

Director –Energy Assessments
Development Assessment
Department of Planning and Environment
Locked Bag 5022
PARRAMATTA NSW 2124

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

RESPONDER: Mavis Joyce Plunkett
POSITION: Resident
ADDRESS: Crawney Station 1969 Timor Crawney Road Crawney NSW 2338
PHONE: 0409 375 990
EMAIL: jjplunkett@bigpond.com

I am **objecting** to the Hills of Gold Wind Farm Amended Application (SSD – 9679).

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

REASONS FOR OBJECTION:

We write as owners of a large parcel of land in the Upper Hunter called Crawney Station which adjoins Wallabadah Reserve to the West and Crawney Pass National Park to the right and is included within the Environmental Impact Statement of the Proposed Wind Farm Project. Our land parcel is fairly substantial at approximately 4855 acres. We believe that the main homestead on the property is identified as NAD_72 within the plan documents.

We would also like to object to the Hills of Gold Wind Farm (SSD – 9679) project at Crawney on the following grounds:

1. LOCATION:

The site for Engie's Hills of Gold (HOG) Wind Farm remains a major objection to this development. This is not about the value of wind farms as a natural resource and alternative energy source, but about the considered choice of an appropriate location to build a large industrial complex, such as this wind farm. This site is completely unacceptable on many levels.

The site Engie have proposed:

- Sits on top of the ridgeline of the Liverpool Ranges – part of the Great Dividing Range, with elevations of 1100m - 1400m, and with a 230 wind tower installed, the overall height atop the Range will be over 1600+ m.
- Has a Development footprint sitting on the boundaries of the Crawney Pass National Park, the Ben Halls Gap Nature Reserve (BHGNR) as well as the Ben Halls Gap State Forest.
- Threatens the connectivity corridor for threatened species.

- Consists of steep slopes on the southern side (the Crawney and Timor Communities side) of the Development that reach over 50% gradient in sections and have a high risk of erosion and dispersion (land slides) which have recently occurred on the Crawney Pass Road, as testament.
- Will involve clearing 447ha of vegetation with profound ecological consequences.
- The required clearing that will severely impact 17 Plant communities; 2 State –Listed Threatened Ecological Communities; 2 Nationally-listed Critically Endangered Ecological Communities; 10 State –listed BAM (Biodiversity Assessment Method 2020) species credit species; 5 Nationally –listed threatened fauna; collision risk to Protected avifauna.
- Is the source of 14 primary water courses, which are the life blood of the communities, who live in the area.
- is comprised of soils that are of a Class 7/8 which are categorised as “extremely low capability land; limitations are so severe that the land is incapable of sustaining any land use apart from nature conservation. There should be no disturbance of native vegetation. Class 8 land includes precipitous slopes (greater than 50%) and cliffs, areas with a large proportion of rock outcrop or areas subject to regular inundation and waterlogging”.

2. SIZE OF PROJECT AND CHANGES

The size and scope of this HOG Wind Farm changes with each Report iteration.

- 64 wind turbines with 56 red illuminating lights on top of the Great Dividing Range
- increase in the project area impact from 8315 ha in the EIS to 8732 ha in this Report.
- Increase in Development Footprint from 300ha in Report 1 to 447 ha in this Report 2.
- Additional alternate transport route of 5.8 kms along Crawney Road as potential access route to the Development Footprint + an additional 6.1km of farm tracks to be upgraded.
- Widening of the Transmission Line route easement to from 60 m to 90m between the current and new substation locations, and subsequent clearing impacts.
- Increase in size of the BESS and substation to 11.09 ha.
- Increasing size of Switching station footprint from 2 ha to 4 ha.
- Option to use quarry inside the Hanging Rock State Forest and increase its site by 13.2 ha and increase extraction mining from its current less than 30,000 tonnes per annum to 500,000 tonnes per annum.
- Increase in new monitoring masts from 5 up to 10 and their associated hardstand areas.
- 40 kms of internal road network – all 5.5 m wide + 1.5 m shoulders on each side, making this 40km x 8.5 kms wide of clearing and bulldozing.
- 13 August 2021 Report on vegetation under transmission lines (E.6 P 390) states an estimate of approximately 193,000 square metres of vegetation clearance, based on a 20 km length Transmission line with 4 m of vegetation clearance – Report states that TransGrid previously use a clearance of 7.5 m for 330kV lines.

3. TRANSPORT ROUTE CHANGE FOR OVER SIZE/OVER MASS (OSOM)VEHICLES TO USE CRAWNEY ROAD

Crawney Station is on Timor Crawney and stands to be impacted greatly with excess traffic both during anticipated production and planning stages, and further more if the project proceeds.

- There are three proposed options within this Report to access the Project area– this adds to the previous 2 iterations we have had to scrutinise in both of Engie’s prior reports. This in itself should be obvious that the site location is not suitable for such a large industrial development as they cannot yet find a road with the capabilities or suitability to access the Project.
- Also it goes to the credibility of Engie that we have had to endure 2 years of their inability to provide any definitive information to be assessed upon – the previous options were objected to as unviable and then dumped. But yet again Engie are given another opportunity when indeed, the whole project should have should have been rejected on the basis of the site’s unsuitability.
- It is almost impossible to comment on which Option we, the concerned public, is supposed to be assessing in this Report.
- If Local Land Services (LLS) has already said Option B is not recommended because this would be a second road through the reserve, which contravenes the Section 75 of the LLS Act - not to mention the environmental impact of closing Option A and building a greenfield access road - why is Option B even in this report?
- The 3 Options are either on Crown Land Reserves, reserved for Travelling Stock Routes OR are subject to the Gomeroi Native Claim Title Claim and an Aboriginal Land Claim, both currently undetermined. The land is zoned Environmental Conservation under the Tamworth Local Environment Plan (LEP).
- There are also no details on the Western Connector Road which will transverse from the new Crawney Road optional route to the ridgeline. There is no engineering report, no environmental impact cost on this steep sloping vulnerable terrain.
- Table 6-2 on page 16 shows all Options have unacceptably High impact on Threatened Ecological Communities (TECs) and on a Nationally listed threatened fauna species - the Booroolong Frog - and all 3 Options should be immediately rejected.
- There is between 20%-49% of High condition impact to the Critically Endangered Ecological Community (CECC) Box Gum Woodland, in addition to the area being habitat for the Booroolong Frog.
- Engie’s claim that the Option A access site occurs “furthest from known records of the Booroolong Frog” is their hopeful way no one will suspect this means it is still within the area of this species and therefore must be counted as impacting on Nationally Listed Threatened status.

4. ENVIRONMENTAL IMPACT AND THREATENED ECOLOGICAL SPECIES

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

- The Crawney Park NP itself is part of a wider network of conservation reserves located on the Liverpool Range (of the Great Dividing Range) that includes Coolah Tops, Murrurundi Pass and Towarri NPs and Ben Halls Gap, Cedar Brush, Wallabadah and Wingen Maid Nature Reserves.
- These all form part of a regional corridor providing habitat connectivity along the Liverpool range and is also located within the broader Great Eastern Ranges Initiative conservation corridor.
- The Geology, Landscape and Hydrology section (P 5) found within the Crawney Pass National Park Community Conservation Area Zone 1 Plan of Management (adopted by the Minister in August 2019) states:

“The main threat to soils is extreme rainfall events especially following an intense bushfire that removes vegetation. Major soil erosion may also lead to reduced water quality in the catchment. The protection of the water quality is also important to protect the Booroolong Frogs that occur in the Park”

- This Plan tables 13 threatened native animals recorded in or within 2 kms of the Park. This is wholly within the Development footprint of the HOG Wind Farm.
- Engie’s Biodiversity Assessment Report 1 (P 13-19) states “...there will be certain unavoidable impacts if the project is built” and “...there will be an overall ecological impact in delivering the Project”.
- It is unacceptable that this project will involve clearing 447ha of vegetation with profound ecological consequences
- The HOG Wind Farm is assessed as impacting the following:
 - 17 Plant Community Types
 - 2 State Listed Threatened Ecological Communities (TECs) – a) the White Box – Yellow Box – Blakely’s Red Gum Grassy Woodland and Derived Native Grassland (Box Gum Woodland, Critically Endangered) and b) the Ribbon Gum – Mountain Gum – Snow Gum Grassy Forest/Woodland (Endangered).
 - 2 Nationally –Listed Critically Endangered Ecological Communities (CEEC) – a) the White Box – Yellow Box – Blakely’s Red Gum Grassy Woodland and Derived Native Grassland (Box Gum Woodland and b) Threatened Ecological Community Ben Halls Gap Nature Reserve Sphagnum Moss Cool Temperate Rainforest.
 - 10 State –listed fauna BAM species credit species – 8 mammals, 1 amphibian, 1 reptile
 - 5 Nationally –listed threatened fauna – Koala, Large-eared Pied Bat, Greater Glider, Spotted-Tailed Quoll, Booroolong Frog.
 - Protected Nankeen Kestrel, Brown Goshawk and Wedge-tailed Eagles.
- Koalas are now an officially endangered species. Engie’s HOG Wind Farm will be clearing 46.2 ha koala habitat.
- The Matters of National Environmental Significance (MNES) in their Significant Impact Assessment on Engie’s project amendment in Jan 2022 stated, that for the vulnerable Koala “...the proposed works have the potential for a significant impact on the species, due to the removal of greater than 20 hectares of habitat... The removal of 36.44 hectares of native

vegetation...has the potential to impact the species due to the removal of habitat available to the local population". So here will be 10 months later and with an even larger clearing of koala habitat of 46.2 ha (10 hectares more!)

- Impacts from the HOG Wind Farm will result from native vegetation removal, bulk earth works, roads access, vibration, vegetation clearance, reduction of habitat connectivity, fragmentation of vegetation, turbine strike and barotrauma.
- Table 6-4 page 16-17 shows the ongoing Project Amendments still leave 190.55ha of Direct Native Vegetation Impacts as a result of this Wind Farm. Of this 61.6% is considered to be Native Vegetation of a moderate to high condition (117.48ha).
- In February 2022 NPWS have requested the removal of all turbines bordering Ben Halls Gap National Reserve to protect bird and microbats as well as to ensure the use of fixed wing aircraft to fight bushfire and avoid burning the Threatened Ecological Community Ben Halls Gap Nature Reserve Sphagnum Moss Cool Temperate Rainforest.
- Of great importance is that on 5th October 2022, the EPBC Act upgraded the Threatened Ecological Community Ben Halls Gap Nature Reserve Sphagnum Moss Cool Temperate Rainforest to endangered. This occurred prior to Engie's Amendment Report but they have failed to acknowledge the significance of this change.
- Engie has removed 1 WTG (41) and retained the 11 still bordering the BHGMR so all threats to the environment in this section of the Development remain.

5. WATER

- The only part in this Amended Report 2 that speaks to soil and water is in regards to their proposal to utilise the quarry inside Hanging Rock State Forest.
- It is telling that Engie have chosen not to respond in this Amended report to the submissions objecting to their assessments of the soils on the ridgeline and surrounding areas, where the WTGs will be constructed.
- None of Engie's previous reports on the wind farm Project has taken any account of site specific snow and rainfall volume and velocity received within the Project area – contributing to the saturation of the soil (and subsequent slow release of water by springs); potential mass movement and run off and sedimentation of the river systems.
- Engie's Soil and Water Addendum Report confidently states: "...the Development Footprint on the ridgeline only directly impacts first order ephemeral watercourses, primarily tributaries of the Peel river" This is inaccurate and denies the reality that at least 13 WTGs are located on the Eastern fall end within the catchments of the Barnard River and Pages Creek – WTG 69, 70, 46, 47, 20, 24, 25, 26, 28, 29, 30, 32, 33.
- The Pages and Perry's Creeks and tributaries feeding the Isis River have not been even mentioned or assessed in any way in any of Engie's Reports.
- DPE Water and the Natural Resources Access Regulator (NRAR) note there is no assessment of accessing an existing or new bore to confirm water supply availability and securing entitlement for this project.

- Two independent reports by Dr Robert Banks were commissioned by the Hills of Gold Preservation Inc (HOGPI) which were damning in their review of Engie's assessments. Dr Robert Banks' review (referenced above in section under soils) cites:
 - No Comprehensive Water Cycle Strategy (CWCS) has been provided
 - No mention of keeping soil pathogens separate from separate catchments
 - No mention has been made of wash down area and sterilisation facility between catchments and sensitive areas
 - There is no assessment of permanent runoff effects.
 - There is no mention, let alone any assessment, of the impact that snow melt has on supercharging catchments with runoff.
 - There is no account of site specific snow and rainfall volume and velocity received within the Project area – contributing to the saturation of the soil (and subsequent slow release of water by springs); potential mass movement and run off and sedimentation of the river systems.

6. BUSHFIRE

In the past few years we have experienced severe fire (Wallabadah Fire 2019/2020) on our property. This caused a significant amount of damage, the effects of which will be felt for many years. There were significant impacts to fencing and related infrastructure as well as to the vegetation and tree line. We believe that Wind Farming can contribute to the potential of fire with the oils and lubrication used for the turbines. These can be a hazard in a heatwave, which are regularly felt in the upper hunter. We have seen fires caused by grass on a car exhaust on a hot day, which is an indication of how quickly something can start. Furthermore, the following apply:

- Aerial fire fighting is still seriously compromised under the HOG Wind Farm project. Aerial fire fighting remains at the pilot's discretion of perceived safety – the most reliable and highest water sources and landing area are unavailable due the siting of infrastructure.
- This Amended Report under 6.6 page 29 begins with a Disclaimer by Engie that despite mitigation, bushfire risks remain and that infrastructure is in area of direct flame contact.
- In fact 39 of the 64 turbines – 61% - lay in potential direct flame contact, as does 40% of the transmission line poles. In this same section Engie reference the "...steep slopes and existing fire history within the adjacent National Park estates".
- It should be obvious that when another bush fire hits this area it will be unable to be contained if this Wind Farm development is in situ and the vast of amount of fuels and oils kept on site will wreak utter destruction.
- Engie have removed 1 turbine (WTG 41) claiming this has solved the aerial bush fire issue. This will hardly ensure that all aerial fire fighting capacity can occur – as planes try to manoeuvre through the remaining 63 turbines on the ridgeline. I again ask you to consider that Engie can move any and all WTGs 100 m radius thereby making any certainty of assessing this Report, as impossible.
- Engie also have noted in this same section the following: *"It is important to note that the maintenance of the full width of the transmission line easement including reduced fuel loads beneath transmission lines will continue to be the responsibility of the asset owner and must meet industry standards."*

7. AMENITY AND POLLUTION

Crawney Station and all surrounding farms will experience a severe loss of amenity for ourselves, staff and both the cattle and wildlife, as well as the ongoing pollution both Noise and Environmental pollution:

- We are in a location that is set to potentially be exposed to <30Db of noise. While this isn't a huge number, put into perspective the number of turbines on a quiet and still night and you potentially hear the "whomp-whomp-whomp" rather than the crickets. Over time, the one point of contention on wind turbines is constantly the rhythmic noise which it creates and the ensuing health or stress related issues which may result. Not only on humans, but the wildlife and predominantly our cattle.
- Not only are the wind turbines visual and noise pollution, but they will contribute to the environmental pollution of the surrounding areas. Oil from the turbines will potentially spill on the surrounding land, and cause pollution to both the adjoining lands and Ben Halls Gap Nature Reserve. These lands are the catchment for many creeks and waterways including the Hunter and Barnard Rivers. We do not want to see the local creeks polluted which feed our livestock, let alone the pollution carried downriver to cause problems elsewhere.
- We are concerned about the noise and traffic pollution which will result from years of construction of the turbines and related infrastructure and access roads. The roads are already quite dangerous and winding, and the options for cars passing by trucks is limited and dangerous at best. There will be significant dust and noise to the east of our property where the main Timor Crawney Road runs. As has happened in the past, our station employees have had to use farm machinery to winch and upright cars which had lost control on these roads. This puts the onus on the locals to assist where before there was significantly less traffic and reduced risk. This is a safety concern to all the residents of the area who may need to access Nundle or even more so, Tamworth.

SUMMARY:

We have a harmonious natural landscape currently in Crawney. It provides for an idyllic rural life. If the wind turbines are installed, they will be a serious blight on the landscape, and cause impact to the health and amenity of both humans and animals, damage to our local ecosystems and creeks as well as significant loss to our property value. It may also contribute to the risks of fire and pose a safety risk to the users of the roads and adjoining farms that will be used to access and build the infrastructure.

We are opposed to installing the Hills of Gold Wind Farm.

Regards,

MJ Plunkett

Mavis Joyce Plunkett
Owner and Resident



Photo 1 View of Crawney Pass from Crawney Station.



Photo 2 Portion of the mountainous view from the homestead verandah