8: WaterNSW Submission Responses

Reference #	Theme	Submission	Response
WaterNSW_1	Soil and water	Prior to construction commencing, prepare a detailed Soil and Water Management Plan (SWMP), outlining measures for the management and monitoring of surface water quality and hydrology during construction.	The Proponent commits that prior to construction commencing, a detailed Soil and Water Management Plans (SWMP) will be prepared, outlining measures for the management and monitoring of surface water quality and hydrology during construction of the Project, in addition to a separate SWMP for the optional quarry expansion. The SWMPs will 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 SWMPs will be prepared by a suitably qualified person, such as a soil conservationist. The above commitment is included and is further described in Appendix B, Updated Mitigation Measures 2023.
WaterNSW_2		An operating condition requiring that: The Applicant must ensure that the development does not cause any impacts on Chaffey Dam or the quality of water flowing into the Chaffey and Glenbawn catchments, including the implementation of all soil and water management and monitoring measures for the life of the Project.	The Proponent will ensure that the development does not cause any material harm to water quality in Chaffey Dam or the quality of water flowing into the Chaffey and Glenbawn catchments. The Project Area is located within the Peel River catchment and drains via overland sheet flow (when soils are saturated) to ephemeral drainage depressions on the southern side of the site, which drain to Quackanacka Gully, which in turns drains to Burrows Creek and eventually the Peel River, approximately 3 km downstream from Nundle (4.8 km to the west of the Project Area). The Peel River flows via Chaffey Dam and Tamworth to the Namoi River, with the confluence being located approximately 8 km downstream of Keepit Dam. A monthly water quality monitoring program will be developed in consultation with NPWS until the site temporary disturbance has fully rehabilitated post construction, as further described in Appendix B, Updated Mitigation Measures 2023.
WaterNSW_3		Effective erosion and sediment controls shall be designed, installed and maintained for the duration of the Project, in accordance with 'Managing urban stormwater: soils and construction. Vol. 1, 4th Edition' (the 'Blue Book') (Landcom, 2004).	The Proponent commits that erosion and sediment controls will be designed, installed and maintained for the duration of the Project, in accordance with the 'Blue Book' (Landcom, 2004). Progressive Erosion and Sediment Control Plans (PESCPs) will be included within the SWMPs as the Project progresses to address management requirements at individual work sites to be developed by an experienced Certified Professional in Erosion and Sediment Control (CPESC). The above commitments are included and are further described in Appendix B, Updated Mitigation Measures 2023.
WaterNSW_4		Access for WaterNSW staff and contractors is to be maintained for all monitoring sites and gauging stations during construction and operation.	The Proponent commits that access for WaterNSW staff and contractors will be maintained for all monitoring sites and gauging stations during construction and operation of the Project (refer Appendix B, Updated Mitigation Measures 2023).
WaterNSW_5		WaterNSW is to be consulted during the detailed design phase related to any road upgrade works that facilitate vehicle movement for the Project along Crawney Road to ensure the adequate protection of WaterNSW water quality monitoring sites.	The Proponent commits that WaterNSW will be consulted during the detailed design phase related to any road upgrade works that facilitate vehicle movement for the Project along Crawney Road to ensure the adequate protection of WaterNSW water quality monitoring sites (refer Appendix B, Updated Mitigation Measures 2023).

Table 4-9: Transport for NSW (TfNSW) Submission Responses

Reference #	Theme	Submission	Response
TfNSW_1	Traffic and Transport	Unclear how the proposed split 35% and 65% for construction will be managed.	Transport Planning Partnership (TPPP) has provided a response to these issues raised by TfNSW in the Traffic and Transport Assessment Addendum 3 (refer Appendix C).
TfNSW_2		The following additional information is required regarding proposed Route 2, ("Nundle Bypass") in particular, information regarding the key intersection of Oakenville Street and Heron Street North, which may impact the classified road network. It is recommended that the Consent Authority request the applicant to: Update the Amendment Application to reflect the proposed traffic impacts at the key intersection addressing the above points for consideration and identify any potential upgrades required.	
TfNSW_3		What the existing general road geometry (including turn treatments) is at the key intersections for Route 2.	
TfNSW_4		Whether the intersections are currently capable of accommodating two-way movements of heavy vehicle at each leg of the key intersections, in particular during concurrent opposing heavy vehicle turn movements.	
TfNSW_5		If an upgrade of the intersections is required to accommodate an increase in traffic and the swept paths of the design vehicles and the extent of that work if applicable.	

Table 4-10: Crown Lands (CL) Submission Responses

Reference #	Theme	Submission	Response
CL_1	Engagement	The Department recommends including direct communication with the Tamworth Crown Lands office in the listed planned engagement.	Tamworth Crown Lands were consulted on their submission on the 18 of February 2023. Tamworth Crown Lands have undertaken an independent site visit and the Proponent has offered a site visit to discuss opportunities in detailed design on the proposed Crawney Access Options proposed on 21 February 2023. Further information has been shared by Tamworth Crown Lands on the Crown Land License application process and engagement undertaken on the proposed use of Crown Land where wind farm infrastructure crosses unformed crown road corridors (refer Section 3.1).
CL_2	Heritage – Land Claims and Native Title	Previous advice regarding consent requirements and limitations including Aboriginal Land Claims and Native Title remains relevant and should be referred to. Aboriginal Land Claims and the Gomeroi Native Title Claim exist over the Crown land proposed to be impacted by this project.	Consultation is being undertaken with the Gomeroi Applicant, who have been supportive of the Project to date, seeking to transfer Indigenous Land Use Agreement (ILUA) negotiations to Crown Lot 7301 DP1136648 and Lot 7302 DP1136648. A presentation was given to the Nungaroo LALC on 27 June 2022 and discussions have taken place with the Gomeroi Native Title applicant group representatives. The Proponent asked for two representatives from both the Land Council and Native Title group accompanied the Project team on a site visit and walkover as part of the Amended Cultural Heritage Assessment Report (CHAR). Both groups have advised they remain supportive of working with the Proponent with a commercial agreement to be developed with Nungaroo and an ILUA to be entered into with the Gomeroi Applicant. Further, the Project is currently working with the Gomeroi Applicant on a funding and engagement deed to support the process of entering into an ILUA for the Project. A First Nations Open Day was held on the 12 November 2022 at the Hills of Gold Wind Farm Community Hub in Nundle, local Aboriginal elders attended from Nundle and Hanging Rock. The Project team presented the proposed amendments to the Nungaroo LALC at their meeting on 5 December 2022. The meeting also focused on the specifics of an offer from the Project to Nungaroo LALC that would form the basis of an ILUA for Crown Lots that are subject to an undetermined Aboriginal Land Claim.
CL_3	Traffic and transport – Site access	All three of the provided alternate access routes impact Crown land (Lot 7301 and 7302 of DP 1136648, Lot 26 of DP 755349 and Lot 1 of DP 210662). Access option B presents the lowest level of impact to Crown land.	Noted. It remains the Proponents preference to maintain the three (3) access options proposed in the Amendment Report No. 2. The Proponent seeks approval on these but commits to only using one of the access options to be determined in final design. The Proponent notes that Option B is the closest access option to residential dwellings, being NAD_22 and AD_74.

Table 4-11: Airservices Australia (Airservices) Submission Responses

Reference #	Theme	Submission	Response
Airservices_1	Aviation	Given that the maximum overall height of this wind farm remains the same as the previous assessment and the wind generator turbine's location are within the previous assessed wind farm area, our previous assessment remains valid.	Noted.

Table 4-12: Civil Aviation Safety Authority (CASA) Submission Responses

Reference #	Theme	Submission	Response
CASA_1	Aviation	CASA has reviewed the Appendix J Aviation Advice Letter of 03 November 2022 by Aviation Projects. The changes described in the Letter, including the removal of turbine number 41 and the relocation of 20 turbines, make no difference to previous CASA comments and recommendations. All previous CASA assessments and recommendations remain the same.	Noted.

Table 4-13: NSW Fire and Rescue (FRNSW) Submission Responses

Reference #	Theme	Submission	Response
FRNSW_1	Hazards – Bushfire	Recommendation: That a comprehensive Fire Safety Study (FSS) is developed. The FSS is to be developed in accordance with the requirements of the Hazardous Industry Planning Advisory Paper (HIPAP) No.21 and is to meet the operational requirements of FRNSW.	Noted.
FRNSW_2		Recommendation: That the development of the FSS consider the operational capability of local fire agencies and the need for the facility to achieve an adequate level of on-site fire and life safety independence. The FSS should consider worst-case fire scenarios including a full BESS unit fire and demonstrate no fire propagation within the facility.	
FRNSW_3		Recommendation: That the FSS be submitted, reviewed, and meet the operational requirements of FRNSW prior to any further submission being made to FRNSW; this includes: an Initial Fire Safety Report (IFSR) and / or Performance-Based Design Brief / Fire Engineering Brief Questionnaire (FEBQ).	
FRNSW_4		Recommendation: That the development of a FSS be a condition of consent.	
FRNSW_5		Recommendation: That a comprehensive Emergency Response Plan (ERP) is developed for the site in accordance with HIPAP No.12. The findings of the FSS should inform the development and content of the ERP.	
FRNSW_6		Recommendation: That an Emergency Services Information Package (ESIP) be prepared in accordance with FRNSW fire safety guideline – Emergency services information package and tactical fire plans.	
FRNSW_7		Recommendation: That an Emergency Responders Induction Package is developed for the site in consultation with, and to the satisfaction of FRNSW prior to commissioning of the site. The package should inform first responders of site-specific features and safety measures to ensure they are able to undertake their duties effectively in accordance with agency specific Standard Operational Guidelines. The format of the Induction Package should be such that it can be readily shared across all Agencies.	

Table 4-14: City of Newcastle (CoN) Submission Responses

Reference #	Theme	Submission	Response
CoN_1	Traffic and transport	The submitted Amendment Report No. 2 has been reviewed and it is noted that no changes are proposed to the transport route from the Port of Newcastle to Nundle. On this basis, CoN has no further comments to offer on the Project.	Noted.

Table 4-15: Muswellbrook Shire Council (MSC) Submission Responses

Reference #	Theme	Submission	Response
MSC_1	Traffic and Transport – Route constraints	Use of Council local roads (as opposed to State roads) is a constraint caused by the Denman Road bridge crossing of the Hunter River (height limit restricted) and the Muswellbrook rail underpass on the New England Highway.	Noted. These constraints have been considered in the RJA Route Survey (Appendix I of Amendment Report No. 2).
MSC_2	Traffic and Transport – Cumulative Impacts	[Regarding OSOM blade movements proposed through the MSC LGA to access the Central West-Orana REZ and New England REZ] Whilst some proponents have indicated they will utilize the older style short blades, and could technically utilize the State Road Network, Council is concerned that these projects will seek a future modification for taller towers and longer blades requiring the use of local roads for transportation through the Shire. There has been no cumulative assessment of the various impacts this many OSOM movements, resulting from planned and foreseeable future renewable energy projects ... will have on the assets, resources and community in Muswellbrook Shire. A cumulative impact assessment would employ an	We note the general industry-wide concerns raised by MSC regarding use of local roads for transport of project components to the Central West-Orana REZ and New England REZ. We further note that Council's State Significant Development (SSD) Committee resolved on 3 November 2021: "Authorises staff to object to all State Significant Development (SSD) that nominates the use of local roads in the Shire for transport of components to another LGA, until EnergyCo, Transport for NSW and Department of Planning Industry and Environment find a more strategic solution to managing transport issues that is acceptable to Council." We further note that this authorisation does not relate directly to this Project but rather generally to all SSD's, and that this Project is not located in either REZ's and is well in advance of other projects proposing to connect to new REZ infrastructure in the future.

Reference #	Theme	Submission	Response
		explicit methodology to model plausible future scenarios, understand the pathways of interaction of cumulative impacts and determine and describe thresholds and limits for traffic impacts. Many proposed development timeframes for the renewable energy projects appear to occur at the same time. Council's concern is on the unsustainable use of local roads and bridges that are not fit for purpose, by numerous large-scale projects.	Noting that the Project does propose to use local roads in the MSC LGA for transport of project components, and as discussed previously with MSC, the Project has proposed a number of mitigations to prevent impact to local roads due to use by this Project, in summary: <ul style="list-style-type: none"> revising route options through MSC LGA to spread the load of traffic on local roads; commitments to assessing structural integrity of council road assets, and undertaking upgrades where required; voluntary commitment to pay a Road Usage Fee for use of local roads to provide greater certainty to all parties, otherwise a commitment to undertake dilapidation surveys on the local roads.
MSC_3	Traffic and Transport – Cumulative impacts, Safety	The public are at risk of traffic related impacts from multiple projects i.e., cumulative road closures and cumulative OSOM movements (flashing lights and safety considerations). These roads and intersections form part of the designated access to coal mines and horse studs, carry high volumes of traffic at peak times and disruption can cause significant issues for these businesses (refer to MSC submission for further detail). Coal mining occurs 24/7, with a change of shift every 10 to 12 hours, so any night time/early morning transport may impact on shift changes. Some of these roads are maintained by mining companies, and the mining operations are prohibited from using some of these roads (as terms of approvals) due to safety issues arising from poor alignment and weight limited structures.	The Project will prepare a detailed Traffic Management Plan (TMP) prior to construction in consultation in consultation with TfNSW, MSC, and other relevant roads authorities associated with the Project, to the satisfaction of the Secretary of DPE. The TMP will incorporate management and mitigation measures for construction of the Project which are outlined in Appendix B, Updated Mitigation Measures 2023. Consultation has been held with a number of businesses within the Muswellbrook LGA using the proposed transport route. This includes: <ul style="list-style-type: none"> Maxwell Underground Mine Mt Arther Mine New Hope Bengalla Mine Mt Pleasant Mine Mangolla Mine Dartbrook Underground Mine Coolmore Stud Darley Woodlands Stud Edenglassie Stud; and Blamoral Stud. These stakeholders will be consulted as part of the TMP proposed to be developed prior to any transport movements using the transport route.
MSC_4	Social and Economic Traffic and Transport Noise - Traffic	There are no direct benefits to the ratepayers of Muswellbrook Shire (e.g., Employment opportunities) and yet ratepayers are at risk of: a. Funding costs associated with the accelerated deterioration of the local road network and staff time required to create legal agreements and monitor impacts. Escorting OSOM and repair of any damage or removal and reinstallation of road furniture will come at great cost to Council; b. The inconvenience of temporary road closures. Council Officers recommend that this impact could be minimised by extra widening of corners to reduce the number of turning movements required to allow OSOM vehicles to negotiate them; c. Safety issues of encountering large numbers of OSOM vehicles on local roads (see below for Coroner's recommendations relating to Wybong Road); d. Amenity impacts for residents of traffic noise, flashing lights and other unfavourable impacts, particularly if night movements are proposed; and e. Diversion of Police resources to escort duties.	Noted. The Project has sought to mitigate the general SSD concerns raised by Council with the above commitments relevant to this Project. During preparation of the detailed TMP, the Proponent is open to further discussions with MSC relating to the effectiveness of extra widening of corners to be implemented to reduce temporary road closures. Please see response to MSC_6 below regarding commitments made by the Proponent.
MSC_5	Traffic and Transport - Safety	The Coroner has made several recommendations following a fatal car accident (decapitation) on Wybong Road between a light vehicle and an escorted prime mover. Key recommendations were in relation to OSOM travelling on narrow country roads.	The Proponent will comply with the law and any conditions of consent. The Proponent makes no comment or representation as to the merits of amending current legislation. A National Heavy Vehicle Regulator (NHVR) permit is required to be obtained for road access for OSOM vehicles along the major road network (National Routes or State Highways). Any permits under the Heavy Vehicle National Law (NSW) for the use of OSOM vehicles on the road network will be obtained prior to the commencement of OSOM vehicle transport. Pilot vehicles, transport restrictions and appropriate traffic management would be adopted to ensure safe passage from the public road network onto the site by OSOM vehicles to be used for wind farm component delivery. This will be captured in the detailed TMP to be prepared for the Project. OSOM vehicles, generally vehicles that are greater than 25 m length or 3.5 m width, will have a pilot(s) as per the road authority requirements. Extremely long or wide vehicles may require a police escort. Other requirements outlined in the TfNSW publication 'Additional Access Conditions: Oversize and overmass heavy vehicles and loads' (2020) would be followed. Refer to the TTPP response to issues raised by TfNSW in the Traffic and Transport Assessment Addendum 3 (refer Appendix C).
MSC_6	Traffic and Transport – Road dilapidation / maintenance	If approved, every project Proponent would need to enter into a Deed of Agreement and Maintenance Agreement with Council. Significant bank guarantees would be required to enable Council to undertake maintenance work to roads in the likely scenario that none of the Proponents accepts that their transportation effort caused the damage to the roads. Muswellbrook Shire ratepayers should not pay for the staff time and resources required for this.	If road dilapidation surveys are ultimately conditioned for the Project within MSC LGA, the Proponent will undertake a dilapidation survey along the final transport routes prior to commencement and following the completion of the OSOM delivery phase for construction. This survey will be provided to Council. If dilapidation surveys identify that any Council roads have been damaged as a result of Project usage, the Proponent will repair this damage. However, we note a one-off Road Usage Fee of \$70,000 upon the commencement of construction was previously offered to MSC in our letter dated 2 June 2021 as an alternative to performing road dilapidation surveys and to provide greater certainty to MSC. The fee is proposed to compensate MSC for any dilapidation which may be caused by the general use of roads within the Muswellbrook Shire by traffic associated with the Project.

Reference #	Theme	Submission	Response
			<p>Due to the volume of traffic which already uses roads within MSC LGA, it will likely be impractical to commission a dilapidation survey which can identify only that dilapidation attributable to Project traffic, noting that OSOM loads for the Project are estimated to be less than 6 trips per day on average.</p> <p>To further support this, TTPP assessed the impact of estimated Project vehicles using Thomas Mitchell Drive and concluded that the Project impact is deemed negligible in comparison to other road users (Section 8.5.3 of Traffic and Transport Addendum 2021, Appendix H of Amendment Report No. 1). Accordingly, the proposed approach of a Road Usage Fee as an alternative to road dilapidation surveys remains the Proponents strong preference to provide both parties with greater certainty, and we ask that MSC further considers this and reverts on the offer. This offer is not intended to avoid the Proponents obligation for repair if damage was made to roads by the Project that is not consistent with standard wear and tear.</p> <p>The Proponent is accepting of providing a performance bond in favour of MSC in the form of a letter of credit or bank guarantee to secure its performance of any Council Asset upgrade works or general maintenance and repair of roads.</p> <p>The Proponent will negotiate these terms with MSC in good faith following selection of the final transport routes, with such bond to be for a reasonable amount having regard to the cost of any required modification works. The bond would be provided prior to the earlier of: (1) commencement of any modification works, or (2) commencement of OSOM deliveries. Any such performance bond would be released upon completion of Project OSOM deliveries plus 6 months.</p> <p>On the basis of the Proponent offering:</p> <ul style="list-style-type: none"> o a performance bond throughout the duration of Project OSOM deliveries to protect MSC road assets; o a Road Usage Fee (in lieu of road dilapidation surveys); o a structural assessment of all drainage structures along the proposed route; and o emergency repair or maintenance commitments in the TMP, <p>It is the Proponents view that the risk to damage and repair of Council's assets during construction of the Project is well mitigated.</p>
MSC_6		Every load would need to be escorted by Council staff and regular dilapidation reports sought so that damage is identified within an appropriate timeframe and able to be apportioned to a particular Proponent.	All project loads will be transported in accordance with relevant roads authority requirements, including permits and pilot escorts as necessary. It is not considered necessary for Council staff to also escort Project vehicles through MSC.
MSC_7	Traffic and Transport – Road upgrades	Widened intersections would need to be designed to avoid other road users “cutting corners” and speeding excessively through newly widened areas.	This is agreed where necessary and will be consulted on with MSC during preparation of the detailed TMP and Section 138 permits.
MSC_8		As significant upgrades will be required to these roads, their asset value will change and Council maintenance costs will increase to reflect the new standard e.g. 8 m wide road compared to a 5.5 m wide road. Furthermore, the newly upgraded roads may encourage use by motorists who would normally access the shire via the State Road network (e.g., a short cut between Sandy Hollow and Scone).	Noted. The Proponent requests MSC to respond to its offer on 18 October 2021 with its requirements and what it is willing to accept.
MSC_9	Traffic and Transport – Cumulative impacts	<p>The Mining Industry have indicated they do not support a project-by-project approach where each Proponent seeks individual landholder agreements (mining companies own a significant amount of land on the transport route).</p> <p>Some areas of land are under long term lease agreements between mining companies and landowners. The proposed transport route will mean a permanent resumption of land as access would be required not only for the Project construction period, but also if blades needed to be replaced or more turbines are added in a staged development.</p> <p>A strategic solution to the transport of over-dimensioned equipment on local roads has not yet been proposed to ensure all issues are being captured and a practical and workable solution for Council, wind farm proponents and mining companies and other landowners is identified.</p>	The Project has obtained support for the transport route from all required private landholders through MSC LGA. A minor change to the swept path has been proposed on the corner of Wybong and Kayuga Road based on positive discussions with the landowner about the use of this land for multiple wind projects.
MSC_10	Traffic and Transport – Road Upgrades and Engagement	<p>Council's preference is also for single route option utilising a limited number of roads for all blade and tower components rather than impacting a greater number of roads including roads through residential areas:</p> <p>i. To the north via the planned Muswellbrook Bypass. Until this is constructed, Council Officers would prefer Golden Highway, Denman Road, Bengalla Link Road, Wybong Road East and Kayuga Road.</p> <p>ii. To the west via the Golden Highway.</p> <p>It is Council's preference that if local roads are used, that roads are upgraded to “purpose built” to minimise maintenance costs over the long term</p> <p>Council is eager to be involved in a strategic plan/approach so that issues raised would be adequately addressed and the objection removed. It should be noted that Council is not opposed to renewable energy development.</p>	Council's comments are noted and are taken to relate to the broader strategic industry discussions currently being held with EnergyCo, TfNSW and DPE.
MSC_11	Traffic and Transport – Engagement	<p>On 18 October 2021, the Proponent provided a 'Revised Letter of Offer to Muswellbrook Shire Council' (Revised Letter of Offer), which is shown in Appendix F of the Traffic Impact Addendum (TTPP, Oct 2021).</p> <p>Council Officers are not satisfied with the way forward proposed in the Revised Letter of Offer due to the cumulative workload & community impacts and planning issues referenced in the above sections.</p>	Responses to individual concerns raised are detailed above. The Proponent requests MSC to respond to its offer on 18 October 2021 with its requirements and what it is willing to accept.

Table 4-16: Tamworth Regional Council (TRC) Submission Responses

Reference #	Theme	Submission	Response
TRC_1	Landscape and Visual Social and Economic Traffic and Transport	Whilst Council acknowledges the sensible decision to remove the Devil's Elbow (Barry Road) bypass proposal for OSOM vehicles, Council is not convinced that this resolves the impacts associated with manoeuvring OSOM vehicles along the existing narrow local roadways. Despite the efforts to present new route options, there remains a very real environmental, cultural and visual negative impact on the existing local road network. This includes Barry Road, Morrisons's Gap Road, and now, as a result of the amended proposal, Happy Valley Road, Crawney Road and Jenkins Street (Nundle's main street). The two new OSOM vehicle route options to access the site via Crawney Road will negatively impact on the character of the Nundle Village and will transform the important idyllic tourist locality into an industrial area. The presence of OSOM vehicles within the village precinct, significant vegetation removal and under pruning and construction of "temporary" roads will have lasting impacts	Additional design work has been completed to demonstrate required upgrades to the existing road network within Nundle. This provides greater detail on impacts to the road network and is provided in Appendix C. Optimisation of this has been carried to out ensure a minimum impact to existing trees and upgrades to drainage where required. Only limited road upgrades are proposed on Barry Road, Morrisons Gap Road, and Crawney Road. Please review: TfNSW response TfNSW_2 to 5 for further detail on road upgrades and traffic impacts within Nundle. Refer to Appendix B, Updated Mitigation Measures 2023 for the key community enhancement and benefit. Also a Cultural Management Plan will be prepared in consultation with Heritage NSW and Aboriginal stakeholders.
TRC_2	Biodiversity	The vegetation loss includes stands of White Box trees with understorey where road alignments are adjusted, especially at intersections where the OSOM vehicles would be turning. The 'loop' through Nundle option includes roads that abut Forested Wetlands, Grassy Woodlands and Candidate Grasslands as identified on the NSW State Vegetation Map. Any modifications that impact these communities is considered to be very grave and need to be avoided. Existing street trees within the village will likely be removed, including those along Jenkins Street to assist the OSOM traffic volumes and the proposed new road through private property will also negatively impact on the entrance to Nundle from the west. Council's continued concern with the proximity of the wind turbines immediately adjacent to the Ben Hall's Gap Nature Reserve and Crawney Pass National Park has been recently heightened with the Ben Halls Gap Sphagnum Moss Cool Temperate Rainforest Legal Status being listed as Critically Endangered under the EPBC 1999, effective 5 October 2022. Council maintains that the impact on habitat for threatened species or woodland listed as an endangered/critical ecological community which has already occurred is unacceptable and the amended transport routes are likely to result in further land clearing adjoining road reserves and on private property.	All transport haul route options have been assessed in detail and all areas where impacts to native vegetation / habitats will occur as a result of transporting Project components has been assessed and will be offset. This has been updated in the Updated BDAR (refer Appendix F) as a result of further design refinement to the Nundle Bypass route. Tree removal has been minimised and updates to this have been provided in the revised Nundle Bypass route drawings provided in Appendix C. As the Project was determined to be a Controlled Action prior to that Sphagnum Moss Cool Temperate Rainforest TEC being listed it is not one of the Controlling Provisions. Potential impacts and mitigation measures associated with this TEC are included in Section 8 of the Updated BDAR (refer Appendix F). The Proponent has not undertaken any physical work on any part of the proposed project considered in this Development Application. Any further biodiversity impacts are considered in the Amendment Report No. 2 and the Updated BDAR (refer Appendix F). The AEMO's 2022 Electricity Statement of Opportunities (2022 ESOO) provides updated forecasts for demand and supply of electricity. The 2022 ESOO ultimately signals: A need to urgently progress anticipated generation, storage and transmission developments ... to support the energy transition underway. With the NEM expected to experience a cluster of five announced coal-fired generator retirements in the next decade, and needing resilience for potential future closures as well, the investment need is pressing and widespread across the NEM (p. 5). The Federal Government Climate Change Act 2022 outlines Australia's greenhouse gas emissions reduction targets of a 43% reduction below 2005 levels by 2030 and net zero by 2050. The Project will assist in achieving this target by providing an estimated reduction in greenhouse gas emissions of approximately 0.65 Mt CO2-e per annum. If approved, the Project could be constructed and operational before 2030, which is the year that many nations have pledged significant greenhouse gas emissions reductions relative to 2005 levels. A Biodiversity Management Plan will be prepared in consultation with BCD and for approval by DPE (refer to Appendix B, Updated Mitigation Measures 2023).
TRC_3	Heritage – Historic	There is also the potential for the OSOM vehicles to cause vibration damage to a number of significant buildings within the village where there are 14 heritage listed properties. The proposed route option through Lots 1 and 2, DP 997480 is locally heritage listed, being associated with the Peel Inn at 89 Jenkins Street. The heritage assessment for the route option which dissects the above-mentioned property states that the impacts will only be "temporary" which is assumed to be during the construction period and that future rehabilitation of the site is recommended. However, it is understood that there is likely to be an ongoing requirement to transport material to site for the life of the operation period. Therefore, Council does not agree with the "temporary" proposition, with the more likely scenario being the retainment of a road (for delivery purposes) which will therefore continue to have a negative impact on the heritage curtilage of the Peel Inn.	Appendix M of the Amendment Report No. 2 assessed the potential for cultural impacts to known and listed historic sites. A response from Heritage NSW confirmed the findings of these reports stating "The subject site is not listed on the State Heritage Register (SHR), nor is it in the immediate vicinity of any SHR items. Further, the site does not contain any known historical archaeological relics. Therefore, no further heritage comments are required." Construction of the Project is expected to take 2.5 years and, thereafter, traffic is expected to be minimal. The Proponent has already committed that upgrades that are not required permanently will be rehabilitated post construction, including any temporary gravel surfaces used for the blade routes behind the Peel Inn.
TRC_4	Traffic and Transport – Council infrastructure	This route would cross two water mains that would likely need reconstruction or protection from the impact to the weight of the vehicles. Neither main is new and the 100 mm main identified as being constructed with Asbestos Cement in the 1970's is of particular concern. The diversion will also cross the cycleway on Innes Street. It is assumed that this will not be available effectively for the construction phase and would need to be reinstated following construction. It would need to be considered whether the cycleway is physically viable if the diversion is to be used periodically in the decades to come.	Transport routes crossing water mains occur frequently in infrastructure projects of this nature. Detailed design as part of S138 approvals will consider these water mains and the Proponent commits to ensure TRC is consulted through the surveys, structural assessment and design. In the unlikely event that there is an assessed impact on these water mains, the Proponent will introduce design and construction solutions to avoid direct impacts and risk of Asbestos exposure. It is noted that the heavy OSOM loads are designed to spread weight across many axles in order to represent a similar weight across axles as existing heavy vehicles such as B-Doubles. The terrain at which the proposed blade delivery route would cross the cycle path is flat and it is expected that the cycle path will continue to be used unaffected. Blades using this route during the blade transport period, expected to be no more than 9 months, will be travelling at speeds of ~20 km/hr at this location from private road to public road and will be under both forward and rear pilot escort. No short term or long-term impact is considered likely to the cycle path and the tie-in from the private access to Innes St. Following construction, the temporary blade bypass road would be removed and rehabilitated, as it is expected to be very rare that this road would be required during the Operations of the Project. On these rare occasions the blade deliveries would be managed in the same way to ensure safety to the public. Therefore, there will be no ongoing impact to the use of the cycleway.

Reference #	Theme	Submission	Response																					
			Refer to Appendix B, Updated Mitigation Measures 2023 in which the Proponent will undertake utilities search as part of detailed design for the Project after the transport and logistics contractor is engaged and the turbine technology is selected.																					
TRC_5	Flooding	The entirety of this diversion is subject to the Flood Planning Area as identified by the Nundle Flood Study. The Nundle Floodplain Risk Management Plan (FRMP) identifies all of that land as being subject flood hazard including approximately approximate half as being subject to 'High' hazard. The Nundle FRMP also identified the depth of the potential flood as high as 1.5 m in some sections. Consequently, there is clear risk that the road will be inundated and require reinstatement at some point to provide for any future use. Additionally, the impact of the road on the flood behaviour needs to be carefully assessed to avoid increased damage to property and risk to human life.	<p>Existing elevation of the lots hosting the proposed blade bypass track are generally equivalent to the surrounding Council roads on Herron Street and Inness Street, as evidenced by approx. elevations shown in the table below. However, if there is a serious flood event in Nundle during the period of Project construction which affects the temporary bypass road, the Proponent commits to reinstate the bypass road as required.</p> <p>Further, the Proponent commits to consulting with Council during S138 approvals to ensure there is no material impact of the temporary bypass road on the flood behaviour in the event of a flood.</p> <table><tr><th>Point</th><th>Location</th><th>Elevation (m)</th></tr><tr><td>1</td><td>Oakenville Street</td><td>625.4</td></tr><tr><td>2</td><td>Herron Street</td><td>628.6</td></tr><tr><td>3</td><td>Innes Street</td><td>628.7</td></tr><tr><td>4</td><td>Back of Pub</td><td>626.8</td></tr><tr><td>5</td><td>Back of Pub</td><td>627.8</td></tr><tr><td>6</td><td>Back of Pub</td><td>628.4</td></tr></table> <p>Refer to Appendix B, Updated Mitigation Measures 2023 in which the proponent will repair or pay the costs of any damage to public infrastructure caused by the Project where required.</p>	Point	Location	Elevation (m)	1	Oakenville Street	625.4	2	Herron Street	628.6	3	Innes Street	628.7	4	Back of Pub	626.8	5	Back of Pub	627.8	6	Back of Pub	628.4
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TRC_6	Hazards – Bushfire	Council continues to hold considerable concerns regarding bushfire risk. Council is not satisfied that the steep terrain which will result in fast moving bushfires will be able to be controlled. Or, that there will be certainty that safe access for firefighting crews (ground and aerial) will be available and can be maintained. These concerns are supported by RFS advice that the turbines would be treated like any other potential hazard and therefore would by necessity be avoided, resulting in greater risk to the sensitive natural environment.	<p>The EIS considers NSW Rural Fire Service (RFS) guidelines including the aims and objectives of Planning for Bush Fire Protection (2019). It does not assess the individual design or engineering components of the turbines (or other infrastructure and very clearly identifies that the proposed development is located within a bushfire prone landscape, and that despite the mitigation measures and treatments that are put in place, bushfire risk will always remain.</p> <p>In the event that a fire does breach any containment lines and threatens the windfarm assets, it is possible that the windfarm infrastructure will sustain direct flame contact. A fast moving bushfire in this environment will not be able to be 'controlled' - this is an existing hazard.</p> <p>All access roads will be upgraded and 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 although it is noted that the access road is already located within the flame zone - this existing hazard. The upgrades will improve access along the ridge and additional water sources will be an advantage to both the local RFS and the NPWS for back burning down the slopes in advance of the fire front. There can be no guarantee with 'certainty' that safe access for firefighting crews (ground and aerial) will be available at all times.</p> <p>Refer to Appendix B, Updated Mitigation Measures 2023. The Proponent will prepare the Bushfire Emergency Management and Operations prior to the commencement of any construction works in consultation with relevant stakeholders, including local fire services, NSW RFS, NSW Fire and Rescue, NPWS, FCNSW, adjoining property owners and employees. This will provide opportunities to workshop the access requirements and specific locations and numbers of fire control advantages such as turning bays, water points, helipads and staging areas etc. It will also include an updated risk assessment which considers recent fire history within the locality and/or recent incidents of wind turbine fires in Australia.</p>																					
TRC_7	Project Description – Site suitability	Councils maintains its contention that the subject site is not suitable for a large industrial scale wind farm operation. The proposal remains inconsistent with the Objects of the NSW Environmental Planning and Assessment Act 1979 which was raised in our letter dated 25 May 2022. Council maintains the site selected to be completely inappropriate on the grounds that there is no evidence to support it can achieve “ecologically sustainable development”, promote “social and economic welfare” of the Nundle and Hanging Rock communities or promote “the sustainable management of built and cultural heritage”.	<p>The site for the Project has been carefully selected to ensure its suitability for a wind energy project and ongoing refinements have been made to the Project to minimise potential impacts within the wind farm site and on the adjoining community while delivering broad public benefits. The site is relatively isolated and sparsely populated while being within commuting distance to regional townships and major regional cities who will benefit from the increased economic activity. The strong support given to the Project from residents who live in the nearby Nundle and Hanging Rock communities demonstrates the broad community acceptance of the Project. However, it is acknowledged that some community members remain opposed to the Project and do not want a wind farm developed in the region despite the broad public benefits which it would deliver.</p> <p>Site suitability and the environmental, social and economic impacts of the Project have been exhaustively 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 Amendment Report No. 2 and this Submissions Report demonstrate that potential impacts have been avoided, minimised or mitigated as far as reasonably practicable or feasible. 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.</p> <p>The Project represents a positive addition to the local and wider NSW economy, assists the Commonwealth and NSW Governments to fulfil their targets and policies to increase renewable energy supply, reduces carbon emissions and assists in meeting energy demand and providing necessary network stability.</p>																					

Table 4-17: Upper Hunter Shire Council (UHSC) Submission Responses

Reference #	Theme	Submission	Response
UHSC_1	N/A	Upper Hunter Shire Council (UHSC) has reviewed Amendment Report No. 2 and does not have any concerns or comments regarding the amended proposed.	Noted

5. RESPONSES TO ORGANISATION AND PUBLIC SUBMISSIONS

Table 5-1 has been prepared to address specific feedback from Community Organizations and the General Public. Public submissions are generally consistent with specific feedback from Community organisations and these have been categorised by Group and Subject Matter to respond collectively.

Table 5-1 Summary of Responses to Community Organisation and Public Submissions

Group	Matter raised	Response
Biodiversity		
Newcastle and Hunter Valley Speleological Society Australasian Cave and Karst Management Association	Further detail and assessment required on the identified karst and related hydrological karst systems. The karst systems have a high potential for damage through erosion and silting from road clearing and construction from the Project.	<p>Biodiversity items associated with potential impacts to geological features of significant within the assessment areas and broader landscape is assessed in Section 3.1.6 of the Updated BDAR – Areas of geological significance and soil hazard features. The project will not result in any direct impacts to cave bat roosts and indirect impacts have been minimised through turbine relocation and removal. This was following design changes to the project that included avoiding direct impacts on cave bat roosts and creating greater separation from habitat where possible. Section 7 of the Updated BDAR provides this information. Section 8.5 provides an assessment of the prescribed impacts of the project to bats and concludes there are unlikely to be any serious and irreversible impacts to any threatened bat species. This conclusions has since been agreed to by BCS. Appendix F of the Updated BDAR is the geomorphologist assessment of geological features of significance within the broader landscape. Section 5.4.2 includes the detailed findings of additional desktop assessment, ground-truthing surveys, and geomorphological assessment of potential microbat roosts surrounding the development footprint. Refer to Appendix B, Updated Mitigation Measures 2023, for the soil and water mitigation measures that represent appropriate soil and sediment controls to be implemented for any exposed soil in stockpiles, temporary works or permanent work. Also, a Bird and Bat Adaptive Management Plan (BBAMP) will be prepared for the Project in consultation with BCD and for approval by DPE prior to the commissioning of any WTGs.</p>
	Further detail and assessment required on hydrology and soils, and the karst and cave systems are at risk of erosion and water damage through silting. This could negatively impact a number of bat species.	
	Proximity to bat habitat caves means clearing and erosion will be part of the impact in the hydrological process associated with caves and karst.	
	The bat study conducted for the EIS was only conducted over a short period of time.	<p>Fauna surveys completed for the BDAR were undertaken in accordance with NSW and Commonwealth Government guidelines. Surveys were undertaken over a total of six separate seasonal survey events between Spring 2018 to Autumn 2021. This is considered a comprehensive Survey effort and sufficient to capture seasonal variation in the biodiversity values present within the Project Area. Table 34 of the Updated BDAR provides the survey design employed and survey effort for each candidate species and demonstrates how survey effort is sufficient to meet the requirements of the BAM. Where survey effort was not sufficient and habitat for the species is present on the site, areas of habitat for these species has been mapped with assumed presence. Refer to Appendix B, Updated Mitigation Measures 2023 for the Bird and Bat Adaptive Management Plan (BBAMP) that will be prepared for the Project in consultation with BCD and for approval by DPE prior to the commissioning of any WTGs.</p>
	Concern for connectivity corridor for threatened species and local fauna / flora.	<p>Detailed survey to describe the occurrence of those items was undertaken in accordance with relevant guidelines, and potential impacts to all items listed have been assessed in accordance with the required methods. The Project design has changed to reduce impacts related to species connectivity through native flora. Changes to the Project include:</p> <ul style="list-style-type: none"> WP1 was considered a Moderate Risk turbine and its removal benefits locally occurring threatened and non-threatened fauna species including microbats, Koala, Greater Glider, as well as to approximately 2 ha of high condition PCT 1194 vegetation. Removal of this turbine location from the Project design has the direct benefit of reducing native vegetation removal, but also reduces potential connectivity impacts as the turbine was acting as an outlier on the south-western extent of the array, and the turbines now occur in a more linear arrangement in that location. between turbine WP18 and turbines WP20-22 reducing habitat connectivity impacts in an area of the wind farm where moderate condition habitats occur on either side of the ridgeline. The removal of WP19 also allows for an approximate 600 m reduction of the intrusion into intact vegetation to the south of the development footprint. the removal of turbine WP23, WP27 and WP31 substantially benefits biodiversity values utilising the habitats along this southern portion of the wind farm, both directly through a reduction in vegetation removal, and indirectly through a reduction in potential collision risk, breeding habitat disturbance, and connectivity impacts. removal of WP41 and relocation of WP35 – WP47 allowed for turbines adjacent to BHG NR to achieve a minimum 400 m spacing (WP38-WP47) and create a 1.2 km east west corridor between turbines WP40 and WP42. this Project update is considered to substantially reduce the potential for barrier effect (barriers to species movements) adjacent to BHG NR, considered a higher risk area, and across the subject land more broadly <p>The information above is sourced from the Table 52 Design Amendments and Impact Avoidance of the Updated BDAR. Further information on Connectivity of different areas of habitat including around the Project Area is available in the Updated BDAR. In Figure 4 and Figure 5, 3.1.5 Connectivity Features.</p> <p>The Proponent has made commitments in Appendix B, Updated Mitigation Measures 2023, which are reiterated 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:</p> <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.

Group	Matter raised	Response																																																										
		<ul style="list-style-type: none">○ 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.○ refer to Appendix B, Updated Mitigation Measures 2023, 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.																																																										
Community Newcastle and Hunter Valley Speleological Society Uarbry Tongy Lane Alliance Inc Hills of Gold Preservation Inc	Threat to Koala habitat noting that Koalas were listed as endangered EPBC Act on 12 February 2022.	Vegetation clearance and potential impacts to Koala have been avoided and minimised to the fullest extent possible and residual impacts will be offset in accordance with state and Commonwealth requirements. The Updated BDAR provides revised direct vegetation impacts (Refer to Appendix F):																																																										
	Impact to native vegetation, Threatened Ecological Communities, Plant Community Types, Critically Endangered Ecological Communities, BC act listed fauna species.	<table><tr><th>Vegetation condition class</th><th>2020 BDAR Area (ha)</th><th>Updated BDAR Area (ha)</th><th>% Reduction</th><th>% of mapped vegetation</th></tr><tr><td>Planted or urban vegetation</td><td>7.39</td><td>0.84</td><td>89</td><td>0.2</td></tr><tr><td>Exotic grassland</td><td>272.36</td><td>235.78</td><td>13</td><td>55.2</td></tr><tr><td>Derived Native Grasslands</td><td>30.91</td><td>39.43</td><td>-28 (increase)</td><td>9.2</td></tr><tr><td>Native vegetation – Low condition</td><td>37.11</td><td>33.64</td><td>9</td><td>7.9</td></tr><tr><td>Native vegetation – Moderate condition</td><td>73.8</td><td>63.29</td><td>14</td><td>14.8</td></tr><tr><td>Native vegetation – High condition</td><td>64.88</td><td>54.19</td><td>16</td><td>12.7</td></tr><tr><td>TOTAL</td><td>486.45</td><td>427.16</td><td>12</td><td>100.0</td></tr></table>	Vegetation condition class	2020 BDAR Area (ha)	Updated BDAR Area (ha)	% Reduction	% of mapped vegetation	Planted or urban vegetation	7.39	0.84	89	0.2	Exotic grassland	272.36	235.78	13	55.2	Derived Native Grasslands	30.91	39.43	-28 (increase)	9.2	Native vegetation – Low condition	37.11	33.64	9	7.9	Native vegetation – Moderate condition	73.8	63.29	14	14.8	Native vegetation – High condition	64.88	54.19	16	12.7	TOTAL	486.45	427.16	12	100.0																		
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Group	Matter raised	Response				
			Powerful Owl	Assessed as not present as none were observed during surveys	17.26 ha	N/A
			Sooty Owl	As above	1.99	N/A
			Barking Owl	As above	84.57	N/A
			Masked Owl	As above	16.29	N/A
			Greater Glider	N/A	36.28	N/A
			Spotted-tailed Quoll	N/A	45.62	N/A
		Total Change	-199.51 ha			
Community Uarbry Tongy Lane Alliance Inc Hills of Gold Preservation Inc	Ben Halls Gap Sphagnum Moss Cool Temperate Rainforest listed as Critically Endangered under the EPBC Act on 5 October 2022.	As the Project was determined to be a Controlled Action prior to that TEC being listed it is not one of the Controlling Provisions. Potential impacts and mitigation measures associated with the TEC are included in Section 8 of the Updated BDAR (Refer to Appendix F).				
Concerned Crawney and Timor Citizens	The size of the local Bat populations / roosts have been underestimated. Many of the roosting sites (limestone caves) are on private properties (Glenrock, Barrington, Ellerston, Barry or Timor) which have not been surveyed. Bat colonies are also in the mine shafts and in the forest. To accurately assess the real bat population volumes would require a year round study.	Fauna surveys completed for the BDAR were undertaken in accordance with NSW and Commonwealth Government guidelines with information referenced below: <ul style="list-style-type: none">Section 7 provides detail on the assessment and design process that was included to avoid and minimise impacts on biodiversity, including measures to reduce and avoid all direct impacts on cave bat roosts.the Project will not result in any direct impacts to cave bat roosts and indirect impacts have been minimised through turbine relocation and removal.Section 5.4.2 includes the detailed findings of additional desktop assessment, ground-truthing surveys, and geomorphological assessment of potential microbat roots surrounding the development footprint.Sections 5.4.2 and 5.5 includes the updated maps illustrating microbat habitat throughout the Project Area.Section 8.3.1 provides a qualitative risk assessment for bat species.Section 8.5 provides an assessment of the prescribed impacts of the Project to bats.Appendix E provides details associated with assessments undertaken in accordance with serious and irreversible impact assessment, providing further assessment of impacts to cave roosting bats.Appendix F includes advice regarding the presence of geological features of significance within the assessment area and in the broader landscape.Section 8.5 provide additional assessment of the indirect impacts associated with bat strike.impacts associated with blade strike will be managed by the preparation and implementation of a Bird and Bat Adaptive Management Plan (BBAMP). The plan will be prepared prior to operation of the wind farm and implemented over the life of the Project. Details are provided in Section 8.10.2.				
	Updated BDAR report does not identify a number of known Bat caves in proximity to the Project (e.g. Timor Belfry Cave, Helictite Cave, Main Cave).					
	Conduct a targeted survey for <i>Eucalyptus oresbia</i> in the vicinity of the transmission line route, the Devil's Elbow By-pass, Barry Road and Morrisons Gap Road	Habitat suitability within the majority of the subject land for <i>Eucalyptus oresbia</i> was assessed. It was concluded that the development footprint is not suitable to support this species due to the lack of 'very steep valleys and deeply incised creek lines with primarily south to southwest exposure (NSW BioNet DPIE 2021). Due to this habitat limitation, the species was excluded from assessment under the BAM. Notwithstanding the habitat suitability constraints, the survey effort employed would have detected <i>Eucalyptus oresbia</i> . Surveys for <i>Eucalyptus oresbia</i> were concentrated around Devil's Elbow and although found in the broader area, the species was not found to be present in the previous footprint, nor was it found to occur in the small areas to be impacted by the current footprint.				
	Confirm status of Biodiversity Stewardship Site agreements and whether they provide like for like offsets based on IBRA regions and sub regions.	Biodiversity stewardship agreements have been secured for 4 neighbouring properties. Applications are currently being completed including further surveys. These applications are planned to be lodged in mid-2023 in time for credits to be available for the construction of the Project. The stewardship sites have been selected following preliminary surveys and are expected to create like for like credits within the IBRA regions and sub-regions.				
	Confirm that stewardship sites would be located sufficiently remote from the influence of the turbines and where there is secure landscape connectivity with existing reserves.	Stewardship Sites will be located with adequate setback as agreed with the Biodiversity Conservation Trust and as part of the Stewardship site assessment process. However agreed setbacks for particularly flora and fauna species are expected to be required.				
	Adopt NPWS request to remove all turbines near Ben Halls Gap Nature Reserve boundary.	Turbine 41 has since been removed from the Project layout which was located on the boundary of the Ben Halls Gap Nature Reserve. In addition turbines 35-47 were relocated along the boundary of the reserve to increase separate distance between turbines to a minimum of 400 m and where possible 200 m from the boundary of the nature reserve This reduced the risk of barrier effects by creating a 1.2 km buffer where there was the higher chance of wildlife connectivity and reduced the 4 moderate risk of impact turbines to low risk of impact.				
Upper Peel Landcare Group Community	Concern with the proposed clearance of 447 hectares of vegetation, and 46.2ha of koala habitat for this project.	Vegetation clearance and potential impacts to Koala have been avoided and minimised to the fullest extent possible and residual impacts will be offset in accordance with state and Commonwealth requirements. During flora and fauna surveys carried out between 2018 and 2020 and over 1014 infrared motion detected camera trap nights, two Koalas were spotted in the Project Area. 7 Koalas are recorded within 10km 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 3,000ha in neighbouring nature reserves suitable for Koala relocation if found prior to construction. The Project has further committed to best practise processes for minimising the unavoidable residual direct impacts noted above including:				

Group	Matter raised	Response
		<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. 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. 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.
	Trees will not recover from the lopping required for OSOM movements	The Project requires delivery of a number of different types of wind turbine components. Blades are the longest, while tower sections and the generator (known as the nacelle) are shorter, but wider and heavier.
	Tree removal along Nundle Riverside Walkway at the Innes Street.	<p>The Proponent has considered different transport route options for these components. Changes made to the Project have avoided significant road upgrades at the Devils Elbow and Morrisons Gap Road.</p> <p>Most components can be delivered with minor proposed upgrades along the routes proposed and upgrades shown in Appendix B. This provides greater detail to minor road works required at the corner of Oakenville Street and Herron Street, and Innes Street and Jenkins Street. These works are required to facilitate safe movement of oversized equipment, while allowing existing traffic to continue to pass by.</p> <p>Two options have been considered for the transport of blades. The 'Nundle By-Pass' option would take blades across private land behind the Peel Inn and onto Jenkins Street off Innes Street. This route would address concerns raised during the 2020 public exhibition as blades would not be taken through the Oakenville/Jenkins intersection. However, while an updated design has been completed which aims to avoid impact to mature growth trees in the road corridor, this route option does require removal of 2 trees on Oakenville Street, 7 trees on Innes Street and 1 tree on Jenkins Street. While this has been optimised there remains the potential for further reduction based on final blade selection and capability of transport contractors.</p> <p>An alternate route for blades only has been proposed that would cross the Jenkins/Oakenville intersection and loop around Happy Valley Road and back onto Jenkins Street (noting all other oversize, overmass vehicles would still use the route behind the Peel Inn). While this requires the blades to travel through Nundle, it is limited to 192 movements over the course of 9 months, or an average of 5 per week. While some pruning to trees will be required, this alternate route reduces the need to remove established or new growth trees within the road corridor on Oakenville, Innes and Jenkins Street.</p> <p>ENGIE intends to continue consulting the landowners on the transport route to determine the final design intended for blades.</p> <p>The Proponent commits to consulting a local arborist with expertise in the species requiring pruning to ensure they can regrow following use of the transport route during construction.</p>
Community Hills of Gold Preservation Inc	Removal of WTG 41 and the relocation of 20 turbines does not remove the barrier effect to birds and bats returning to home roosts between the Project Area and Ben Halls Gap Nature Reserve, and does not remove the barrier effect and risk of bird and bat strikes.	<p>A detailed assessment of potential barrier effect is provided in Section 8 of the Updated BDAR (refer Appendix F). Further, the response from BCS as part of the latest Project Amendment supports the changes to the Project made to reduce impacts to birds and bat strike. The former conclusion of a 'potential significant impact' to Large-eared Pied Bat has been updated to 'unlikely' based on a lack of optimal breeding habitat and removal and relocation of high-risk turbines. It should be noted DPE BCS in its January submission agreed that there is unlikely to be any serious and irreversible impact to bat species.</p> <p>The following changes were made to the Project providing benefits in reducing impact to birds and bats:</p> <ul style="list-style-type: none"> removal of WP 41 created the greatest potential for reducing barrier effects of the turbines located near Ben Halls Gap Nature Reserve. movement of other turbines was based on increasing separation distances with BHGMR and native vegetation identified as potential habitat such that turbines were spaced 400 m apart to meet the conditions for reduced collision risk. this reduced 8 turbines to Low Collision Risk from Moderate the turbines will be shut off in conditions where higher bat activity is likely which has resulted in all turbines being considered low risk
Hills of Gold Preservation Inc	North West Local Land Services approved land clearing on Wombramurra Mountain for agricultural purposes in September 2020. Confirm if this area is included in the biodiversity credit estimates in the Amendment Report No. 2. Confirm if areas of clearing relating to the Set Aside Conservation Agreement have triggered or increased obligations under the Biodiversity Offsets Scheme.	<p>This area is included in the Biodiversity credit estimates and the Proponent has sought to avoid and minimise impacts in this area through preliminary design. The data collection for the biodiversity assessment was completed prior to the thinning referred to, and as such it over-estimates the impacts (and resultant offsets) that the Project will actually have in that location. Further avoidance will be sought during detailed design.</p> <p>Areas of clearing related to the Set Aside Conservation Agreement have not triggered or increased any obligations under the Biodiversity Offset Scheme for the Project. The Set Aside Conservation Agreement protects an area on a host wind farm landowners property for restoration and the Project is prohibited to propose any infrastructure in this area.</p>

Group	Matter raised	Response
Community	Threat to connectivity corridor for threatened species and native flora and fauna	<p>The Project design has changed to reduce impacts related to species connectivity through native flora. Changes to the Project include:</p> <ul style="list-style-type: none"> WP1 was considered a Moderate Risk turbine and its removal benefits locally occurring threatened and non-threatened fauna species including microbats, Koala, Greater Glider, as well as to approximately 2 ha of high condition PCT 1194 vegetation. Removal of this turbine location from the Project design has the direct benefit of reducing native vegetation removal, but also reduces potential connectivity impacts as the turbine was acting as an outlier on the south-western extent of the array, and the turbines now occur in a more linear arrangement in that location. The removal of WP19 results in an increase separation gap from 1 – 1.5 km between turbines in this location, to approximately 2.1 km between turbine WP18 and turbines WP20-22 reducing habitat connectivity impacts in an area of the wind farm where moderate condition habitats occur on either side of the ridgeline. The removal of WP19 also allows for an approximate 600 m reduction of the intrusion into intact vegetation to the south of the development footprint. The removal of turbine WP23, WP27 and WP31 substantially benefits biodiversity values utilising the habitats along this southern portion of the wind farm, both directly through a reduction in vegetation removal, and indirectly through a reduction in potential collision risk, breeding habitat disturbance, and connectivity impacts. Removal of WP41 and relocation of WP35 – WP47 allowed for turbines adjacent to BHGMR to achieve a minimum 400 m spacing (WP38-WP47), and create a 1.2 km east west corridor between turbines WP40 and WP42. <p>This Project update is considered to substantially reduce the potential for barrier effect (barriers to species movements) adjacent to BHGMR, considered a higher risk area, and across the subject land more broadly</p> <p>The information above is sourced from the Table 52 Design Amendments and Impact Avoidance of the Updated BDAR (refer Appendix F).</p> <p>Further information on Connectivity of different areas of habitat including around the Project Area is available in the Updated BDAR (refer Appendix F). In Figure 4 and Figure 5, 3.1.5 Connectivity Features</p>

Traffic and Transport

Hills of Gold Preservation Inc	Provide more detailed information on the proposed car park within walking distance of Nundle.	The Traffic and Transport Assessment Addendum 2 also included a scenario without a proposed car park and shuttle bus. Appendix B, Updated Mitigation Measures 2023 includes a dedicated construction car park immediately outside the Nundle town centre, as required to be prepared in consultation with Tamworth Regional Council, local landowners and community organisations as well as with TRC.
	Recognise that Nundle and Hanging Rock Village are not within RTA volume capacity ratio (V/C) Standard Level of A.	The assessment of traffic capacity was prepared in accordance with the RTA (2002) Guide to Traffic Generating Development. No issues have been raised by TfNSW relating to the validity of this assessment.
	Base increased traffic volumes on the worst case scenario without carpooling or shuttle buses.	<p>The Amendment Report No. 2 Appendix H Traffic and Transport Assessment Addendum 2 included the scenario without the car park and shuttle bus. Refer to Refer to Appendix B, Updated Mitigation Measures 2023 a TMP will incorporate management and mitigation measures for construction of the Project.</p> <p>The base case scenario in the EIS Appendix G Traffic and Transport Assessment assumed carpooling only (with a scenario showing improvements if a shuttle service was proposed) as recommended by Transport for NSW in their February 2021 submission. It is reasonable to assume that on projects of this nature with commutes similar to those distances between Nundle and Tamworth carpooling would occur. Not assuming carpooling would overestimate potential traffic and the inclusion of carpooling was updated in the Amendment Report No. 1.</p>
	Base increased vehicle movements per day in Nundle on current vehicle movements for Oakenville Road (presumably Oakenville St) at 434, plus separate counts for Barry Road and Morrisons Gap Road.	The Amendment Report No. 2 Appendix H Traffic and Transport Assessment Addendum 2 included the traffic modelling for increased vehicle movements per day in Nundle to the Project Area are provided for Oakenville Street in Figure 9 to Figure 10 for existing, construction and forecast traffic volumes and summarised in Table 6. Table 5 provides a split for the two OSOM routes through Barry Road and Crawney Road. Table 9 peak construction period assumes all traffic would go to Morrisons Gap, with analysis showing that forecast volume would not have a significant impact on the road efficiency or the volume capacity ratio during the construction period.
	Advise residents along the transport route from New England Highway and Tamworth to the proposed project area of increased traffic volumes.	<p>As referred to in the Amendment Report No. 2 Appendix H Traffic and Transport Assessment Addendum 2, the existing heavy vehicles logging trucks that create additional impact to traffic volumes as a result of the Project's OSOM movements are not significant from the New England Highway to the Project Area. The Project has committed to three new layby passing bays between the New England Highway and the project entrance to further reduce impacts of the additional wind farm OSOM transport. The OSOM vehicles would be travelling under controlled conditions with escort traffic controllers or police at slower speed. A clear representation of forecasted traffic volume is referred to in section 5.1 of the Traffic and Transport Assessment Addendum 2.</p> <p>The Proponent has undertaken significant community engagement including widely broadcast promotion of its proposal as well as opening a community information hub within Nundle. More information about ways to learn more about the project are available at www.hillsofgoldwindfarm.com.au.</p>
	Advise speed of OSOM traffic.	<p>OSOM vehicle movement would be under traffic control in accordance with the relevant regulations for transporting OSOM vehicles. Other requirements outlined in the TfNSW publication 'Additional Access Conditions: Oversize and overmass heavy vehicles and loads' would be followed.</p> <p>The TMP will include a management plan for the transportation of OSOM. This includes procedures relating to speed of OSOM traffic depending on the location and condition of the road.</p>
	Advise worst case scenario for peak construction impacts allowing for snow and rain delays.	The Proponent presented a 2 year for overall construction period in Figure 3-18 of the EIS which included construction of 70 turbines. Each of the stages of construction includes buffer for weather delays. In the event that extraordinary inclement weather occurs traffic impacts would be paused during construction down time. Additional risks surrounding OSOM loads will be considered in the TMP and locations for OSOM loads to remain until it is safe to continue will be identified in the Traffic Management Plan. Refer to Appendix B, Updated Mitigation Measures 2023 for further information in relation to the Traffic Management Plan.

Group	Matter raised	Response
	Confirm whether there are escorts for OSOM vehicles from Port to Project?	The Traffic Management Plan will include a requirement to provide escorts for the majority of OSOM loads along local roads, including police escorts for the higher risk OSOM loads, to ensure local residents have safe passage. Refer to Appendix B, Updated Mitigation Measures 2023 for further information in relation to the Traffic Management Plan.
	Estimate potential impact on informal detour roads such as Happy Valley Road and Duncan's Creek Rd as people aim to avoid construction traffic.	OSOM vehicle movements would be under traffic control for key turns along the route. The Traffic Management Plan Driver's Code of Conduct will also include a requirement that all vehicles regularly accessing the Project Area during construction are required to have In-Vehicle Monitoring Systems installed. Refer to Appendix B, Updated Mitigation Measures 2023 for further information in relation to the Traffic Management Plan.
	Directly advise landholders on potential transport routes from New England Highway and Nemingha to Project Area about increased traffic volumes.	The Proponent has undertaken significant community engagement including widely broadcast promotion of its proposal as well as opening a community information hub within Nundle. More information about ways to learn more about the project are available at engie.com.au/hillsofgold . No changes to the proposed transport impact was proposed as part of the Amendment Report No. 2. Previous changes proposed in the Amendment Report No. 1 removed the proposal for any OSOM loads to use the New England Highway from Nemingha to Nundle route. Only light and heavy vehicles have been considered in the assessment for use of this route. Traffic proposed on this route is referred to in table 4.6 of Traffic and Transport Assessment Addendum 2. Peak traffic distribution on this route is assumed at 68% of overall traffic volumes or about 71 additional movements of both light and heavy vehicles in morning peak times.
	Recognise increased traffic impacts to recreation areas; Chaffey Dam, Sheba Dams, Hanging Rock Lookout	Section 6 in Appendix H refers to the mitigation measures for reduced traffic impact and increased safety. This section applies to recreation areas such as Hanging rock. Refer to Appendix B, Updated Mitigation Measures 2023 for further information in relation to the Voluntary temporary parking restrictions to be determined in consultation with the Nundle Business and Tourism Marketing Group and Tamworth Regional Council.
	Clarify whether upgrades and environmental and first nations assessments are required of Head of Peel Rd for it to be an allocated emergency access status, and offered as potential bush fire emergency exit for Hanging Rock residents	The Head of the Peel Road was previously included in the Aboriginal Cultural Heritage Assessment EIS 2020 for assessment of the Head of the Peel Road as a proposed access upgrade. The Aboriginal Cultural Heritage Assessment EIS 2020 included consultation in accordance with the Aboriginal Cultural Heritage Consultation requirements for Proponents 2010. As Head of the Peel Road will not be used as a proposed access upgrade for the Project no further assessment is required. However it should be noted that Head of the Peel Road was surveyed by Registered Aboriginal Parties in the EIS, however, the option was removed following further consultation with landowners on this route. The Amendment Report No. 2 detailed the use of Head of the Peel Road as an emergency access road. Refer to Appendix B, Updated Mitigation Measures 2023 for further information on the consultation to be undertaken during the preparation of the Bushfire Emergency Management and Operations Plan prior to the commencement of any construction works in conjunction with relevant stakeholders.
	Confirm whether existing road pavement surface on transport route has been assessed and whether upgrades are required for construction use e.g. half of Barry Rd currently closed due to sink hole.	The existing road pavement surface on the transport route has been assessed, as referred to in the route study attached to the Traffic and Transport Assessment Addendum 2. At the time of the Route Survey the pavement of Barry Road up to Morrison's Gap Road was considered of suitable highway grade. Morrison's Gap Road is gravel and would need widening as well as upgrading to an all-weather surface. It is noted that since the Route Survey was completed the road condition will have changed and an updated route survey and dilapidation report will be completed prior to transport of components and use of roads. Refer to Appendix B, Updated Mitigation Measures 2023 for project commitments to ensure that all roads are upgraded to be suitable for transport and rehabilitated back to the condition prior to construction.
	Note that Nundle school bus contractor operates from 6.30-9.00am and 3.00-5.30pm.	Noted. Refer to Appendix B, Updated Mitigation Measures 2023 for further information to minimise conflict with school buses routes and times. The School bus operating times will be included in the TMP.
	Advise risk of asphalt "flow" downhill on the steep road and under heavy loads.	With reference to Appendix B, Updated Mitigation Measures 2023, the soil and water mitigation measures represent that appropriate soil and sediment controls will be implemented for any exposed soil in stockpiles, temporary works or permanent works. In the event that any section of road is required to be asphalted, or for any public road upgrades, the road will be constructed in accordance with Ausroads guidelines and in accordance with the NSW Blue Book. This may include installing a stable sub-base and applying a protective sealant to the surface of the asphalt, as well as regular inspections and repairs to address any damage or signs of instability. Traffic volumes will be monitored to ensure that vehicles are not overloading the road, and that traffic is regulated to prevent excessive wear and tear on the pavement.
	Confirm which of Turnbull Engineering diagrams of Morrisons Gap road boundaries is correct.	Cadastral and feature surveys along Morrisons Gap Road were completed by a registered surveyor and updated in the Amendment Report No. 1 Appendix P.3 MGR Designs. It should be noted that since these designs were completed the Proponent has removed the requirement to construct retaining walls and extent of road widening in response to Tamworth Regional Council and local resident feedback.
	Nundle Creek Bridge and Pearly Gates Bridge have not been assessed for load carrying capacity. Two Oakenville Creek bridges are not identified on Nundle Loop plans. It is not identified whether these four bridges would need to be replaced and the environmental impact to waterways.	Load carrying capacity will be assessed as part of detailed design work once the final turbine is selected and weights and dimensions are finalised. Should any bridge upgrades be required the relevant council will be consulted and a traffic management plan put in place to manage any temporary disruption. The Project commitments include making upgrades to waterway crossing consistent with: <ul style="list-style-type: none"> ○ DPI Policies and Guidelines for Fish Habitat Conservation and Management (2013); and ○ "Why Do Fish Need to Cross the Road?" – Fish Passage Requirements for Waterway Crossings (2003). Refer to Appendix B, Updated Mitigation Measures 2023 for further design mitigation measures.
Community Hills of Gold Preservation Inc	Existing road pavement on the proposed transport route from the New England Highway to the Project Area is not fit for purpose.	The condition of roads prior to use by the Project will be assessed under committed dilapidation surveys in consultation and coordination with the relevant council. Any roads pavements required to be upgraded will be completed at the Projects' cost and will improve the road surface for all users. Refer to Appendix B, Updated Mitigation Measures 2023 for project commitments in relation to public road modifications and dilapidation reports.
Concerned Crawney and Timor Citizens	Safety concerns from contract workers using poorly maintained sealed and unsealed minor rural roads.	A detailed Traffic Management Plan (TMP) will be prepared prior to construction in consultation with Transport for NSW, Tamworth Regional Council, and other relevant roads authorities associated with the Project, to the satisfaction of the Secretary of DPE. The TMP

Group	Matter raised	Response
Nundle Pony Club	Safety concerns for people travelling with horse floats and horses.	will include a range of mitigation measures to ensure safe passage of pedestrians, local residents, general traffic, and people travelling with horse floats and horses. The Traffic Impact Assessment of the EIS and Addendum reports included detail of mitigation measures which will be incorporated into the TMP. These have been collated into the Appendix B, Updated Mitigation Measures 2023.
Community	All landowners have not agreed to proposed transport impacts on their land	The Proponent has consulted all landowners required to support the transport of wind turbine components. The Proponent has been progressively reaching agreement with landowners on the transport route and will continue to progress these. Further details of final transport volumes and blade lengths will be available for some landowners awaiting this information.
Community	Traffic impacting movement of emergency services	The TMP will include a management plan for the transportation of OSOM. This will include a requirement that OSOM trucks must ensure that services vehicles including SES are given priority (refer Appendix B, Updated Mitigation Measures 2023).
Hazards		
N&HVSS Uarby Tongy Lane Alliance Concerned Citizens of Crawney and Timor	Impact to aerial firefighting efforts. Accessibility of water source for helicopter refilling to be impacted due to sitting of project infrastructure.	The EIS considers NSW Rural Fire Service (RFS) guidelines including the aims and objectives of Planning for Bush Fire Protection (2019). Despite the mitigation measures and treatments that are put in place, bushfire risk will always remain. The recommended Bushfire Emergency Management and Operations Plan must be prepared and approved prior to the commencement of any construction works in conjunction with relevant stakeholders, including local fire services, NSW RFS, NSW Fire and Rescue, NPWS, FCNSW, adjoining property owners and employees. This will provide opportunities to workshop the access requirements and specific locations and numbers of fire control advantages such as turning bays, water points, helipads and staging areas etc. The Proponent has committed to providing additional firefighting resources and trained volunteer level firefigths as part of the project operational team. The Proponent will work with NPWS and RFS to ensure that alternative water supplies are made available during construction for fire-fighting activities. Water supply will be designed to provide filling points for fire tanker units near the wind farm entrance.
Uarby Tongy Lane Alliance	No regulations or safety protocols for dealing with thermal runaway. No details on the fire suppressant systems. Environmental cost of the additional land clearing around BESS. Water supply required to put out a fire in BESS.	Table 6 of the PHA recommends safeguards against thermal runaway. As recommended in Appendix A of the PHA, the Proponent will confirm that the thermal runaway protection in the BESS meets the recommendations of NFPA 855 Section 9.3 (or equivalent). Section 3.5 of the PHA describes the fire protection for the safe operation of the BESS. Additional detail on fire protection systems will be provided once detailed engineering for the Project commences. The fire protection system will meet the requirements of NFPA 855 or equivalent. Water supply will be designed to provide filling points for fire tanker units near the wind farm entrance. A storage of 50,000 litres has been recommended by Arriscar, based on refilling six tanker units (4,000 litres) twice each although the required capacity will be confirmed in consultation with RFS.
Soil and Water		
Hills of Gold Preservation Inc	Demonstrate capacity to secure 55 ML of water for the 24 month construction period considering DPE Water and NRAR note that securing entitlement from the unregulated Chaffey Water Source will be “challenging” with less than 400 ML of issued entitlement.	Water will be obtained from sources licenced under the Water Management Act and / or under harvestable rights purchased through existing state-based allocations, and will be subject to assessment and approval by relevant regulators / referral agencies. 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"> o Council water supply, with agreement with the relevant Council (s); o extraction from an existing nearby landowner bore, with agreement from the landowner; o extraction from a new groundwater bore; and o 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, a Water Access Licence will be applied for and the appropriate environmental assessment will be undertaken including on neighbouring properties.
	Use consistent and site specific rainfall and climate data to assess erosion and hazards	Noted: Appendix B, Updated Mitigation Measures 2023 requires the Soil and Water Management Plan (SWMP) & Erosion and Project Sediment Control Plan (PESCP) to be prepared in accordance with ‘The Blue Book’ (Landcom, 2004) to assess erosion and hazards.
	Provide hydrological evidence that the proposal passes the “neutral or beneficial” test and will not cause impacts to the quality of water flowing into Chaffey and Glenbawn Dam catchments	Noted: Appendix B, Updated Mitigation Measures 2023 requires the preparation of the Biodiversity Management Plan that will include measures for the management and monitoring of surface water quality and hydrology during construction, as applicable to the protection of biodiversity values. A Soil and Water Management Plan will be prepared, outlining measures for the management and monitoring of surface water quality and hydrology during construction.
	Assessment does not 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 or from published soil landscapes which include the footprint of the development.	The disturbance footprint has been assessed as a conservative worst case. Allowance has been made for cut and fill requirements, temporary construction areas and soil and erosion control measures. A significant amount of existing internals tracks have been considered as new disturbance despite already being disturbed. There is potential to utilise these existing tracks in the final design to create further avoidance from what has been assessed.
	Further detail on batters, bench width, mass movement, stabilising effect, and dewatering to enable excavation for hard stands, turbine foundations and road construction.	Appendix B, Updated Mitigation Measures 2023 requires the Soil and Water Management Plan (SWMP) & Erosion and Project Sediment Control Plan (PESCP) to be prepared in accordance with ‘The Blue Book’ (Landcom, 2004) to assess erosion and hazards.
	Updated Mitigation Measures does not adequately address the risk of flooding within the Upper Peel Valley Catchment.	The Project will not contribute to any additional flooding risk in the Upper Peel Valley Catchment. The Project footprint was determined to impact 0.00123% of the Namoi River Catchment of which the Peel River is a major system of. The Development Footprint is within six of the Peel River Sub-catchments and represents only 0.51% of the 420 km2 sub catchment areas upstream of Chaffey Dam. Further information was assessed in the Soil and Water Addendum Chapter 5.1.1 Affected Catchment Areas. This section concludes “the “Project will not have a material impact on the Peel River and Chaffey Dam”

Group	Matter raised	Response
Concerned Citizens of Crawney and Timor	Failure to assess the impacts of the proposal on Water and Soils South of the Range, encompassing a third of the surrounding geographical area, is actually dangerous and completely unacceptable.	Noted: Appendix B, Updated Mitigation Measures 2023 requires the Soil and Water Management Plan (SWMP) & Erosion and Project Sediment Control Plan (PESCP) to be prepared in accordance with 'The Blue Book' (Landcom, 2004) to assess erosion and hazards.
Social and Economic		
Nundle Business Tourism and Marketing Group Inc	Impacts to tourism businesses at Nundle, Hanging Rock, Crawney and Timor (e.g. removal of street trees)	The updated traffic assessment concludes that all roads leading into Nundle used by the Project (notably Nundle Road and Crawney Road 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. 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 was confirmed by a local business survey conducted in 2021 which concluded the overwhelming majority of businesses along the transport route are in favour of the proposed project changes.
Hills of Gold Preservation Inc	Clarify if the wind farm site will be open to the public for tourism or recreational activities.	The Proponent and host Landowners express interest in allowing private operators, educational tours and other community interest groups access to the Project subject to agreement with host landowners, the Proponent and site safety protocols being agreed and followed.
	Provide a detailed review of the CIV addressing the 33 exclusions and modifications identified in the RTS.	The CIV valuation has been prepared by a Quantity Surveyor (Muller Partnership) in accordance with the requirements of the EP&A Act and was attached in Appendix B of the EIS.
Upper Peel Landcare Group	Object to the original promise of large employment opportunities, reduced down to just 5 ongoing jobs.	This is incorrect. The total employment created from the construction and operation of the wind farm is estimated to be: <ul style="list-style-type: none"> 607 Full Time Equivalent (FTE) jobs created across both years of construction phase. 344 FTE jobs in the construction industry 263 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 49 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 (jobs, direct and indirect value-add) during construction and operation is expected to occur in either the Tamworth Regional and/or surrounding LGAs.
Noise and Vibration		
Hills of Gold Preservation Inc	Specify outcome of Sonus's recommendation that a further nine turbines are required to be removed for noise compliance [at development application dwelling DAD_1].	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. DAD 1 has not been constructed and there is no current indication that it will be constructed. The Projects impacts to the potential amenity of the proposed DAD 1 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 and allow that the landowner to the property be given the opportunity to reach an agreement with the Proponent for these turbines to be proceed.
	Ensure greater certainty of noise assessment from wind turbine operation, transport, rock crushing and blasting for landholders neighbouring the Project Area and transport route.	Refer to Appendix B, Updated Mitigation Measures 2023 for the Noise Management Plan and Mitigation Measures. A Noise Management Plan will be prepared and implemented incorporating the mitigation and management measures outlined below: <ul style="list-style-type: none"> if any other works are required outside of the specified hours, they will only be carried out with the prior consent of the relevant authority; fixed noise sources, such as crushing and concrete batching plant, will be located at the maximum practicable distance to the nearest dwellings, and where practicable, use existing topography to block line of sight between the fixed noise source and the dwelling; given the range of factors associated with both the generation and control of blasting, in the event that blasting is necessary, a monitoring regime will be implemented to ensure compliance with the blasting criteria detailed in the Noise and Vibration Impact Assessment; and a curtailment regime will be implemented during Project operations in order to ensure the noise from the wind farm can practically achieve the noise criteria at all dwellings and under all wind speeds. The curtailment regime involves operating selected turbines in a noise reduced mode at the wind speeds where the predictions indicate that the criteria will be exceeded, as detailed in the NVIA.; 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; and operational noise monitoring will be undertaken as required to confirm compliance with project noise limits at relevant receivers.
	Specify parameters and meteorological conditions that would trigger reduced noise mode or curtailment of wind turbines.	The assessment has been based on the following input conditions, which have been widely accepted for the assessment of noise: <ul style="list-style-type: none"> weather category 6 (representing a temperature inversion and wind conditions that assist with the propagation of noise); atmospheric conditions at 10°C and 80% relative humidity (representing conditions that result in low levels of noise absorption from the atmosphere); wind direction from all noise sources to the particular residence under consideration, even in circumstances where sources are located in opposite directions from the residence (representing the absolute worst-case noise propagation from the wind); acoustically soft ground (representing the pastoral nature of the land); and,

Group	Matter raised	Response
		<ul style="list-style-type: none"> maximum barrier attenuation from topography of 2 dB(A) (representing a conservative assessment of any shielding provided by topography). <p>These conditions are considered conservative and it would generally expected that conditions would be more favourable to noise attenuation.</p> <p>Based on the predictions in the Noise and Vibration Assessment, noise reduced modes would need to be implemented at wind speeds of 8 m/s and above at certain dwellings. Table 7 of the Noise and Vibration Impact Assessment (NVIA) (Appendix E of EIS) summarises the noise criteria and the predicted noise level for the wind speeds which require selected turbines to be curtailed. Table 9 of the NVIA outlines a curtailment strategy which will be finalised post approval when the final layout and turbine model is selected. This will be included in an updated noise assessment which will be prepared for the Project based on 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.</p> <p>Refer to Appendix B, Updated Mitigation Measures 2023 for the Noise Management Plan and Mitigation Measures. A Noise Management Plan will be prepared and implemented incorporating the mitigation and management measures outlined below:</p> <ul style="list-style-type: none"> 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; and operational noise monitoring will be undertaken as required to confirm compliance with project noise limits at relevant receivers
	Check Sonus's reading of the NSW Road Noise Policy for Morrison's Gap Rd, Barry Rd, and Oakenville St clarifying whether they are Local Roads not Sub-Arterial Roads?	<p>The RTA Network and Corridor Planning Practice Notes (RTA 2008) provided classification https://roads-waterways.transport.nsw.gov.au/classification/map/index.html of different roads, and this has been adopted as follows:</p> <p>Morrison Gap Road may have been designed as a local street, but has additional traffic functions, usually serving major traffic generators or non-local traffic movements. Therefore, Morrison Gap Road is a sub-arterial road</p> <p>Barry Road may have been designed as a local street, but has additional traffic functions, usually serving major traffic generators or non-local traffic movements. Therefore, Barry Road is a sub-arterial road</p> <p>Oakenville Street is a regional road through the Nundle township to Jenkins Street. Oakenville Street may have been designed as a local street beyond Jenkins Street, but has additional traffic functions, usually serving major traffic generators or non-local traffic movements. Therefore, Oakenville Street is a sub-arterial road.</p>
	Check Sonus's measurement of residences from roads listed on pg. 12 and if the predicted noise levels at 10 m from a road within townships is accurate for those houses	All the residences in the township of Nundle are more than 10 m from the highway/main access road.
	Base recommendation for approval or rejection on final turbine selection not a sample turbine used for estimates.	The WTG model for the Project is yet to be selected, with a range of models currently under consideration. The WTG dimensions adopted as part of the environmental impact assessment of the Project are the largest of the model options being considered for the Project and a representative turbine for noise output was selected. The noise from the final turbine selection will be modelled and tested to ensure that the noise criteria are achieved.
	Confirm which NSW government agency is liable for noise non-compliance relating to construction, vibration (construction/operation), blasting, operation and traffic.	NSW Environment Protection Authority through an Environment Protection Licence (EPL) under the Protection of the Environment Operations Act 1997.
	Clarify whether NSW Road Noise Policy criteria for "Local Roads - Existing residences affected by additional traffic on existing local roads generated by land use developments" applies to Morrison's Gap Rd, Barry Rd and reassess transport noise at houses within 10 m of roads.	<p>The RTA Network and Corridor Planning Practice Notes https://roads-waterways.transport.nsw.gov.au/classification/map/index.html (RTA 2008) provided classification of different roads, and this has been adopted as follows:</p> <ul style="list-style-type: none"> Morrison Gap Road may have been designed as a local street, but has additional traffic functions, usually serving major traffic generators or non-local traffic movements. Therefore, Morrison Gap Road is a sub-arterial road Barry Road may have been designed as a local street, but has additional traffic functions, usually serving major traffic generators or non-local traffic movements. Therefore, Barry Road is a sub-arterial road Oakenville Street is a regional road through the Nundle township to Jenkins Street. Oakenville Street may have been designed as a local street beyond Jenkins Street, but has additional traffic functions, usually serving major traffic generators or non-local traffic movements. Therefore, Oakenville Street is a sub-arterial road.
	Expansion of the existing FCNSW quarry will create additional noise impacts (crushing and blasting) for nearby residents.	<p>Noise and vibration from the expansion of the existing FCNSW quarry have been assessed in Appendix F Noise and Vibration Study of the Amendment Report No. 2.</p> <p>Based on the predictions, the relevant noise and vibration criteria will be achieved under conditions most conducive to noise propagation at all dwellings on the basis that the turbines will be operated in accordance with a specific operating strategy and construction activities (including the temporary quarry and traffic) will be managed in accordance with the recommendations within this report. Crushing and blasting has been considered as part of this assessment. Conditions most conducive to noise propagation include influences from:</p> <ul style="list-style-type: none"> sound power levels of each individual noise source; the locations of noise sources; separation distances between noise sources and residences; local topography; influence of the ground; air absorption; and, meteorological conditions. <p>The assessment has been based on the following input conditions, which have been widely accepted for the assessment of noise:</p> <ul style="list-style-type: none"> weather category 6 (representing a temperature inversion and wind conditions that assist with the propagation of noise); atmospheric conditions at 10°C and 80% relative humidity (representing conditions that result in low levels of noise absorption from the atmosphere);

Group	Matter raised	Response																																	
		<ul style="list-style-type: none"> wind direction from all noise sources to the particular residence under consideration, even in circumstances where sources are located in opposite directions from the residence (representing the absolute worst-case noise propagation from the wind); acoustically soft ground (representing the pastoral nature of the land); and, maximum barrier attenuation from topography of 2 dB(A) (representing a conservative assessment of any shielding provided by topography). 																																	
Landscape and Visual																																			
Hills of Gold Preservation Inc	Identify turbine removal for landholders without agreements and inconsistent with Visual Performance Objectives of Wind Energy Visual Assessment Bulletin.	5 turbines were removed from the Project with dwellings located to the south of the Project with increased distances to the nearest turbines. This is shown in Figure 3-1 of the MLA 2022 report attached the Amendment Jan 2022. A further turbine was removed in the November 2022 Amendment however this was not determined to have a material impact. No further turbines are proposed to be removed and the Project has been assessed against the Wind Energy Visual Assessment Bulletin. The Project has committed to provide affected neighbours with access to a Neighbour Benefits Sharing program and visual screening. Visual screening assessment has been completed and will provide reduced impacts.																																	
	Provide the community with an accurate depiction of how the private road will visually impact the Hanging Rock landmark.	The Devils Elbow private road bypass has been removed from the proposed project. Minor modifications are proposed to improve the safety for vehicles accessing the Project along the Barry Road and through the “Devils Elbow”.																																	
Heritage																																			
Hills of Gold Preservation Inc	Assess the major adverse impact of the proposed development on the setting and curtilage of the multiple listed heritage items within the Nundle township and surrounds, including natural heritage items the Hanging Rock and Yellow Rock.	Appendix M of the Amendment Report No. 2 assessed the potential for cultural impacts to known and listed historic sites. A response from Heritage NSW confirmed the findings of these reports stating “The subject site is not listed on the State Heritage Register (SHR), nor is it in the immediate vicinity of any SHR items. Further, the site does not contain any known historical archaeological relics. Therefore, no further heritage comments are required.” Construction of the Project is expected to take 2.5 years and thereafter traffic is expected to be minimal. The Proponent has already committed that upgrades that are not required permanently will be rehabilitated post construction.																																	
Flooding																																			
Community Hills of Gold Preservation Inc	Construction of raised private roads causing flooding along Herring Street, Jenkins Street and properties adjoining the river.	<p>Existing elevation of the lots hosting the proposed blade bypass track are generally equivalent to the surrounding Council roads on Herron Street and Inness Street, as evidenced by approx. elevations shown in the table below. However, if there is a serious flood event in Nundle during the period of Project construction which affects the temporary bypass road, the Proponent commits to reinstate the bypass road as required.</p> <p>Further, the Proponent commits to consulting with Council during S138 approvals to ensure there is no material impact of the temporary bypass road on the flood behaviour in the event of a flood.</p> <table> <tr> <th>Point</th><th>Location</th><th>Elevation (m)</th></tr> <tr> <td>1</td><td>Oakenville Street</td><td>625.4</td></tr> <tr> <td>2</td><td>Herron Street</td><td>628.6</td></tr> <tr> <td>3</td><td>Innes Street</td><td>628.7</td></tr> <tr> <td>4</td><td>11/DP1124681 (Back of Pub)</td><td>626.8</td></tr> <tr> <td>5</td><td>4/2/DP758798 (Back of Pub)</td><td>627.8</td></tr> <tr> <td>6</td><td>9/DP1118984 (Back of Pub)</td><td>628.4</td></tr> <tr> <td>7</td><td>8/DP250813 (South of Innes St)</td><td>628.1</td></tr> <tr> <td>8</td><td>2/4/DP758798 (South of Innes St)</td><td>627.9</td></tr> <tr> <td>9</td><td>5/DP794661 (West of Herron St)</td><td>626.3</td></tr> <tr> <td>10</td><td>Riverbank (Peel River, South of Innes St)</td><td>624.0</td></tr> </table> <p>The Proponent will repair or pay the costs of any damage to public infrastructure caused by the Project where required (Refer to Appendix B, Updated Mitigation Measures 2023).</p>	Point	Location	Elevation (m)	1	Oakenville Street	625.4	2	Herron Street	628.6	3	Innes Street	628.7	4	11/DP1124681 (Back of Pub)	626.8	5	4/2/DP758798 (Back of Pub)	627.8	6	9/DP1118984 (Back of Pub)	628.4	7	8/DP250813 (South of Innes St)	628.1	8	2/4/DP758798 (South of Innes St)	627.9	9	5/DP794661 (West of Herron St)	626.3	10	Riverbank (Peel River, South of Innes St)	624.0
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Engagement																																			
Hills of Gold Preservation Inc	Consult with Nundle Business Tourism and Marketing Group Inc regarding proposed restricted parking signage for construction workers.	On 4 May 2021, a meeting with members of this group was held with the Proponent to discuss concerns affecting businesses in the Nundle and Hanging Rock area, particularly focused on impacts of traffic and transport and existing tourism operators. Restrictions on parking was discussed. Further, a member of the CCC who represents this community organisation has been in attendance at all CCC meetings in which the Project, including parking restrictions, has been discussed.																																	
Concerned Citizens of Crawney and Timor	Lack of consultation with the Timor and Crawney community, with specific mention in to communities affected by amended route options.	The changes proposed to use Crawney Road relate to the portion of Crawney Road to the north of the Crawney Pass. The inclusion of the FCNSW quarry expansion reduces the potential for use of the StoneCo quarry within Timor/Crawney area which had previously caused concerns with residents in the area. Residents in the Timor/Crawney communities have been informed about the community information hub open sessions and have had updates sent via email and hardcopy newsletters.																																	

Group	Matter raised	Response
Upper Peel Landcare Group	Lack of Indigenous Land Use Agreement.	<p>The Project is currently working with the Native Title Gomeroi Applicant on a funding and engagement deed to support the process of entering into an ILUA for the Project.</p> <p>A presentation was given to the Nungaroo LALC on 27 June 2022 and discussions have taken place with the Gomeroi Native Title applicant group representatives. The Proponent asked for two representatives from both the Land Council and Native Title group accompanied the Project team on a site visit and walkover as part of the Amended CHAR. Both groups have advised they remain supportive of working with the Proponent with a commercial agreement to be developed with Nungaroo and an Indigenous Land Use Agreement (ILUA) to be entered into with the Gomeroi Applicant.</p> <p>A First Nations Open Day was held on the 12 November 2022 at the Hills of Gold Wind Farm Community Hub in Nundle, Local Aboriginal elders attended from Nundle and Hanging Rock Buses were provided to anyone who needed to travel from Tamworth and Quirindi to Nundle, where a project update and morning tea were provided at the Hills of Gold Wind Farm Community Hub..</p> <p>The Project team presented the proposed amendments to the Nungaroo LALC at their meeting on 5 December 2022. The meeting also focused on the specifics of an offer from the Project to Nungaroo LALC that would form the basis of an Aboriginal Land Agreement for Crown Lots that are under an Aboriginal Land Claim.</p>
Project Description		
Hills of Gold Preservation Inc	Assess whether WP 50 has been relocated onto the Crown Land and WP 47 into State Forest.	<p>The site details for WP 50 indicate that it is not located on Crown Land:</p> <ul style="list-style-type: none"> ○ Lot 2 DP 1171688 ○ Easting: 325871.96, Northing: 6504010.96 <p>The site details for WP 47 indicate that it is not located on State Forest land:</p> <ul style="list-style-type: none"> ○ Lot 48 DP 753722 ○ Easting: 326887.11, Northing: 6502787.84

6. PROJECT JUSTIFICATION AND EVALUATION

Since lodging the EIS, the Proponent has continued to consult with community members, community organisations, councils, and relevant government agencies. Some key amendments relate to input from:

- Tamworth Regional Council (TRC) relating to the Devil' s Elbow bypass road and upgrades for retaining walls on Morrisons Gap Road;
- Biodiversity, Conservation & Science Directorate (BCS) relating to potential impact to four microbat species at risk of serious and irreversible impacts (SAIL), potential barrier impacts to fauna relating to turbine spacing and the potential for owl habitat;
- NPWS relating to aerial firefighting capabilities;
- Transgrid relating to operational efficiency and maintenance of the transmission line network;
- Construction contractor' s relating to optimised road, turbine, and substation infrastructure locations, and transmission infrastructure type;
- Crown Lands feedback on options to use traveling stock route reserves for access to the wind farm;
- Quarry consultant on a potential hard rock quarry opportunity nearby the Project; and
- Community concerns about traffic volumes along Jenkins Street between Oakenville and Innes Street, and the broader local and regional road network generally.
- In summary, the Project has been refined and amended to address submissions and materially reduce potential impacts by:
 - Removing the construction of Devil' s Elbow bypass road and potential impacts to the Black Snake Gold Mine curtilage, which is a key concern of TRC;
 - Removing the requirement for retaining walls along Morrisons Gap Road, and reduce traffic along Morrisons Gap Road which is a key concern of TRC;
 - Optionality for the siting of the substation and BESS (and associated ancillary works including batching plant and temporary compound) closer to the Crawney Road alternative transport route to facilitate easier access for maintenance during operations and to minimise the extent of road upgrades in final design;
 - Increasing the separation distance between turbines on the boundary with the Ben Halls Gap Nature Reserve, improving biodiversity outcomes;
 - Creating a 1.2 km buffer through the removal of WTG 41 to reduce bird and bat barrier effects and in response to NPWS aerial firefighting concerns;
 - Providing greater certainty to the proposed turbine curtailment strategy for potential impacts to threatened bat species; and
 - Optionality of reducing general Project traffic and haulage by trucks through the township of Nundle due to the spreading of traffic across two main access routes, as well as the potential significant impact reductions to the broader local and regional road network through sourcing material from an existing FCNSW quarry identified in proximity to the Project (9 km north of WTG 69).

The Project, as amended, has been carefully designed and sited to minimise impacts in consultation with the local community and relevant landholders. While, as with all wind farms projects, there are some inevitable impacts associated with the Project as outlined in the EIS, Submissions Report, Amendment Report No. 1, Amendment Report No. 2, and this Submissions Report, these impacts have been carefully considered for effective and viable mitigation measures to avoid as much as possible during construction and operation. These updated mitigation measures have been adopted as additional commitments to the Project amendments to demonstrate further intent to reduce impacts and ensure that none of the impacts of the Project are unacceptable.

The Project aligns with international, Commonwealth and NSW Government policy and strategic vision. The Project will:

- Support the transition being undertaken in the energy sector away from a centralised system of large fossil fuel generation, towards a decentralised system of widely dispersed, renewable energy production;
- Help contribute to meet increasing energy demand, provision of dispatchable energy through the proposed large scale BESS which will assist in managing ongoing electricity demand peaks;
- Provide necessary alternative electricity production given the forecasted retirement of coal-fired power stations;
- Avoid risks to the supply of power arising from the need to expand the electricity network prior to constructing further renewable energy projects in the region;
- Contribute to GHG emissions avoided in the order of 654,400 tonnes per annum, supporting Australia's recent commitments of net zero emissions by 2050;
- 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 the first half of 2023;
- Contribute materially to NSW and Commonwealth renewable energy targets;
- Deliver economic benefits to regional and local communities, including:
 - material direct investment, with the Project expected to include a minimum capital expenditure of \$332 million (within the domestic economy) with ongoing operational expenses 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 (Tamworth Regional Council, 2020);
 - material employment, with the creation of 615 FTE jobs through both years of the construction period, and 76 FTE jobs during the operation (across professional, scientific and technical industry sector) and 16 site based jobs for the life of the Project;
 - providing a diversified income stream for rural landholders and neighbours through payments to host landholders and the Neighbour Benefit Sharing Program;
 - further 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.

The site for the Project has been carefully selected to ensure its suitability for a wind energy project and ongoing refinements have been made to the Project to minimise potential impacts within the wind farm site and on the adjoining community while delivering broad public benefits as outlined above. The site is relatively isolated and sparsely populated, while being within commuting distance to

regional townships and major regional cities who will benefit from the increased economic activity. The strong support given to the Project from the majority of residents who live in the nearby Nundle and Hanging Rock communities demonstrates the broad community acceptance of the Project. However, it is acknowledged that some community members remain opposed to the Project and do not want a wind farm developed in the region, despite the broad public benefits which it would bring.

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 Amendment Report No. 2 and this Submissions Report demonstrate that potential impacts have been avoided, minimised or mitigated as far as reasonably practicable or feasible. 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 represents a positive addition to the local and wider NSW economy, assists the Commonwealth and NSW Governments to fulfil their targets and policies to increase renewable energy supply, reduces carbon emissions and assists in meeting energy demand and providing necessary network stability.

The amendments made to the Project 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.

The further assessment carried out has confirmed the overall public benefits of the amended Project in light of this, the Project is considered to be in the public interest.

7. REFERENCES

- ERM. (2020). *Hills of Gold Wind Farm Environmental Impact Statement*. Environmental Resources Management.
- ERM. (2021). *Hills of Gold Wind Farm Submissions Report*. Newcastle, NSW: Environmental Resources Management Australia Pty Ltd prepared for Hills of Gold Wind Farm Pty Ltd.
- ERM. (Jan 2022). *Hills of Gold Wind Farm Amendment Report*. Environmental Resources Management.

APPENDIX A UPDATED PROJECT DESCRIPTION

APPENDIX B UPDATED MITIGATION AND MANAGEMENT MEASURES

APPENDIX C TRAFFIC AND TRANSPORT ASSESSMENT ADDENDUM 3

APPENDIX D ARDG RESPONSE TO DPE WATER

APPENDIX E BIOSIS TECHNICAL NOTE

APPENDIX F UPDATED BDAR

APPENDIX G SUBMISSIONS REGISTER

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