



North Coast Environment Council Inc.

Honorary Secretary
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North Coast Environment Council, Inc submission:

Application number

SSD-41020244

EPBC ID Number

2023/09641

Assessment Type

State Significant Development

Development Type

Electricity Generation - Solar

Local Government Areas

Richmond Valley

The North Coast Environment Council represents many groups and individuals across an area stretching from the Hunter River to the Queensland Border and west to the New England Highway. This area includes the most biologically diverse region of NSW. Our members have campaigned for more than forty years to support the protection of the biodiversity across our region.

The NCEC is aware of the urgency to move to 100% renewable energy to help mitigate the impending climate disaster, however we believe that this should not be at the expense of high Conservation Vegetation and Threatened fauna species. While the proposed site is adjacent to high voltage transmission lines, reducing the need for extensive clearing to link to the grid, we believe that the proposed development in its present form will result in unacceptable impacts on important biodiversity values.

Given that there are extensive, largely cleared areas of relative low biodiversity value in the nearby area, also adjacent to the transmission network, we believe that one of the many sites better suited to this endeavour should have been chosen.

While the proposed site has been extensively cleared, it does support remnant patches of Endangered Ecological Communities including Subtropical Coastal Floodplain Forest of the New South Wales North Coast Bioregion, Swamp Sclerophyll Forest on Coastal Floodplains of the New South Wales North Coast as well as the EPBC Act listed Endangered Subtropical eucalypt floodplain forest and woodland of the New South Wales North Coast and South East Queensland bioregions.

It is proposed to remove 21.27 ha of remnant native vegetation (including 4.33ha of a nationally listed EEC), 1.32 ha of planted native vegetation, 28 scattered paddock trees, and 21 hollow-bearing trees (out of the 42 recorded) which is unacceptable. Additional areas of habitat will be negatively impacted by fences as well as light and noise, further adding to the loss of important habitat.

There are twelve listed threatened species which have been recorded on the site and it is within an important fauna corridor linking Ellangowan and Braemar State Forests in the west to Bungawalbin State Forest, National Park and State Conservation area to the east. These areas are important koala habitat and barriers established by this project will impact the movement of threatened fauna including koalas.

Due to its impact on EPBC listed species and ecosystems we believe the project should be referred to the Commonwealth for further assessment due to its impact on EPBC listed species and ecosystems.

We are also concerned about potential hydrological impacts the project may have on adjoining wetlands and EEC's due to changes in the movement of both surface and ground water. We believe that a thorough, professional hydrological study should be undertaken to identify potential negative impacts and appropriate mitigation measures be applied.

The project could certainly be greatly improved through reducing the development footprint, retaining and enhancing the federally listed EEC and significantly expanding well designed fauna corridors up to at least 350 metres in width to be effective, as well as restoring wide riparian corridors within the site.

Unless significant modifications to the current proposal are made, we believe that it should be rejected.

Regards,

A handwritten signature in cursive script, appearing to read 'Jimmy Malecki'.

Jimmy Malecki

Secretary North Coast Environment Council