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

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

Some issues relating to the proposed location of wind turbines.

- The reported advantages of relocating 20 wind turbines (WTGs) **have no material benefits**, despite the claimed benefits to the environment, bushfire management, visual amenity, flora and fauna.
- Engie's applications – (EIS, January 2022 Amendment Report and the current November Amendment Report 2022) – seek approval to relocate any or all turbines up to a 100 metre radius. This in affect means that if approved the HOG Wind Farm can relocate the turbines closer together, closer to threatened ecosystems and closer to National Park boundaries. Hence the latest HOGWF amendment to move turbine locations by a couple of hundred meters can be largely overridden if approved as they can move them back to almost the same location they originally proposed. Overall the majority of turbines will have a substantial detrimental impact of flora and fauna, including threatened and endangered species and echo systems.
- According to the November 2022 HOGWF amendment there are still 11 turbines located adjacent to BHGMR. This is unacceptable. The NPWS in February 2022, asked for the **removal of all turbines bordering BHGMR** as they put at risk aircraft fighting bushfires and feral animal control in the National Park. Also NPWS request the removal of these turbines as there is greatly increased chance of bird and bat strikes in this area. Removal of these turbines would help protect the Threatened Ecological Community BHGMR Sphagnum Moss Cool Temperate Rainforest. The EPBC Act has now included the Sphagnum moss cool Temperate Rainforest in the critically endangered list.
- The turbines WTG 31, 32 and 33 are in breach of the Upper Hunter Shire Council (UHSC) DCP, which requires a development to be 460 m from a boundary. The UHSC requested the removal of these turbines in March 2021. In response to the UHSC, WTG 31 has been removed and WTG 32 has moved closer to the BHGMR (205m from boundary) and 33 remains (217 m from boundary).
- The turbine WTG 50, was previously relocated and now appears to have been relocated onto Crown Land according to the Engie's map.

Please address the above mentioned issues and respond in writing regarding each of these issues.

Regards,
Kenneth Smith