



Julia Green
Energy and Resource Assessments
Department of Planning, Housing and Infrastructure

By email: julia.a.green@dpie.nsw.gov.au

Dear Ms Green

Dinawan Wind Farm

Thank you for the referral of the proposed Dinawan Wind Farm State Significant Development (SSD 50725708) Environmental Impact Statement (EIS) via the NSW Planning Major Projects Portal.

The NSW National Parks and Wildlife Service (NPWS) appreciates the opportunity to consider the wind farms proximity and likely impacts to our estate as land reserved and acquired under the *National Parks and Wildlife Act 1974* (NPW Act). We note that in accordance with the Secretary's Environmental Assessment Requirements (SEARs) as issued on 14 December 2022 by Department Planning, Housing and Industry, consideration of conservation areas and consultation with NPWS was required.

NPWS advises that land reserved under the NPW Act in proximity to the Dinawan Wind Farm as proposed by Spark Renewables Pty Ltd consists of Oolambeyan National Park (9km to the north-west), South-West Woodland Nature Reserve complex with the Edgar (plus land acquired), Steam Plains and Puckawidgee Precincts about (10 km to the south-west) with the Kulki Precinct, as the closest at 5.8 km to the north.

On review of the EIS as published on [Dinawan Wind Farm | Planning Portal - Department of Planning \(nsw.gov.au\)](https://www.nsw.gov.au/dinawan-wind-farm-planning-portal) we advise that direct impacts to the NPWS estate is adequately avoided due to the wind farms separation. NPWS raises only two residual concerns around indirect impacts, these are around telecommunications and aerial land management operations. These matters are discussed in the sections below with respect to NPWS statutory land management functions.

1. Telecommunications

On review of the Appendix E10 - *Dinawan Wind Farm Telecommunication Impact Assessment Middleton Group Engineering Pty Ltd, dated 30 May 2024* (TIA).

The TIA has adequately addressed the current fixed telecommunications systems and considered potential affects and offered mitigation measures. Overall the analysis concluded that no significant interference is expected to any link, NPWS agrees based on Australia Standards and compliance with the *Radiocommunications Act 1992*, 2020 ICNIRP Health Guidelines and equipment manufacturers.

The issues raised by NPWS are about the inadequacies of the current fix telecommunications system in this locality, and the agency's reliance on seasonal and emergency deployment of temporary towers (or Cell on Wheels) for periodic and emergency works to augment the radio network. These systems have not been considered as part of the TIA. NPWS accepts that they are not registered on the Australian Communication and Media (ACM) system and are variable in application, but the remain critical to our land management operations. NPWS is reliant on these portable towers to

establish and ensure reliable coverage during high risk program delivery inclusive of aerial shooting, baiting and wildfire response. This is critical to both ground based and aerial responses. This has not been addressed as part of the TIA.

NPWS recommends

Revising the EIS and the TIA to ensure

- 1.1 use of the mobile communication systems, deployment of temporary towers (or Cell on Wheels) for periodic and emergency works to ensure reliable radio coverage during NPWS high risk program delivery is considered, assessed and residual risk articulated with respect to NPWS estate and the NSW Telecommunication Authority as the radio network operator.
- 1.2 future operational plans for the wind farm are to ensure the current VHF simplex channels, future UHF PSN Trunking services and mobile systems remain operational post wind farm construction. NPWS simply requests a set pathway to report and seek resolution to any telecommunications links or performance issues resulting from the wind farm.

2. Aviation

On review of the Appendix E9 – *Aviation Impact Assessment Dinawan Wind Farm (E220305) prepared by Aviation Projects Pty Ltd, dated 29 May 2024 (AIA)*.

The AIA makes no reference to NPWS as a government agency, bush fire firefighting authority or land manager with respect to aviation impacts attached to low-flight aerial operations. Nor has the AIA address the implications aerial operation across this landscape based on the Oolambeyan National Park and the South West Woodland Nature Reserve complex, especially considering the disconnected nature of the nature reserves in this landscape.

NPWS conducts low flight operations, often low visibility operations for both land management and emergency purposes using both rotary and fixed winged aircraft. The AIA also failed to mention the currently operations helipads used by NPWS within 30km of wind farm as raised. NPWS's policy is that the agency may respond to bush fires threats within 8kms of its estate boundary, at the discretion of the NPWS Area Manager. The *NASF Guideline D: Managing the Risk to Aviation Safety of Wind Turbine Installations (Wind Farms)/Wind Monitoring Towers* also requires identification of safety risks posed by wind turbine generators or wind monitoring installations from an aviation perspective.

NPWS recommends

Revising the EIS and AIA to ensure:

- 2.1 un-certified Aircraft Landing Area (ALA) as aerodrome (helipad) located on Oolambeyan National Park (as the Old Cricket Pitch) is considered. NPWS also highlights that temporary aircraft landing facilities, or emergency landing can occur anywhere on NPWS estate during a state of emergency or medical evacuations.
- 2.2 direct and cumulative impacts associated with renewable energy development (wind farms) on NPWS operations, with recognition of likely increased aviation hazards, radar and communication system interference, as it relates to emergency and operational use of NPWS estate are assessed.

If you have any further questions, please contact, Tim O'Kelly NPWS Manager, Riverina Area on 03 54839110 or email via tim.okelly@environment.nsw.gov.au.

Yours sincerely



Darren Pitt
Director, West Branch
NSW National Parks and Wildlife Service

9 August 2024