



NEWCASTLE AND HUNTER VALLEY SPELEOLOGICAL SOCIETY INC.

P.O. Box 15
Broadmeadow 2292
N.S.W. AUSTRALIA
Date 12-12-22

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)*

The Newcastle and Hunter Valley Speleological Society **strongly objects** to the proposed **Hills of Gold Wind Farm Application (SSD – 9679)** due to its location and the potential threats it poses to the local environment and wildlife, including the karst and cave systems.

The Environmental Impact Statement (EIS) does not present any assessment or study of the impact of this project 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 this project.

In a submission by Jodie Rutledge, a member and published author of the Newcastle and Hunter Valley Speleological Society, specific concerns were raised about the western access road from the Crawney - Nundle Road adjacent to the Crawney Karst and caves systems. Mrs. Rutledge states that seven caves are currently known to exist in the area, containing many features of significant geo-heritage value and providing habitat for cave-adapted fauna and roosting havens for bats.

The EIS also lacks any detailed and scientific assessment of the hydrology and soils, and the karst and cave systems are at risk of erosion and water damage through silting. This could negatively impact the bat species, including the threatened large-eared pied bat, little pied bat, eastern coastal free-tailed bat, little bent-wing bat, large bent-wing bat, greater broad-nosed bat, and eastern cave bat.

Additionally, the bat study conducted for the EIS was only conducted over a short period of time and lacks credibility in providing an overall picture of bat movements over a full year.

Furthermore, the proposed wind farm still does not adequately address the previously raised issues and continues to pose a threat to the connectivity corridor for threatened species and local fauna/flora. The Liverpool Ranges are home to 17 plant community types, 2 state-listed threatened ecological communities (TECs), and 2 nationally-listed critically endangered ecological communities (CEECs). The presence of the wind farm would pose a significant threat to these communities, including the critically endangered Box Gum Woodland. In addition, the Liverpool Ranges are home to 10 state-listed fauna BAM species and 5 nationally-listed threatened fauna, including the Koala, Large-eared Pied Bat, Greater Glider, Spotted-Tailed Quoll and Booroolong Frog. The protected Nankeen Kestrel, Brown Goshawk and Wedge-tailed Eagles also call the Liverpool Ranges home.

We also have concerns that experienced NSW Rural Fire Service volunteers are also raising the issue that the presence of the wind farm on the Liverpool Ranges poses a threat to aerial firefighting efforts. The most reliable and highest water source for helicopter refilling will not be available for aerial firefighting due to the proposed infrastructure and turbines requiring water for helicopter refilling from a much lower altitude. This will require a considerable climb and longer turnaround time, compromising the effectiveness of firefighting efforts in the area.

The proposed wind farm also poses a threat to Koala habitat. In the Significant Impact Assessment on the project's past amendment in January 2022, it was stated that 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 new amendment still includes the clearing of 46.2 ha, continuing to significantly threaten the local Koala population.

In conclusion, the Newcastle and Hunter Valley Speleological Society strongly objects to the proposed "Hills of Gold Wind Farm" due to its potential impact on the karst and cave systems, threatened species, and local fauna/flora. We urge the decision-makers to consider these concerns and reject the proposal.

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

Kind regards,

Melissa Hadley

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President

Daniel Burt

A handwritten signature in blue ink, appearing to read 'Daniel Burt', with a long, sweeping flourish extending upwards and to the right.

Secretary