

Development Dept: LGS



9 July 2025

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Department of Planning, Housing and Infrastructure
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Dear Michael,

**Secretary's Environmental Assessment Requirements (SEARs)
Proposed State Significant Development (SSD-86097208)
Mount Lambie Wind Farm**

I refer to your email notification received on 19 June 2025 in relation to the Secretary's Environmental Assessment Requirements (SEARs) for the proposed Mount Lambie Wind Farm and thank the Department for the opportunity to comment on the SEARs.

The Scoping Report describes the Project as follows:

Tetris Energy proposes to build the Mount Lambie Wind Farm, which would include the construction and operation of up to 20 wind turbine generators (WTGs) spread over an area of around 2,540 hectares about 12 kilometres (km) south-west of Wallerawang in the Central Tablelands of New South Wales (NSW) (the Project). The Project would be located within the Lithgow City Local Government Area (LGA) and is situated on 37 lots. The Project will be developed on land that is predominantly cleared and used for sheep and cattle grazing.

The Project is a renewable energy development with a capacity of up to 200 megawatts (MW), enough to power about 115,000 households per year. The Project is currently in the early stages of development, including stakeholder engagement and concept design.

The Scoping Report appropriately identifies the potential impacts and matters that warrant careful consideration in relation the Project. Council submits the following comments and requests in relation to the SEARs:

1. Lot 2 in DP1022552

Table 6-7 on page 51 lists Lot 2 in DP1022552 as owned by a Local Government Authority (ie, Lithgow City Council). However, our records indicate that Lot 2 is in private ownership.

2. Amenity and Visual Impacts

Clause 6.3.3 of the Scoping Report states that a preliminary cumulative visual impact analysis has been completed to identify dwellings and significant viewpoints within 8,000m from the Project and other surrounding wind farms.

There are significant properties and visually prominent places located outside the 8,000m mark and when combined with the removal of the surrounding forestry and prominent ridgelines the Project may impact on these places. For example, public places, adjoining landowners/residences, surrounding villages, heritage items, look out points, and the Portland, Rydal, Sodwalls and Tarana communities and the Great Western Highway/Castlereagh Highway.

Council requests that the assessment considers a wider study area to include populated communities, campgrounds and tourist attractions, to be shown on projector diagrams that represent the proposed development against the backdrop of these localities (i.e. long ranging).

3. Land use Compatibility and Recreational Use

Clause 6.12 of the Scoping Report acknowledges that land within the Project area is zoned RU1 (Primary Production) and RU2 (Rural Landscape) under the Lithgow LEP and is currently used for agricultural purposes by multiple landholders.

Council requests that the EIS provide details about the compatibility of the Project with the surrounding land uses for farming/residential purposes, in addition to potential impacts on the local prime agricultural land.

The locality boasts National Parks such as Sunny Corner National Park, Marrangaroo National Park, Lidsdale State Forest, Evans Crown Nature Reserve, Eusdale Nature Reserve, Mount Lambie National Park etc. The parks, roads and surrounding areas are enjoyed by recreational users and tourists for motorbike riding, 4-wheel driving, bushwalking, bird watching, camping etc.

Council requests more investigations be undertaken in relation to the potential impacts the Project may have on recreational users.

4. Hazard and Risks

Clause 2.2.3 of the Scoping Report identifies the key environmental risks and hazards and Chapter 6 identifies the methodologies for assessing such risks and hazards. Clause 6.10 also identifies hazards and safety in relation to construction and operation.

Council requests that the EIS includes detail about how such risks and hazards will be mitigated and managed throughout the life of the Project.

5. Contamination

Clause 6.8.3 of the Scoping Report states that a detailed soils and contamination assessment would be required during the EIS stage.

Council requests that the EIS includes details regarding the potential for indirect contamination on watercourses and mitigation and management strategies for addressing such impacts.

Clause 3.5 states that decommissioning activities may result in noise, dust and traffic impacts. In addition to considering contamination impacts during construction and operation of the Project, Council requests that the EIS considers a final validation report after decommissioning.

6. Biodiversity

Clause 6.2.3 of the Scoping Report states that the SEARS for the Project are likely to require a Biodiversity Development Assessment Report (BDAR) to be prepared in accordance with the BAM.

Clause 6.2.1.5 lists 20 threatened species that have a moderate or higher likelihood of occurrence within the Project area, including several bird and bat species, and the koala.

The last paragraph of clause 6.2.3 states that due to the potential presence of threatened species within the Project area, an EPBC referral is being developed for the Project, which will be informed by Significant Impact Assessments to determine the likely impacts to Matters of National Environmental Significance.

Council strongly supports the requirement for a BDAR, EPBC referral and Significant Impact Assessment to inform the SEARS.

7. Purple Copper Butterfly

Pages 38 and 39 of the Assessment of Significance (Appendix I of Appendix C – Preliminary Biodiversity Impact Assessment) discuss the Bathurst Copper Butterfly, also known as the Purple Copper Butterfly. It is noted that the species was not recorded within the Survey area during preliminary field surveys, however is considered to have a moderate likelihood of occurrence within the Project area given the presence of species records within the 10 km search area and the abundance of *Bursaria spinosa* within the shrub-layer of the Project area.

Council strongly supports the recommendation that targeted surveys are undertaken within areas of suitable and high-quality habitat to determine if the species is present, and appropriate management and protection measures for the purple copper butterfly form part of the EIS.

8. Aboriginal Cultural Heritage

Clause 6.5.3 of the Scoping Report states that an Aboriginal Cultural Heritage Assessment Report (ACHAR) will be prepared in accordance with the 'Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales (DECCW, 2010a)', the 'Guide to investigating, assessing and reporting on Aboriginal cultural heritage in NSW (OEH 2011)' and the 'Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010 (DECCW, 2010b)', which will be submitted with the EIS.

The Scoping Report confirms that preparation of the ACHAR will include consultation with Registered Aboriginal Parties, along with Elders and Knowledge Holders of the region.

Council strongly supports engagement with the Wiradjuri Elders and a contact list can be provided if needed.

The Proposal indicates that the AHIMS database identifies Aboriginal heritage sites within the Project area and within 1 km of the Project area. Additionally, that there is a high likelihood that archaeological material or sites reflecting intensive use by Aboriginal people would be located in the Project area.

Council requests that management and mitigation measures for the protection of Aboriginal archaeological material and sites are considered in the EIS.

9. Archaeological mining equipment – Heritage Act 1977

It is noted that a Historic Heritage Assessment is to be undertaken for the Project.

Council requests that the EIS consider the potential for archaeological mining equipment to be discovered during construction or operation (given the mining history of the area) and requests that management and mitigation measures for the protection of that equipment is considered in the EIS.

10. Traffic

Council notes that a traffic and transport assessment and a traffic and transport impact assessment will be carried out during the preparation of the EIS (clause 6.7.2.1 and clause 6.7.3, Appendix A of Scoping Report).

Council requests that:

- (a) any impacts on Council's road network, including Curly Dick Road, Sodwalls Road, Stacks Road and Lawsons Lane, be assessed within the report;
- (b) a dilapidation study be submitted to Council for assessment.

11. Heritage

The Project area is located in proximity to significant world, state and local heritage items including: Gardens of Stone and significant National Parks, Rydal rail underbridges, Sodwalls Cemetery, Railway Cottage, the Old Sodwalls Public School, Sodwalls Inn (former Sodwalls House) and Cemetery, Meadow Flat Public School, Meadow Flat War Memorial, St Luke's Anglican Church, Mount Lambie Presbyterian Cemetery. Accordingly, there is potential for the Project to have indirectly impacts on heritage items during the construction process and direct impacts during operations through visual impacts.

Council requests that management and monitoring strategies be considered to mitigate impacts on heritage items during construction of the Project and beyond, such as through visual screening.

12. Land

Council notes that the EIS will assess the potential interactions of the Project with other nearby land uses as well as with the current land use of the Project area. Other assessments carried out for the EIS, including impacts to visual amenity, noise, biodiversity and hazards, will inform the land use assessment (clause 6.12 of Scoping Report).

13. Noise and Vibration

Council notes the Preliminary Environmental Noise Assessment included as Appendix D of the Scoping Report and is satisfied that a detailed noise and vibration impact assessment will be prepared as part of the EIS in accordance with relevant Guidelines (clause 6.3.3 of Scoping Report).

Council is pleased that the detailed noise and vibration impact assessment will consider construction noise impacts including assessment of road traffic noise during construction and operational activities, and assess any vibration impacts at sensitive receivers (Appendix A of Scoping Report).

14. Social and Economic Impacts

Council notes the Preliminary Social Impact Assessment included as Appendix E of the Scoping Report and is satisfied that a detailed assessment of social impacts will be required as part of the EIS (clause 6.4 and Appendix E of Scoping Report).

15. Water Resources

Council is pleased that a qualitative water and hydrology assessment will be prepared as part of the EIS to investigate potential impacts to erosion and sediment, water availability, and potential pollution of watercourses and groundwater during construction. A detailed Soil and Water Management Plan will also be proposed prior to construction commencement (clause 6.9.3 of Scoping Report).

16. Air Quality

Council notes that the EIS will assess the potential air quality impacts resulting from the construction and operation of the Project. This would include construction air quality controls in line with relevant guidelines (clause 6.12 of Scoping Report).

17. Waste

Council is satisfied that the EIS will assess the likely waste streams that would be generated by the construction, operation and decommissioning of the Project, including classifying and quantifying anticipated waste.

It is also noted that appropriate management measures for waste generated by the Project would also be determined, including the reuse, recycling and disposal of waste as appropriate and in line with relevant guidelines (clause 6.12 of Scoping Report).

18. Decommissioning Plan

Item N20 of Table 8-1 of the Scoping Report documents community concerns due to environmental impacts arising from decommissioning (Table 8-1 of the Scoping Report).

Council strongly supports the provision of an environmental management plan for the EIS, and requests that the environmental management plan include a section dedicated to decommissioning.

19. Landscaping and Rehabilitation Plan

It is noted that a Preliminary Landscape Character and Visual Impact Assessment has been included as Appendix B of the Scoping Report, and an assessment of landscape character at the EIS stage will be undertaken in line with the Technical Supplement for LVIA (DPHI, 2024d), which may include a broader Landscape Character Study area of 25km.

Council further notes in the Scoping Report that the land used for the Project would be revegetated and returned to its previous condition as far as practicable (clause 3.5 of the Scoping Report).

Council requests that more detail is provided in the EIS in relation to rehabilitation of the Project area following decommissioning.

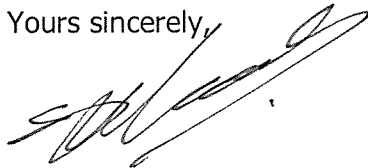
20. Community benefits

Council will require a Planning Agreement with the proponent for the provision of public benefits.

It is requested that additional consultation is undertaken with Council by the applicant prior to the exhibition of the EIS and during the assessment process.

Please do not hesitate to contact Lauren Stevens between Monday to Friday on (02) 6354 9999, in Council's Development Department should you have any queries in relation to this matter.

Yours sincerely,



Shaun Elwood
Director People & Places