



Our ref: DOC21/52601

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

Dear Sir/Madam,

**Re: Hills of Gold Wind Farm – Environmental Impact Statement**

National Parks and Wildlife Service (NPWS) provides comment here on the development application for the above windfarm proposed to occur on land adjacent to Ben Halls Gap Nature Reserve (BHGNR) and Crawney Pass National Park (CPNP). There are several areas of concern that need to be considered in determining the EIS/development application.

The primary focus for NPWS is to protect the natural and cultural values of NPWS estate and to ensure the proposal does not significantly impact NPWS's ability to manage its lands consistent with the objectives of the *National Parks and Wildlife Act 1974* (NPW Act).

There are several issues requiring further clarification, additional information and/or assessment. A summary of NPWS's key issues is outlined here, with detailed comments regarding the EIS provided in Attachment 1 further below.

- It is understood that no activity related to the proposed project is to take place in BHGNR/NP or CPNP.
- Biodiversity, Conservation and Science Directorate of Department of Planning, Industry and Environment is providing a full assessment of the Biodiversity Development Assessment Report.
- Appropriate setbacks are required of wind turbines (WTGs) from BHGNR and CPNP to minimise potential impact of blade strike on birds and bats.
- The EIS impact assessment for aviation concentrates on commercial aviation and fails to adequately address potential impacts on NPWS aerial operations using both fixed wing and rotary aircraft over and around the adjoining reserves. This includes firefighting, aerial pest control and survey work. These operational impacts need to be fully assessed by the proponent and adequate setbacks applied between WTGs and the park boundary.
- Similarly, the assessment of potential electromagnetic interference on radio transmissions focusses on commercial transmissions and fails to consider any impacts on NPWS and emergency services VHF radio communications in the area. While the potential might be slight, this needs to be assessed. If approved, the development consent should provide for the proponent to rectify any issues should they arise. Any impacts in this regard will be a key safety issue for NPWS and emergency service personnel working in this remote area.

- Head of the Peel Road and Morrisons Gap Road are on or near Crown Road reserves, for which we understand there are related applications for closure to facilitate the development. Due to terrain, the tracks in use deviate from the legal road reserve. Consistent with existing Crown road closure protocols, we require a formal easement benefiting NPWS access over the tracks in use as part of the approval process and Crown road closures. NPWS has legal access to BHGMR and BHGNP via these Crown Roads. The establishment of the easement needs to be a condition of consent if the development and road closures are approved.
- It is assumed that the subject property will not be publicly accessible; otherwise there is potential impact of traffic and illegal park access due to the upgraded Morrisons Gap road and its proximity to BHGMR. To mitigate potential impacts, the proponent should be required to fence along the western boundary of BHGMR, including the cleared encroachment on park west of the existing fence-line. In addition, if any problems develop, we recommend that the proponent contribute to additional signage.
- There is a statement in the Executive Summary and elsewhere that the greatest bushfire risk relevant to the proposal, is from potential fire spread from “adjacent properties and national park estate” towards farm assets in the area. This is both inaccurate and inappropriate. Over the ten years to 2018 for fires on NPWS estate statewide, about 23% started off-park, while only 10% of fires escaped park boundaries.

If you have any questions regarding any aspects of this submission, please contact me on 02 6538 5301, or via email [anthony.signor@environment.nsw.gov.au](mailto:anthony.signor@environment.nsw.gov.au).

Yours sincerely



**ANTHONY SIGNOR**

**Manager – Barrington Tops Area  
Hunter Central Coast Branch  
National Parks and Wildlife Service**

Contact officer: ANTHONY SIGNOR  
02 6538 5301

### Attachment: NPWS submission on Hills of Gold Wind Farm Environmental Impact Statement and appendices

The National Parks and Wildlife Service (NPWS) has identified several key matters that require further consideration. These are listed in the following table.

NPWS comments on Hills of Gold Wind Farm Environmental Impact Statement and appendices			
EIS section	Page	Issue – including details as to why this is an issue for NPWS	Changes recommended by NPWS
<b>Biodiversity</b>			
Appendix D	3	1500m buffer around footprint includes a significant portion of both BHGMR and CPNP, yet very few survey points were undertaken within this buffer, and only 100m into BHGMR.	Conduct a robust survey within the 1500m buffer.
Appendix D	73-74	Weather conditions at Quirindi Post Office were used. Murrurundi Gap weather conditions are closer to those experienced in the higher parts of the survey area. The difference in temperature between Quirindi and higher elevations should be noted. Sub-zero temperatures are regularly experienced during winter. Why wasn't data from the Meteorological Masts located at the site used?	Provide a more accurate assessment of weather conditions at higher elevations during the survey.
Appendix D: Table 21	136	Booroolong Frog – known from Barnard River in BHGMR, Wombramurra Creek (close to CPNP) and a tributary to the Isis River in CPNP.	Sediment controls to be in place close to origin of potential sediment to prevent soil movement in the landscape and impacting on streams.
Appendix D		Ben Halls Gap Sphagnum Moss Cool Temperate Rainforest Endangered Ecological Community occurs adjacent to the proposed project. It is vulnerable to sediment entering the streams due to soil disturbance in track construction. This was identified as an issue in meetings with the proponent and has not been addressed in the BDAR.	Incorporate Ben Halls Gap Sphagnum Moss Cool Temperate Rainforest Endangered Ecological Community in the BDAR assessment, with appropriate mitigating measures.
Appendix D 5.3.2	153	Refers to survey locations being shown on Figure 9. Figure 9 is not included in the document.	Supply Figure 9.

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EIS section	Page	Issue – including details as to why this is an issue for NPWS	Changes recommended by NPWS
Appendix D	Site map and location map Page 10 (no page no.)	The ridgeline (watershed) is shown in the wrong place. This means O&C and a number of WTGs SW of park drain into park, intersects with headwaters of Brayshaws Creek and Ben Halls Gap Nature Reserve Sphagnum Moss Cool Temperate Rainforest Endangered Ecological Community. Based on this information, there is potential for sedimentation to impact on these creeklines. With correct information, the project area impacts on the Brayshaws Creek catchment, as discussed with the proponent prior to release of the EIS.	Correct the map, and develop mitigating measures to prevent sediment impacting Brayshaws Creek and Ben Halls Gap Nature Reserve Sphagnum Moss Cool Temperate Rainforest Endangered Ecological Community.
Appendix D	Site map and location map Page 11	Site maps reference DPIE, 2020. This is not included in Reference list.	Include in Reference list.
<b>Soils and Water</b>			
Executive summary	xiv	It is claimed that there is a low-moderate risk of soil erosion in the majority of the Project Area and that a standard suite of erosion and sediment controls may be adopted in most areas. However, some of the area is on steep slopes which has a higher risk of erosion and consequent sedimentation of streams.	It is recommended that a standard suite of erosion and sediment controls <b>must</b> be adopted, especially in steep areas.
Table 21-1	351	Soil and water	Specify that no sediment is to drain into CPNP or BHGMR/NP.
<b>Transport and traffic</b>			
Map F3-1	No number	Access to the permanent Operations and Maintenance facility is via a track immediately west and adjacent to BHGMR, accessed from Morrisons Gap Road. This presents a risk of illegal entry to BHGMR by staff, contractors or the public.	<p>To mitigate this the proponent should securely fence along the western boundary of BHGMR. NPWS recommends that the fencing plan excludes use of barbed wire in fencing (at least on top and bottom strands), given its impacts to fauna and associated impacts to park values.</p> <p>If required, the proponent should contribute to additional signage to alert people that it is NR.</p>

NPWS comments on Hills of Gold Wind Farm Environmental Impact Statement and appendices			
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Table 5-1	92	The <b>Transverse Track</b> is referred to in a number of places throughout the document, but it is not labelled on any maps.	Label Transverse Track on relevant maps.
		<b>Access during construction</b> – NPWS potentially requires access 24/7, for example for bushfire response and other emergencies	If access is going to be restricted, appropriate notice should be given and alternatives arranged.
<b>Weed management</b>			
Appendix D 8.3.4	251	Disturbance from weeds, pests and pathogens: NPWS endorses the need for mitigations for these issues to be addressed in a Biodiversity Management Plan (BMP).	Biodiversity Management Plan needs to include eliminating weeds that germinate following soil disturbance before they set seed. A protocol for dealing with weeds that encroach into BHGMR or CPNP from the proposed project should be developed. Provide draft BMP documents to NPWS for review prior to implementing.
<b>Aviation</b>			
13.1.4	250	EIS States: "... the location and height of wind turbines and wind monitoring towers should be provided to landowners so that, when asked for hazard information on their property, the landowner may provide the aerial application pilot with all relevant information."  This is not proactive in addressing potential safety issues. The information should be provided to all fire authorities and emergency services in suitable GIS format on an ongoing basis through the construction phase. Emergency services need to have the information pre-populated in operational maps when responding to incidents.	Change the wording to "... the location and height of wind turbines and wind monitoring towers will be provided to landowners so that, the landowner may provide the aerial application pilot with all relevant information. This information, and a description of the infrastructure, will be provided in suitable GIS format to all fire authorities and emergency services in suitable GIS format on an ongoing basis through the construction phase."
Appendix J	18	Details for aerial firefighting around WTGs are vague. The existence of WTGs reduces flexibility in responding to wildfires.	Operational guidelines regarding water-bombing setbacks from WTGs should be developed prior to any fires occurring in the landscape and distributed to fire authorities.
Appendix J	19	Figure 7 has a dam labelled "Dam used in bushfires". The main dam used in bushfires is east of WP26 at 31° 37' 47"S 151° 8'29"E.	Correct Figure 7.
<b>Fire management</b>			
		Fire management.	Include a statement that there will be no expectation of additional hazard reduction or other works on neighbouring lands including National Parks and Nature Reserves.

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Appendix J	36	<p>Fire history directly impacting the Project Area does not include the Caves Fire (2009-10). A number of lightning ignitions south of Liverpool Range in Timor burnt north up the hill and crossed into the Peel Valley.</p> <p>During the 2009-10 Caves Fire there was a re-ignition of an agricultural burn on Head of the Peel property which is also missing from the fire history.</p>	Include these fires in Table 5.1 under the Fires directly impacting the Project Area heading.
Appendix J	16	NPWS acknowledges that improvement in the road network will be positive for firefighter access. NPWS supports the proposal to construct all tracks to NSW RFS Fire Trail Standards.	
Appendix J	10	Proponent suggests further consultation with NPWS and RFS to ensure appropriate mitigation measures are in place if water supply from Nycooma dam is not available.	<p>Include a timeframe for this to be completed – for example, if Nycooma dam is not going to be available.</p> <p>Report this to Liverpool Range and Tamworth BFMCs prior to each fire season.</p>
Appendix J 6.2	63	<p>Strategic Fire Advantage Zones: Appendix J claims that the land east of WTG40 – WTG44 is zoned as SFAZ. This is incorrect as it is Land Management Zone (LMZ).</p> <p>NPWS supports the establishment of an SFAZ west of BHGMR.</p>	Correct Appendix J to say: The National Parks' land located to the east of WTG 40 to WTG 44 is mapped in the Ben Halls Gap National Park Fire Management Strategy as a Land Management Zone. SFAZs within the reserve are 2 – 4 km east of the WTGs.
<b>General comments</b>			
	17 (i)	Refers to DECC which is outdated.	Replace with DPIE (Department of Planning, Industry and Environment).
	25 (E.1)	Map shows BHGMR shown as NR.	Correct this.
Section 12.6.3.		We acknowledge and support the training of drivers to respect private property and farm gates.	NPWS reserves and other public land should be included in any training as well as private property.
		Staff and contractors should be made aware of restrictions on domestic animals in NPs and NRs and that we regularly bait the area using 1080 poison.	Staff and contractors should be discouraged from bringing their animals to work in the proposed Project Area.