



Director - Energy Assessments
Planning and Assessment
Department of Planning, Industry and Environment
Locked Bag 5022
Parramatta. NSW 2124

Date: 21.1.21.

TO WHOM IT MAY CONCERN

RE: HILLS OF GOLD WIND FARM APPLICATION NO. SSD 9679

- I am attaching my submission to the above mentioned development application
 - I hereby declare that I object to the Hills of Gold Wind Farm proposal ID no. SSD 9679
 - I would like my personal details withheld
 - I have not made any reportable political donations in the previous 2 years
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21/1/21 - [REDACTED] - resident of Timor/ Crawney

I would like to object to the application – Hills of Gold Windfarm – ID SSD9679 for the following reasons

Lack of consultation with the Timor community

According to the Hills of Gold Windfarm EIS, the properties that would be affected by the project were consulted/ informed in 2018. I, like many other Crawney and Timor residents, only found out in November 2019. Yet, many of the Crawney/ Timor property owners would see the turbines from their houses. The EIS states that an overview of the communities affected were contacted – only 11, initially. This is not a fair sample of opinion and only involved property owners on the Nundle side of the range and not residents of the Crawney/Timor valley

No plans for decommissioning and rehabilitation in the EIS

There is no Decommissioning Environmental Management Plan (DEMP) in the Hills of Gold Windfarm Project EIS, so when the turbines no longer perform adequately, they could be left in place. The project owners, Engie, has already stated that they plan to sell the project, once up and running. They could sell to a shelf company, with no commitment to 'clean up' .

A DEMP was required for the following windfarm projects

Sapphire Windfarm, New Gully Range Windfarm (2016), Collector Windfarm (2012) and Epuron – Rye River Windfarm, were required to provide a detailed plan of dismantling of equipment, recycling and sale of equipment, cost of decommissioning, rehabilitation of land and restoration of the landscape. No such detail is provided in the Hills of Gold Windfarm Project. There is no mention of a DEMP in this project

In 21.1 it states that the EMS is to be supplied at a later date, but the EMS overview of what the company will cover to meet its EMS requirements, still doesn't mention any plans for decommissioning

EIS -1.3.10 Post Construction Site Rehabilitation

....'EMS to be prepared prior to construction'

EIS -21.1 'An EMS will be developed to provide the overall framework for environmental management during construction, operation, decommissioning and rehabilitation of the project' There is no mention of decommissioning plans in the EMS overview.

Destroying endangered species habitat.

The 50 hectare area of the main project has been identified as either having or potentially housing 13 critically endangered, endangered and vulnerable species of animals. The study states the following species are 'likely present and could be significantly impacted' The species list includes the vulnerable Koala, the endangered Regent Honey eater and Swift Parrot, the Booroolong Frog, and the endangered species of flora -the Blakely's Red Gum, Forest gum, White Box, Snow gum and Scribbly Gum

I have seen koalas on my property, at Timor, and other neighbours, along the Crawney valley, have sighted koala on their properties, over many years

I have some of the same species of trees as the project site – 'Koala trees' -Blakely's Gum, white box, grey gum, swamp mahogany and scribbly gum, so there is likelihood of koalas in the project area

The Australian Koala Foundation states on their website page 'If these particular trees are present, then the answer to application for development is NO'.....'unless (you) can prove your actions will be benign to the landscape'

In a time when new koala protection measures are being 'boosted' nationally, the clearing of even potential koala habitat goes against the new protection measures. The government has called for further environmental assessment of the Hills of Gold Wind Farm project, under SEARS, the NSW Koala Protection Policy 2019-2020, aligning with SEPP 44 Koala Habitat Protection. Koala numbers, nation-wide, are reported as to have been reduced by 71% , mainly due to the loss of many animals in the devastating fires of 2019, as well as habitat loss.

I have viewed the project site and the primary landowner has removed 200 hectares of bushland, already, much illegally, including an area of potential koala habitat and a stand of snow gums, in preparation for the project

The new government protection measures stress the importance of keeping established koala habitat. Off-setting 'established' environments - potential koala habitat, to somewhere else is not good enough. . Off-setting land doesn't duplicate the ecological system

Inadequate assessment of the effects on groundwater

Another concern is that the Hills of Gold Windfarm EIS doesn't adequately assess the impact of clearing on groundwater, nor the impact of accessing groundwater via bores or surface water There is a detailed description of stream orders, but no mention of groundwater studies

For property owners in Crawney and Timor, this is a crucial consideration. Spring water supplies water for stock as there is not permanent water in the Isis. Springwater outlets in the valleys are very 'fragile' With underground water rising to the surface and then going underground, along the Isis and Perry's Rivers, the complex cave and Karst systems, well documented by the Newcastle Speleologists, there is no evidence of any studies on groundwater in the EIS. However, there is mention of potential problems

EIS -16.3.3 -Table 16.5 - Potential Impacts on Soil and Water, potential impacts may be

'over-extraction of surface water or groundwater resulting in reduced environment flows.....and impact on water dependent systems'

In 16.5, Mitigation Measures, there is no mention of water access monitoring or reduced access to bore water in drought. Mitigation Measures relate to topsoil management and avoiding watercourse disturbance. This does not mitigate the damage to underground river systems.

1.2 million litres a month will be required during the construction phase. How will this impact on the groundwater systems?

Inappropriate location

The National Wind Farm Commissioner, Andrew Dyer, stated in his Annual report of 2017, that

‘hilltops, while optimum for capturing wind, can lead to greater impacts – visual amenity, noise, shadow flicker and access roads. ‘There may be opportunities to select and prioritise wind projects’...which better balance the likelihood of acceptance, by the surrounding community’

Have assessments been carried out on adjoining cleared farmland? The environmental impacts are sure to be far less, and even transport access to the project would require less clearing of trees, as is required in this project. There are many windfarm sites in NSW, which have required minimal clearing, as they were constructed primarily, on agricultural farmland

Summary

This application should be rejected because the site is unsuitable. The project requires extensive clearing, for access and construction, has the potential to impact negatively on endangered species of flora and fauna and the potential to negatively affect water systems. Clearing has been allowed to commence

The EIS is inadequate and fails to include appropriate studies and on groundwater and required plans for decommissioning the project, through DEMP and EMS and there has been a lack of consultation with affected communities