



Your ref: SSD-38358962

Our ref: DOC26-30565

Emma-Rose Cooper  
Senior Planning Officer  
Department of Planning, Housing and Infrastructure - NSW Planning Group  
Via Major Projects Portal: PAE-104217722

Dear Emma-Rose

**Subject: Keri Keri Wind Farm (SSD-38358962) RTS**

Thank you for your email dated 20 January 2026 seeking advice from the Conservation Programs, Heritage and Regulation (CPHR) Group and the National Parks and Wildlife Services (NPWS) of the NSW Department of Climate Change, Energy, the Environment and Water (DCCEEW) on the Response to Submissions (RTS).

We have reviewed the RTS against the Secretary's Environmental Assessment Requirements (SEARs) provided by the Department of Planning, Housing and Infrastructure to the proponent on 14 April 2022 and CPHR and NPWS advice on the Environmental Impact Statement (EIS) provided on 15 July 2024 (DOC12/399724).

The issues relating to flood risk management have been resolved, subject to the proponent completing the additional requirements as committed to in Table 4.1 of the *Keri Keri Wind Farm - Submissions Report* (ERM, 2026) and as detailed in **Attachment A**.

There are residual issues related to biodiversity matters, as identified in the CPHR comments provided in **Attachment A**. The key issues are:

- Survey coverage for several threatened flora species is incomplete and adequacy needs to be demonstrated, or additional surveys or assumed presence will be required.
- PCT mapping requires review to ensure all impacts to native vegetation have been assessed.
- The credit liability needs to be updated once the outstanding issues are resolved.

There are residual issues identified by NPWS, as documented in **Attachment B**.

We request that all plans required as a Condition of Approval that relate to biodiversity or flooding should be developed in consultation with, and to the satisfaction of, CPHR.

If you have any questions about this advice, please contact Simon Maffei, Senior Project Officer, via [planning.southwest@environment.nsw.gov.au](mailto:planning.southwest@environment.nsw.gov.au).

Yours sincerely

Tyrie Starrs  
19 February 2026

**Senior Manager, South  
Conservation Planning and Assessment  
Conservation Programs, Heritage and Regulation Group**

ATTACHMENT A – CPHR comments on Keri Keri Wind Farm (SSD-38358962) - Response to Submissions  
ATTACHMENT B – NPWS comments on Keri Keri Wind Farm (SSD-38358962) - Response to Submissions

## ATTACHMENT A CPHR comments on Keri Keri Wind Farm (SSD-38358962) – Response to Submissions

In preparing this advice CPA has reviewed the following documents:

- *Keri Keri Wind Farm – Amended BDAR* (ERM, 2026)
- *Keri Keri Wind Farm – Submissions Report* (ERM, 2026)
- *Keri Keri Wind Farm – Amendment Report* (ERM, 2026)
- *Appendix H (Keri Keri Wind Farm Flood Assessment – Addendum)* (BMT, 2025)

Detailed feedback about the Applicant's response to the CPHR EIS submission is provided in the table below. Item numbers correspond to those in the BCS and NPWS EIS response dated 15 July 2024 and Table 1-2 of the amended BDAR.

**Issues that are not listed below are considered by CPHR to be resolved.**

### Flooding

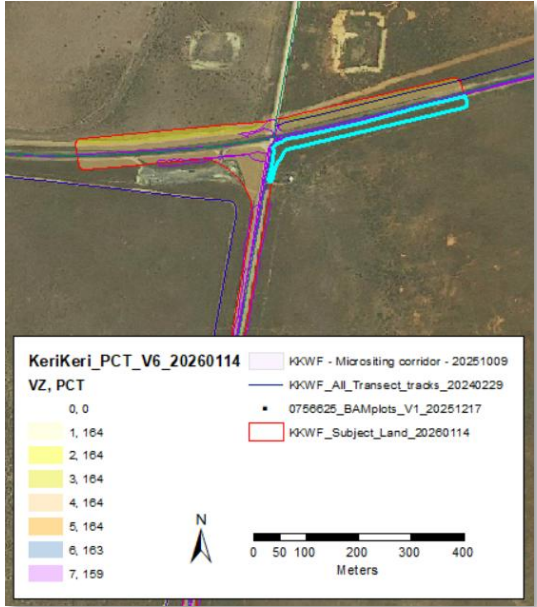
|                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|----------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| CPHR Issue 1.1 | Actively engage with the local Council and the NSW SES to demonstrate that emergency management matters have been discussed and supported. This should inform the development of a site-specific flood emergency response plan.                                                                                                                                                                                                                                                                                                                                                                                      |
|                | <p>The proponent has not demonstrated that Murray River Council (Council) and/or the NSW State Emergency Service (SES) have been actively engaged in relation to flood emergency management matters.</p> <p>Table 4.4 of <i>Appendix H (Keri Keri Wind Farm Flood Assessment – Addendum)</i> states that the “SES did not provide a submission during EIS exhibition” and that “Council’s submission did not identify any matters related to flooding”.</p> <p>The absence of relevant submissions from Council and NSW SES does not constitute evidence of proactive or meaningful engagement by the proponent.</p> |
| Recommend      | Prior to commencing development, the proponent must actively engage with Council and NSW SES on flood related emergency management matters. Engagement must inform a site-specific flood emergency response plan that includes actions which Council and NSW SES support. The NSW SES can be contacted via <a href="mailto:rra@ses.nsw.gov.au">rra@ses.nsw.gov.au</a> .                                                                                                                                                                                                                                              |

|                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|----------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| CPHR Issue 3.1 | Ensure future hydraulic models include the detailed designs associated with proposed project infrastructure to adequately demonstrate the impact of the project on flood behaviour.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|                | <p>The representation of the proposed development in the <i>Appendix H (Keri Keri Wind Farm Flood Assessment – Addendum)</i> hydraulic model is largely achieved through elevation and roughness adjustments in the model terrain. Subsequently <i>Appendix H (Keri Keri Wind Farm Flood Assessment – Addendum)</i> provides a low-resolution and inaccurate assessment of flood risk and impact.</p> <p>Further hydraulic modelling should incorporate the detailed design of the project infrastructure to accurately define the impacts of flood events on the site, as well as the impacts of the proposed development, including ancillary works, on flood behaviour.</p> |

|           |                                                                                                                                                                                                                                                                                                                                                                                                               |
|-----------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Recommend | <p>As committed to in Table 4.1 of the <i>Keri Keri Wind Farm - Submissions Report</i>, the hydraulic model:</p> <ul style="list-style-type: none"> <li>• must be updated to include the detailed design to adequately demonstrate the impact of the proposed project on flood behaviour.</li> <li>• should be used to inform the detailed design, ensuring that impacts are minimised or avoided.</li> </ul> |
|-----------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

## Biodiversity

|                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|-------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| CPHR<br>Issues 5.1<br>and 6.1 | <p>Provide further detail of threatened flora survey effort to demonstrate survey adequacy and revise species polygons for 'area' species to include all suitable habitat.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|                               | <p>There are five threatened flora species identified as candidate species in Table 5.3 of the BDAR. Lanky Buttons (<i>Leptorhynchos orientalis</i>) was also observed within the project area and should be further assessed as a candidate species in the BDAR.</p> <p>A review of flora survey effort identified 216 ha of suitable habitat patches &gt;1 ha that are not covered by a 20 m buffer to all survey tracks. The unsurveyed areas are shown in red in <b>Figure 1</b> below. All threatened flora species have areas of unsurveyed suitable habitat.</p> <p><b>Figure 1. Suitable habitat areas &gt;1 ha unsurveyed for threatened flora species</b></p>  |
| Recommend                     | <p>For threatened flora species with survey coverage gaps in areas of associated PCTs, undertake further surveys, obtain an expert report, or contact the Renewable Energy Biodiversity Support team (<a href="mailto:rebs@dcceew.nsw.gov.au">rebs@dcceew.nsw.gov.au</a>) to discuss assessing unsurveyed areas for assumed presence.</p>                                                                                                                                                                                                                                                                                                                                                                                                                    |

|               |                                                                                                                                                                                                                                                                                                                                                  |
|---------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| CPHR Issue 12 | Review PCT mapping                                                                                                                                                                                                                                                                                                                               |
|               | <p>An area of vegetation evident on aerial imagery (0.64 ha, see below <b>Figure 2</b>) has been attributed to PCT 0 near the corner of Keri Keri Road and Sturt Highway.</p> <p><b>Figure 2. Area of potential native vegetation assessed as PCT 0.</b></p>  |
| Recommend     | Assess this area as native vegetation or provide BAM Plot or rapid data point to justify the allocation of this area to PCT 0.                                                                                                                                                                                                                   |

|                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|-----------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| CPHR Issue 17.4 | Revise the BBAMP in consultation with CPHR and NPWS.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| Recommend       | <p>Revise the draft BBAMP in consultation with CPHR and NPWS so that trigger levels, mitigation measures, monitoring requirements and issues identified below are addressed:</p> <ol style="list-style-type: none"> <li>1. Population sizes used to calculate triggers have potentially resulted in some non-precautionary trigger levels which require review and further justification. For example, Pink Cockatoo and Sharp-tailed Sandpiper mortality trigger levels are potentially too high and some species which require inclusion have been omitted, including Glossy Ibis, Painted Snipe and Latham's Snipe.</li> <li>2. Include non-threatened protected species that are likely to be at high collision risk, such as Little Raven, Galah, Australian Magpie and White-striped Free-tail Bat.</li> <li>3. Revise the Trigger Action Response Plan to incorporate SMART principles that include mitigation.</li> <li>4. Update the carcass search radius to 170 m for all species and remove the transect search requirements so that the entire search radius is searched.</li> <li>5. Include a requirement for an adequate amount of at height bat data to provide adequate confidence to further inform the BBAMP (at least 12 months), prior to construction.</li> </ol> |

|                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|-----------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| CPHR Issue 21.1 | Revise Table 8-6 (formerly Table 8-7) to detail the mitigation and management measures implemented through post-approval plans.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| Recommend       | <ul style="list-style-type: none"> <li>• Add pest management as a mitigation measure. This was previously committed to in the EIS BDAR.</li> <li>• Define the criteria and map the areas that will be avoided and managed as 'Environmental Sensitive No-go zones' or 'areas of significance'.</li> <li>• Specify monitoring for retained threatened flora species adjoining construction areas.</li> <li>• Identify that wetland areas and key habitats for the Southern Bell Frog must be protected through appropriate erosion and sediment controls.</li> <li>• Identify where speed limits will be imposed and specify speed limits to reduce vehicle strike impacts on threatened fauna.</li> </ul> |

|               |                                                                                                                                                                                                                                          |
|---------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| CPHR Issue 22 | Revision of MNES assessment.                                                                                                                                                                                                             |
| Recommend     | Update the MNES assessment in response to addressing the issues raised in this review. In particular, address changes to the MNES assessment associated with Issues 5.1 and 6.1 that may impact on the credit liability of EPBC species. |

|               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|---------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| CPHR Issue 24 | Update the BAM-C predicted, candidate and habitat survey tabs to be consistent with the BDAR.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| Recommend     | <p>Address inconsistencies between the BDAR and BAM-C by up-dating the BAM-C, including:</p> <ul style="list-style-type: none"> <li>• Plains-wanderer is listed as manually added in the BDAR (Table 5-1) but is missing from the BAM-C Habitat suitability: Predicted tab.</li> <li>• Species noted as retained for assessment in Table 5-5, White-bellied Sea Eagle, Little Eagle and Pink Cockatoo, have been removed from the Habitat suitability: Candidate tab before habitat survey results were applied.</li> <li>• Other manually added candidate species, including Southern Bell Frog, Southern Myotis and <i>Pterostylis pedina</i>, are also missing from the BAM-C, and their survey outcomes have not been entered.</li> <li>• Pink Cockatoo and Little Eagle were recorded but removed from the Candidate tab rather than having their survey results documented in the Habitat Survey tab.</li> </ul> <p>Once updated, recalculate the credit liability and revise the BDAR accordingly.</p> |

## ATTACHMENT B NPWS comments on Keri Keri Wind Farm (SSD-38358962) – Response to Submissions

On review of the *Keri Keri Wind Farm Submissions Report (V1-R4)* prepared by *Environmental Resources Management Australia Pty Ltd*, dated 16 January 2026 (RTS), NPWS raises the outstanding matters in the tables below. These comments are based on the matters previously raised in our letter dated 15 July 2024 (BCD/NPWS ref DOC12/399724).

**Issues not listed below are considered by NPWS to be resolved.**

|                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|----------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| NPWS Issue 1.6 | Consider how unauthorised egress or use of parks will be managed due to the general proximity and accessibility of the lands reserved under the <i>National Parks and Wildlife Act 1974</i> . Recognise that, as part of all future project operational plans, use and access to Yanga State Conservation Area (Yanga SCA) is limited to activities authorised under the adopted <i>Yanga National Park, Yanga State Conservation Area and Yanga Nature Reserve Plan of Management</i> (DPIE, 2020). |
|                | NPWS raised issues initially around potential unauthorised and undocumented access to, or use of, Yanga SCA due to the proximity and nature of the project's haulage requirements. Acciona Energy has, as part of the RTS, committed to no direct impacts on Yanga SCA. Residual risk is still a relevant consideration.                                                                                                                                                                             |
| Recommend      | No access to, and use of, Yanga State Conservation Area as land reserved under the <i>NSW National Parks and Wildlife Act 1974</i> . Access may only be permitted where activities are authorised by, or under, the <i>NSW National Parks and Wildlife Act 1974</i> .                                                                                                                                                                                                                                |

|                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|----------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| NPWS Issue 2.1 | Acciona Energy and the DPHI Planning consider consolidation of, and colocation of transmission and grid connection infrastructure, so undue pressure is not placed on the adjacent land reserved under the <i>National Parks and Wildlife Act 1974</i> .                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|                | NPWS requested that Acciona Energy consider allowing for the consolidation or colocation of grid connection infrastructure by negotiating with surrounding renewable projects. As the Keri Keri Wind Farm retains a prime location to access the TransGrid EnergyConnect Project.<br><br>NPWS recognises that legal requirements at the time did not support negotiation between providers with respect to consolidation or colocation of transmission line grid connections. This placed pressure on NPWS, and land reserved under the <i>National Parks and Wildlife Act 1974</i> , as the only unsecured access point to the TransGrid EnergyConnect Transmission Line. No resolution was provided by the RTS or DPHI Planning. |
| Recommend      | NPWS requests that DPHI Planning consider standard conditioning around negotiation requirements for the consolidation or colocation of ancillary transmission and grid connection infrastructure. This should require proponents, or energy providers operating under the approval, to negotiate joint use of connections in the renewable energy zones.                                                                                                                                                                                                                                                                                                                                                                           |

|                |                                                                                                                                                                                                |
|----------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| NPWS Issue 4.4 | Blasting is adequately assessed as part of the EIS. This shall include impacts to the values (natural and cultural) of the Yanga SCA and on the maintenance of safe access via Keri Keri Road. |
|----------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

|           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|-----------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|           | NPWS acknowledges that the RTS defers the environmental assessment of blasting operations to future preparation of a Blasting Plan (as and if required). The agency recognises that, due to the amended project layout, the risk at the immediate boundary of the development site has been reduced, with the nearest wind turbine now 1.2km from Yanga SCA, although ancillary facilities remain proximate. This has reduced the likelihood of direct impacts attributed to blasting, but has not completely removed risks to Yanga SCA's values or safe access to the park via Keri Keri Road. |
| Recommend | NPWS is consulted during the preparation of any future Blasting Plan. The plan should consider impacts to the values (natural, cultural and social) of Yanga SCA, and ensure the retention of safe and sustained access via Keri Keri Road.                                                                                                                                                                                                                                                                                                                                                      |

|                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|----------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| NPWS Issue 4.5 | Provide an acoustic (noise) monitoring program to ensure levels are adhered to, and the effects on Yanga SCA can be adequately reported.                                                                                                                                                                                                                                                                                                                                      |
|                | Acciona Energy agreed as part of the RTS to prepare a Noise Monitoring Plan for the construction phase of the project. NPWS advises that noise levels above 40dB(A) have the potential to impact critically endangered birds and other at-risk species on Yanga SCA. The noise levels during construction should be monitored on the Yanga SCA interface to ensure levels as committed to in the RTS are adhered to, and the effects on Yanga SCA are adequately reported on. |
| Recommend      | NPWS is consulted during the preparation of the Noise Monitoring Plan. The plan is to set out the acoustic monitoring on the boundary interface of Yanga SCA, ensuring that exceedance of the 40dB(A) criterion does not occur. Where exceedances are identified, they are reported on and mitigated in line with the Biodiversity Management Plan.                                                                                                                           |

|                     |                                                                                                                                                                                                                                                                                                    |
|---------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| NPWS Issue 5.5./5.6 | Prepare a Construction Traffic Management Plan (CTMP), confirm in consultation with council the preferred speed limits for Keri Keri Road, and ensure signage is established, which will ensure all road users comply.                                                                             |
|                     | NPWS expressed concern about the project's use of oversized and overmass (OSOM) vehicles, the extent of ancillary construction access and the increased vehicular traffic predicted along Keri Keri Road. Acciona Energy agreed to the preparation of a CTMP, which included NPWS recommendations. |
| Recommend           | NPWS is consulted during the preparation of the Construction Traffic Management Plan. The plan is to establish speed limits on Keri Keri Road, a Drivers' Code of Conduct to manage road user safety, and ensure safe access to Yanga SCA via Keri Keri Road is maintained.                        |

|                    |                                                                                                                              |
|--------------------|------------------------------------------------------------------------------------------------------------------------------|
| NPWS Issue 6.3/6.4 | Consultation with NPWS during preparation of the Bird and Bat Adaptive Management Plan and the Biodiversity Management Plan. |
|--------------------|------------------------------------------------------------------------------------------------------------------------------|

|           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|-----------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|           | <p>NPWS requested consideration of Yanga SCA, especially in assessing the indirect, prescribed and cumulative impacts on biodiversity, including those associated with the loss of landscape connectivity, migratory species, protection of threatened birds and bats and as a release site for the Plains-wanderer <i>Pedionomus torquatus</i>.</p> <p>Species, both threatened and conservation significant, are known from Yanga SCA. Those proximate to the project and Keri Keri Road were flagged by NPWS, such as the Greenhood Orchid (<i>Pterostylis pedina</i>), Plains-wanderer (<i>Pedionomus torquatus</i>), Australian Bustard (<i>Ardeotis australis</i>) and Little Eagle (<i>Hieraetus morphnoides</i>). NPWS requested a heightened recognition of Yanga SCA in the context of its migratory and wetland-dependent avian species, as 64 species, with 43 of them breeding (including colonial nesting species) across the Yanga Precinct of parks covering Waugarah Lake, Tarwillie, The Avenue, Piggery, Yanga Creek wetlands and Nimmie–Caira lignum swamps. This includes large populations of pelicans, raising the significance of NPWS's involvement in the preparation and operational delivery of the Bird and Bat Adaptive Management Plan and the project's Biodiversity Management Plan.</p> |
| Recommend | NPWS is consulted with before finalising the Bird and Bat Adaptive Management Plan and the Biodiversity Management Plan. The plan should recognise NPWS's role as the adjoining land manager and park authority for Yanga SCA and the greater Yanga Precinct. NPWS has both a vested interest and a statutory responsibility in the protection of migratory and threatened bird and bat populations with respect to its estate and addressing direct threats associated with the project's construction and operation.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |

|                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|----------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| NPWS Issue 8.1 | Uncertified aerodromes (as helipads) in the parks are considered. Yanga's rotary helipad sites include (a) Bronzewing Drive 34° 26.752' S/143° 48.469' E, and (b) Yanga Homestead 34° 42.91' S/143° 36.576' E. NPWS highlights that temporary aircraft landing facilities, or emergency landing, can occur anywhere on Yanga SCA.                                                                                                                                                                                                                               |
|                | The uncertified aerodromes (as helipads) in the Yanga Precinct of parks were not considered, nor was the agency's use of both fixed and rotary aircraft in low flight and low visibility operations. NPWS is both a public land manager and a firefighting authority that uses aircraft in a multitude of operational functions. NPWS's policy is that the agency may also respond to fires within 8 km of the boundary of land reserved or acquired under the NPW Act, at the discretion of the Area Manager, if a fire threat to the NPWS estate is detected. |
| Recommend      | NPWS is consulted during all bushfire or emergency plan preparation to ensure recognition of the uncertified aerodromes (as helipads) in the Yanga Precinct and the use of temporary or emergency aircraft landing areas on Yanga SCA.                                                                                                                                                                                                                                                                                                                          |

|                |                                                                                                                                                                                                                                                                                                              |
|----------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| NPWS Issue 8.5 | Safety risk assessments are revised based on the additional information affecting Yanga SCA/ NPWS operations and provide a conclusion on the WTGs and WMTs, address need for obstacle lighting in the maintenance of acceptable levels of safety for NPWS aerial operations (low flight and low visibility). |
|                | Acciona Energy agreed and remains committed to maintaining the safety and performance of NPWS aerial operations.                                                                                                                                                                                             |

|           |                                                                                                                                                                                                                                                                                                                                 |
|-----------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Recommend | NPWS is consulted during the preparation of any future Lighting Plan for the project. The plan is to ensure adequate aviation hazard/obstacle lighting on wind turbine generators and meteorological masts consistent with the Civil Aviation Safety Authority (CASA), and these are to be appropriately designed and operated. |
|-----------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

|                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|----------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| NPWS Issue 9.1 | Preparation of the Bushfire and Emergency Management and Operations Plan                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|                | Acciona Energy agreed and remains committed to the plan as part of the RTS.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| Recommend      | NPWS is consulted during the preparation of the Bushfire Emergency Management and Operations Plan. The plan should consider the <i>Murrumbidgee Valley National Park Yanga Precinct Fire Management Strategy</i> (OEH, 2014), identify and mitigate ignition risks associated with the project's construction and operation and cover fire preparedness. NPWS is to be recognised as a notifiable agency where fire threatens the estate, contact via the Lower Darling Area on 03 5021 8941 or <a href="mailto:npws.lowerdarling@environment.nsw.gov.au">npws.lowerdarling@environment.nsw.gov.au</a> . For emergency incidents via the NPWS Park Operations West Branch Duty Officer via Ph: 02 8275 1740. |

|                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|-------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| NPWS Issue 11.1 to 11.3 | The management of dust, water and erosion issues arising from the upgrade and use of Keri Keri Road, installation of water diversion banks, and the de-watering during project construction, or discharge of collected or directed run-off.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|                         | Acciona Energy is committed to providing a Soil and Water Management Plan (SWMP), managing issues raised with dust, water diversion and erosion arising from the project.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| Recommend               | NPWS is consulted during the preparation of the Soil and Water Management Plan (SWMP). The plan should ensure: <ul style="list-style-type: none"> <li>dust deposition gauge is used to monitor dust affecting Yanga SCA as per the <i>Approved Methods and Guidelines for the Modelling and Assessment of Air Pollutants in New South Wales (NSW EPA, 2022)</i>, with links to the proposed Air Quality and Dust Management Plan.</li> <li>hydrological assessment is conducted with modelling data for the site and the floodplain before diversion banks are utilised to modify surface water flow to/from waterways, or wetlands which feed into important riverine habitats.</li> <li>dewatering and site discharge are adequately managed, so sensitive receivers, including the Yanga SCA, are not adversely affected.</li> </ul> |

|                 |                                                                                                                                                                                                                                                                                                                                                                                            |
|-----------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| NPWS Issue 11.4 | An erosion and sediment control plan (ESCP) is prepared for Keri Keri Road, with suitable measures applied to effectively mitigate impacts to Yanga SCA. Measures are to limit the discharge of sediment-laden runoff onto Yanga SCA, propose sediment controls (e.g., sumps and/or sediment basins) to protect water quality, and ensure any discharge is at a low, non-erosive velocity. |
|-----------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

|           |                                                                                                                                                                                                                                                                                                                       |
|-----------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|           | <p>Acciona Energy is committed to preparing and providing an ESCP for Keri Keri Road, with suitable measures to effectively mitigate impacts. NPWS raise concerns about Yanga SCA and the application of measures to limit the discharge of sediment-laden runoff and protect water quality.</p>                      |
| Recommend | <p>NPWS is consulted during the preparation of the Erosion and Sediment Control Plan (ESCP) for Keri Keri Road. The plan is to have suitable measures to effectively mitigate impacts and limit the discharge of sediment-laden runoff onto Yanga SCA and ensure any discharge is at a low, non-erosive velocity.</p> |