



NSW National Parks and Wildlife Service

Your ref: SSD-50725708
Our ref: DOC24/762572

Ms Tatsiana Bandaruk
Team Leader, Environmental Assessments
Department of Planning, Housing and Infrastructure

By email: tatsiana.bandaruk@planning.nsw.gov.au

Dear Ms Bandurak

Thank you for your referral of the Environmental Impact Statement (EIS) for the proposed Bullawah Wind Farm State Significant Development (SSD- 50505215) via the NSW Planning Major Projects Portal.

The NSW National Parks and Wildlife Service (NPWS) appreciates the opportunity to consider the wind farm's proximity and likely impacts to lands reserved or acquired under the *National Parks and Wildlife Act 1974* (NPW Act). In accordance with the Secretary's Environmental Assessment Requirements (SEARs), as issued on 12 December 2022, consideration of conservation areas and consultation with NPWS was required in the preparation of the EIS.

NPWS is keenly interested in the proposed Bullawah Wind Farm as it adjoins Oolambeyan National Park (NP). South West Woodland Nature Reserve (SWWNR) is located 16 km south of the site of the proposal.

Our review of the EIS has identified there are several potential direct and indirect impacts to these parks and NPWS management of these lands that may result from the proposal. In summary, key issues are:

- Noise and vibration impacts
- Impacts to landscape amenity resulting from night lighting
- Inadequate consideration of NPWS's use of aviation, including use of nearby helipads
- Lack of recognition of NPWS's role as a firefighting authority relevant to the development site.

These and other matters are discussed in detail in **Attachment A**.

If you have any further questions about these matters, please contact Mr Tim O'Kelly, Manager, Riverina Area, on 03 5483 9110 or at tim.okelly@environment.nsw.gov.au.

Yours sincerely

Darren Pitt
A/Director West Branch
National Parks and Wildlife Service

23 September 2024

Attachment A – NPWS comments on Bullawah Wind Farm SSD- 50505215

On review of the EIS published on [Bullawah Wind Farm | Planning Portal – Department of Planning \(nsw.gov.au\)](https://www.bullawahwindfarm.com.au/planning-portal), NPWS makes the following comments.

1. Noise and vibration

NPWS has reviewed the EIS and Appendix 10 – Noise and Vibration Assessment (20211154) prepared by Marshall Day Acoustics, dated 30 July 2024 (**NVIA**).

The reports do not identify Oolambeyan NP as a sensitive receiver, nor does the assessment consider the maximum noise as recorded on NPWS land.

The NVIA indicates that, based on the groupings of major plant items during key construction tasks, total noise emissions for the proposed construction stages will range from 115 dB(A) to 120 dB(A). However construction noise impacts to Oolambeyan NP have not been considered.

The NVIA includes a noise level contour at Figure 2 which indicates an upper limit of 45 dB(A) within Oolambeyan NP along the southern boundary interface during the wind farm's operation.

Recommendations:

1. As part of the response to submissions, revise the NVIA and mitigation measures to:
 - a. Apply a baseline noise limit criterion of 35 dB(A) to Oolambeyan NP to reflect its treatment as a sensitive receiver.
 - b. Acknowledge noise levels above 40 dB(A) have the potential to impact on wildlife occupying Oolambeyan NP, including critically endangered bird species. If exceedance occurs, impacts on biodiversity values of Oolambeyan NP will need to be assessed in more detail.
 - c. Provide an acoustic (noise) monitoring program to ensure stated noise levels are adhered to and effects on Oolambeyan NP are reported. If noise limits affecting NPWS estate exceed 40 dB(A) additional assessment and biodiversity monitoring is requested as part of the Biodiversity Management Plan.

2. Landscape amenity

NPWS has reviewed the EIS and Appendix 9 – Landscape and Vibration Assessment prepared by Moir Landscape, dated 27 June 2024 (**LVA**).

Two public viewpoints towards the project site have been assessed in Oolambeyan NP, both being in the area defined as the Built Heritage Precinct in the northern section of the park. NPWS recognises that existing intervening vegetation will screen daytime views of the proposal from this Precinct.

However, night lighting associated with the project has the potential to have significant impacts on landscape amenity due to light pollution, light spill and light glow affecting views of the night sky. NPWS understands lighting associated with the development will include lighting for night-time construction activities and security, lighting of wind turbine generators (WTGs) and meteorological masts (referred to as wind monitoring towers (WMTs)) for aviation safety, and lighting for workers accommodation, other buildings and substations/switching stations.

Recommendations:

2. As part of the RTS, revise the LVA and associated mitigation measures to:
 - a. Undertake additional assessment of potential night-time lighting impacts consistent with Australian Standard (AS) 4282:2023.

- b. Consistent with AS4282:2023, use the [National Light Pollution Guidelines for Wildlife](#)¹ (DCCEEW 2023) to ensure adequate design and consideration of the natural (biodiversity) values attributed to Oolambeyan NP and ensure:
 - aviation hazard lighting on WTGs and WMTs is appropriately designed and operated
 - all other internal project lighting is designed so that all light fittings are appropriately shielded so the lighting is directed downwards with no light directed above the horizontal plane.

3. Aviation

NPWS has reviewed the EIS and Appendix 21 - Aviation Impact Assessment (102206-02) prepared by Aviation Projects Pty Ltd, dated 26 July 2024 (**AIA**).

NPWS is both a firefighting and land management agency which uses aircraft in a multitude of operational functions. NPWS's policy is that, consistent with the *Rural Fires Act 1997*, the agency may respond to fires within 8 km of the boundary of land reserved or acquired under the NPW Act, at the discretion of the NPWS Area Manager, if a detected fire threat is likely to affect those lands.

NPWS's recommended input to SEARs therefore requested that the EIS identify and assess the risks and increased restrictions to land management operations undertaken by NPWS, especially the use of both rotary and fixed winged aircraft for aerial pest baiting, weed spraying, firefighting and hazard reduction purposes.

The EIS and AIA does not address this and was prepared without consultation with NPWS.

The AIA is therefore inadequate. It fails to mention operational helipads currently used by NPWS within 30 km of the proposed wind farm. NPWS highlights that a recorded helipad exists just off Wargam Road (known as 'Booororban' which is used for aerial shooting purposes near SWWNR) and another is located in Oolambeyan NP (known as the Old Cricket Pitch). NPWS also highlights that temporary aircraft landing facilities, or emergency landing can occur anywhere on NPWS estate during state of emergency operations or medical evacuations.

The proposed project will contain 143 WTGs, with a maximum blade-tip height of 300m above the ground. The ground elevation for the highest WTG location (WTG33) is 103m ADH, which with a 300 m WTG height, will result in a maximum overall height of 403m AHD. It therefore poses a significant aviation hazard.

Recommendations:

- 3. As part of the RTS, revise the AIA and associated mitigation measures to ensure:
 - a. Consideration of the proposal's proximity to uncertified aerodromes (i.e. recorded helipads), including the Booororban helipad and the Old Cricket Pitch, as well as the boundary of NPWS-managed lands
 - b. Assessment of the proposal's impacts and influence on low flight and low visibility based aerial operations for both rotary and fixed wing aircraft.
 - c. Meteorological masts constructed prior to the turbines are appropriately lit and marked to ensure they are visible to aircraft in accordance with NASF Guideline D, with the location and height of all masts reported to NPWS prior to commencement of installation as an interim measure.
 - d. Safety risk assessments are revised based on the additional information affecting NPWS and emergency aerial operations (low flight and low visibility), with a conclusion on the maintenance of acceptable levels of safety in this locality and a review of the need for obstacle lighting.

¹ National Light Pollution Guideline for Wildlife - <https://www.dcceew.gov.au/environment/biodiversity/publications/national-light-pollution-guidelines-wildlife>

4. Telecommunications

NPWS recognises that the telecommunications and electro-magnetic interference assessment is based on electrical components installed to an Australia Standard in compliance with the *Radiocommunications Act 1992*, 2020 ICNIRP Health Guidelines and equipment manufacturer's guarantee. NPWS advises that, no foreseeable low-power RF link paths or transient mobile transmission impacts, are likely to result from the project detected at this time.

Recommendations:

4. In preparing the future operational plan for the project:
 - a. ensure NPWS's current VHF simplex channels and future UHF PSN Trunking services are considered post construction
 - b. a pathway for reporting and resolution is created to rectify any issues relating to telecommunications RF links or mobile radio performance related to NPWS management operations or emergency response in this locality.

5. Biodiversity

NPWS has reviewed the EIS and Appendix 6 – Biodiversity Development Assessment Report (22110/R16) prepared by Umwelt (Australia) Pty Limited, dated July 2024 (**BDAR**).

Recommendations:

5. Prepare the Bird and Bat Management Plan and Biodiversity Management Plan in consultation with NPWS, to ensure it:
 - a. Considers pest animal and weed management strategically, using management strategies delivered in collaboration with NPWS as an adjoining land manager.
 - b. Assesses the vehicle collision risk and impacts on wildlife in this locality with increased heavy vehicle movements, including night use of the roads for construction purposes.
 - c. Ensures biosecurity and [hygiene protocols](#)² are applied.

6. Bushfire

The EIS and Appendix 17 – Bush Fire Hazard Assessment prepared by Peak Land Management, dated 26 July 2024 (**BHA**) do not recognise NPWS's role as a firefighting authority in responding to wildfires in the neighbouring park, and one of the firefighting authorities that may be involved in responding to fires on the development site.

NPWS notes that the BFA just considers bushfire risk, however, it does not consider potential impacts to firefighting operations. This lack of consideration of the potential impacts to NPWS's firefighting operations remains a significant omission in the EIS.

Recommendations:

6. As part of the RTS, revise the BHA and associated mitigation measures to
 - a. Assess the impacts of the proposal on firefighting operations in consultation with NPWS, and consider the current version of the [Oolambeyan National Park Fire Management Strategy](#)³ (OEH 2014).
7. As a condition of any project approval, require the Emergency Management and Operations Plan to be prepared in consultation with NPWS and the RFS, and finalised to the satisfaction of both firefighting authorities.

² SOS – Hygiene Guidelines - <https://www.environment.nsw.gov.au/-/media/OEH/Corporate-Site/Documents/Animals-and-plants/Wildlife-management/saving-our-species-hygiene-guidelines-200164.pdf>

³ Oolambeyan National Park Fire Management Strategy - <https://www.environment.nsw.gov.au/research-and-publications/publications-search/oolambeyan-national-park-fire-management-strategy>