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- Fauna surveys
- Ecology of birds
- Impact assessment
- Review & editorial
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## COMMENTS ON THE HILLS OF GOLD WINDFARM PROPOSAL, NUNDLE, NSW

I am an ecologist affiliated with the discipline of zoology (School of Environmental and Rural Science), University of New England, Armidale. I have visited Ben Halls Gap Nature Reserve and Crawney Pass National Park.

I am aware of and fully endorse the submission made by Mr Phil Spark on the inadequacy of the Biodiversity Development Assessment Report (BDAR) relating to this project. I accept Mr Spark's view that the BDAR is flawed and poorly prepared, and there is a mismatch between the BDAR and EIS with respect to assessment of certain fauna species.

Installation of turbines adjacent to or too close to the conservation estate (Ben Halls Gap NR and Crawney Pass NP) would risk compromising their primary purpose, i.e. Nature conservation. Clearing of intact treed habitats creates CO<sub>2</sub> emissions, which runs counter to the purpose of renewable energy sources. Forest or woodland should therefore not be cleared for siting of renewable energy generation and associated infrastructure.

Among further actions or investigations required, before a fair decision on the proposal can be reached, include the following:

- a biodiversity field assessment of the western access (Access B from Crawney Rd across Crown land and requiring creation of a 5 km access road – Western Connector Rd and infrastructure on Governor's Shelf);
- removal of turbines adjacent to Ben Halls Gap Nature Reserve, which action would protect the biodiversity asset of the park and critically endangered Ben Halls Gap Sphagnum Moss Cool Temperate Rainforest;
- consideration and assessment of the Talbots Creek crossing on the Transverse Track (connecting the halves of the windfarm), a second-order stream supporting potential Booroolong Frog habitat.



Dr Stephen Debus

7 February 2024