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Date 4th December 2022

Hills of Gold Wind Farm Amended Application (SSD – 9679)

Submission in **opposition** to the whole proposed HOGWF. With referenced to the Amendment Report No2 dated 7th Nov 2022. The proposed windfarm clears large areas of native vegetation, which is habitat to both vulnerable and endangered species of fauna and flora. The benefits of this proposed windfarm does not stack up against the environmental damage caused. Hence the proposed HOGWF should be relocated to another site that has historically been cleared for grazing.

1. The proposed windfarm involves the clearing of 447ha of vegetation with severe ecological consequences to threatened and endangered species of flora ad fauna. This is totally unacceptable.

These greatly impacted communities and species include;

- 17 Plant communities
 - 2 State –Listed Threatened Ecological Communities
 - 2 Nationally-listed Critically Endangered Ecological Communities
 - 10 State –listed BAM (Biodiversity Assessment Method 2020) species credit species
 - 5 Nationally –listed threatened fauna
2. There is also a very high collision risk to protected avifauna such as bats and raptors. The studies undertaken so far for the HOGWF are far from adequate. There is the need for much more in-depth studies of bats in the area, including bat roost and maternity sites, bat movements, including feeding and seasonal movements between various caves and mine sites. These studies must be undertaken over a wide area and locations, over at least a full year if not longer to determine the overall pattern of bat movements. Why has this not already been undertaken? The studies undertake up-to-date for the HOGWF are very cursory and undertaken at just a few sites and over a short periods of time. There should be a banding study and tracking over a considerable period of time.
 3. Studies on the internet indicate through surveys of 46 windfarms across the UK, found that pre-construction acoustic bat surveys, which form part of proposed wind farm Environmental Impact Assessments, are poor predictors of bat casualties at wind farms (Lintott et al. 2016).

Please address the above issues. A response to these issues would be greatly appreciated.

Regards,

Katerina Fulton