



Your ref: SSD-53293710
Our ref: DOC24/984066

Mr David Way
Senior Planning Officer
Department of Planning, Housing and Infrastructure

By email: david.way@planning.nsw.gov.au

Dear Mr Way

RE: Mallee Cliffs Wind Farm | Environmental Impact Statement Referral

Thank you for the referral of the Environmental Impact Statement (EIS) for the proposed Mallee Wind Farm State Significant Development (SSD-53293710) via the 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 17 February 2024, consideration of conservation areas and consultation with NPWS was required in the preparation of the EIS.

NPWS is interested in the proposed Mallee Wind Farm as the project adjoins Mallee Cliffs National Park, which is land reserved under Part 4 of the NPW Act. NPWS appreciates that the Project has been designed to maximise setbacks from the National Park by including a minimum buffer of 800m between the boundary and nearest proposed Wind Turbine Generator (WTG).

Our review of the EIS has identified several potential direct and indirect impacts to Mallee Cliffs National Park, and the management of this land. In summary the key issues are identified below:

- Bushfire management
- Aviation and meteorological masts
- Noise and vibration impact on wildlife
- Telecommunications
- Ecological management plans

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

If you have any further questions about this issue, please contact the Lower Darling Area via 03 5021 8900 or at npws.lowerdarling@environment.nsw.gov.au.

Yours sincerely

Jo Gorman
Manager, Lower Darling Area
NSW National Parks and Wildlife Service

9 December 2024

Attachment A – NPWS comments on Mallee Wind Farm SSD-53293710

1. Bushfire

NPWS has reviewed the EIS Appendix 17 – Bushfire Hazard Assessment (Version 5) prepared by Peak Land Management, dated 24 September 2024.

NPWS has a role as a firefighting authority in responding to wildfires in the neighbouring Mallee Cliffs National Park, and one of the firefighting authorities that may be involved in responding to fires on the development site.

As detailed within the [Mallee Cliffs National Park | Plan of Management](#)¹, the Centre Fire Trail is accessed via a private property access road to the west of the estate. The EIS acknowledges that the proposal will impose restricted access to Mallee Cliffs National Park for NPWS, the Australian Wildlife Conservancy (AWC) and RFS.

NPWS recognise that Spark Renewables is committed to develop an access protocol in consultation with key stakeholders to ensure that adequate access is provided to assist with bush fire management during the construction and operational phases of the project.

Recommendations:

1. As a condition of any project approval, require the Bush Fire Emergency Management and Operations Plan (BFEMOP) to be prepared in consultation with NPWS and to the satisfaction of both NPWS and the RFS as firefighting authorities.
 - a. The BFEMOP is to include an access protocol to inform NPWS, AWC and the RFS of any temporary disruptions or change to access arrangements to Mallee Cliffs National Park through the life of the project.
2. All Asset Protection Zones (APZ), temporary construction fencing and permanent security fencing to be contained wholly within the development site to ensure that access trails within Mallee Cliffs National Parks are maintained.

2. Aviation

NPWS has reviewed the EIS and Appendix 20 – Aviation Impact Assessment (102209-01) prepared by Aviation Projects Pty Ltd, dated 25 September 2024.

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 highlights that there is a recorded airstrip located within Mallee Cliffs National Park approximately 23km west of the project area. 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 project includes seven permanent meteorological masts, with two located on the interface to the park, with the highest being 170m (893ft AMSL). This has the potential to pose a significant aviation hazard during aerial management operations.

NPWS facilitates regular operational use of Remotely Piloted Aircraft Systems (RPAS) / drones for surveys and monitoring, which will be an increasing used method in the area.

Recommendations:

3. Consistent with the recommendations of the Aviation Impact Assessment, NPWS request that meteorological masts are appropriately lit and marked to ensure they are visible to aircraft in accordance with NASF Guideline D.
4. The proposal is not to restrict the use of RPAS / drones for NPWS / AWC.

¹ Mallee Cliffs National Park Plan of Management - <https://www.environment.nsw.gov.au/research-and-publications/publications-search/mallee-cliffs-national-park-plan-of-management>

3. Noise and vibration

NPWS has reviewed the EIS and Appendix 10 - Noise and Vibration Assessment (Rp 002 20220306) prepared by Marshall Day Acoustics, dated 24 September 2024 (NVIA).

The assessment does not identify Mallee Cliffs National Park as a sensitive receiver and therefore, the reports do not consider potential construction noise and vibration impacts for the adjoining park.

The NVIA indicates that the maximum operational noise of the project on the Mallee Cliffs National Park boundary is 40dB (Figure 5, NVIA). NPWS is concerned that noise levels above 40dB(A) have the potential to impact on wildlife occupying Mallee Cliffs National Park.

Recommendations:

5. As part of the RTS:
 - a. Acknowledge noise levels above 40 dB(A) have the potential to impact on wildlife occupying Mallee Cliffs National Park. If exceedance occurs, impacts on biodiversity values of Mallee Cliffs National Park will need to be assessed in more detail.
 - b. Provide an acoustic (noise) monitoring program to ensure stated noise levels are adhered to and effects on Mallee Cliffs National Park 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.

4. Telecommunications

NPWS has reviewed the EIS and Appendix 18 – Telecommunications Impact Assessment (Revision 0) prepared by Middleton Group, dated 25 September 2024.

NPWS recognise that there are likely to be no direct telecommunication impacts (including NPWS RF links), however, current VHF and future UHF PSN Trunking services may be indirectly impacted by turbines in proximity to the Mallee Cliffs National Park.

Recommendations:

6. NPWS request that Spark Renewables engage with NPWS post-construction if any issues arise with RF links, mobile radio performance, or NPWS communication systems (including VHF simplex channels and future UHF PSN Trunking services).

5. Ecological management plans

NPWS has reviewed the EIS and Appendix 6 – Biodiversity Development Assessment Report (22494/R10) prepared by Umwelt (Australia) Pty Limited, dated November 2024 (BDAR).

Recommendations:

Post approval preparation of 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](https://www.environment.nsw.gov.au/-/media/OEH/Corporate-Site/Documents/Animals-and-plants/Wildlife-management/saving-our-species-hygiene-guidelines-200164.pdf)² are applied.

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>