Additions points of concern not addressed in proponents recent amendments:

Bird and Bat traps:

Although the proponent asserts the monitoring masts are temporary in nature and required for testing and commissioning purposes only, layman logic would suggest to me the numerous guy wires used to brace and secure these structures look like the perfect apparatus to kill or injure a flying bird or bat, not unlike a wire fence only more lethal due to the elevation of the guy wires.



Photo courtesy WIRES

I am also assuming as these would be used in the construction phase the protection of this fauna would not be covered by the wishfull administrative control known as the Bird and Bat Management Plan?

As a precautionary measure these testing masts should be prohibited from being located near any known bird and bat areas, particularly the proposed turbines on the BHGNR boundaries.

Presumptuous and gung ho road construction:

As the 3 access route options from Crawney Road appear to be of a concept design only, I hold little confidence that the proponent has demonstrated that the proposed access is feasible and constructable.

Mankind is very ingenious and capable of very technical construction, however technically possible does not always translate to financially possible. I draw the consent authorities attention to a local road that has been totally impassable for approximately 18 months. The Willow tree to Merriwa Road (MR 358). Please see the linked ABC article.

https://www.abc.net.au/news/2022-10-26/merriwa-to-willow-tree-road-funding-returned-budget/1 01577600



Photo ABC website supplied Dave Layzell

The MR 358 is constructed in very similar terrain and soil type to the proposed HOGWF project area and catastrophically failed from engineering shortcomings after a period of wet weather some 18 months ago. This road was built to withstand regular B double truck traffic, so one could assume it is of a similar standard that would service a wind farm construction site.

I have little concern for the well being of the proponents folly, however I do have great concern that a roadside silt fence is incapable of containing a road failure as exhibited above. Should a similar road failure occur there is a high probability of an extremely contaminated load of turbid water flow into the local creeks and tributaries. These conditions could be catastrophic for the aquatic wildlife, particularly the Booroolong Frog.I therefore question the suitability of the site to host such a road given the similarities.

Proponent continues to not represent the modelled job projections to the community:

Despite numerous opportunities for the proponent to answer a direct question from members of the community on:

"How many operational jobs will there be for Nundle?"

The standard answer is 16 full time jobs. This talking point is further asserted in the propaganda newsletter (PR polished) distributed to community members and any media interviews I have witnessed.

I draw the consent authorities attention to page 75 of SGS Socio Economic Report App R Jan 2022 with the following quote.

"As a result, the operational phase would be likely towards the lower estimate of 12 jobs. Of which it is likely 10-20% would be in Nundle, 30-40% in the surrounding LGAs and the balance in the rest of NSW. "

If I am generous to the proponent and say 20% of 12 jobs = 2.4 and I round up to 3.

3 permanent jobs for the Nundle area instead of the proponents frequently touted 16, is somewhat less. The proponents own report asserts this could be as low as 1 job permanent job!

If you ask most of the local project supporters if 1 - 3 permanent local jobs was the expected outcome from a billion dollar project, I think most would be somewhat disappointed and question the value of the projec.

It is a disgrace that this blatant lie is allowed to be perpetuated by the proponent in an attempt to gather local support and disappointing the consent authority appears to not demand the proponent correctly communicate the facts when relaying this information in newsletters and statements to the community.

Given the clear evidence of misrepresentation of the job modelling, what other facts is the proponent misrepresenting?