

## **RE: Liverpool Range Wind Farm Modification 1 -Application No SSD-6696-Mod-1**

We fully support the use of renewable energy as a replacement for fossil fuels however this does not grant a license to destroy or degrade biodiversity, native habitat and cultural assets. The planned Liverpool Range Wind Farm Mod-1 External Transmission Line involves unacceptable clearing of remnant native vegetation, State Conservation Areas and the National Trust listed high value conservation landscape – impacting on the culturally significant ‘Hands on Rock’ and “The Drip gorge” picnic area, Goulburn River. The latter is regarded as “Sacred Country *“Ngayirr Ngurambang”<sup>1</sup>*”. The importance of avoiding further loss of biodiversity and cultural values in this sensitive highly regarded area is widely acknowledged.

Tilt Renewables Liverpool Range Wind Farm Modification (LRWF Mod-1) proposal should not be approved unless the existing External Transmission Line Site easement as shown in Appendix E – Maps 16-18 is withdrawn and replaced with an alternate Transmission Line connection requirement that links the development project to the CWO REZ Transmission Line at the Uarbry Hub.

The impact on biodiversity estimated for the Approved Project was incorrect in the original proposal and the LRWF Mod-1 presents a recalculation. This shows a significant increase equating to an additional 1,249.1 ha of native vegetation removal (Table 40) with direct impacts to threatened species habitat (Table 42). On this basis the Applicant provided incorrect information on the loss of biodiversity due to the Transmission Line easements and a reassessment of the full biodiversity, cultural and recreational impacts for the external easement is necessary if the original route is to remain an option.

The impact to The Drip gorge recreational and culturally significant areas currently under Native title claim has not been acknowledged in this development application or indicated on maps supplied (Figure 16 MOD-1 Report). The Applicant proposal to shift 1 km of the transmission line to the eastern side of Ulan road (south of Hands on Rock) onto Crown land parcels Lot 7300/DP1136299 and Lot 7008/DP1030463 locates it beside Lot 80/DP75073) on which Mudgee Local Aboriginal Land Council (LALC) has a Native Land Title claim and undertake cultural activities. This places the transmission line in sight of a stone yarning circle as well as the entrance of The Drip gorge reserve/picnic area, an extremely popular recreational area where there is documented visitation ~ 50,000 people/year (NPWS Mudgee 2020). See attached map that shows these features.

This easement corridor is widely opposed by local community and visitors to this special area. Mudgee District Environment Group (MDEG) found over 90% of visitors surveyed on site were opposed to the clearing for the powerline easement (Report into Social License Concerning Renewable Energy Transmission Lines and Towers Along the Tilt Renewables Ulan Road Easement, Ulan).

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<sup>1</sup> <https://artsoutwest.org.au/ngayirr-ngurambangsacred-country/>

The maps showing the route of the powerline provided by Tilt in Mod-1 are inadequate; they do not clearly show for example the location of waterways, topographical contours, cadastral boundaries, in some places the Ulan Road or the extent and type of remnant and riparian vegetation removal required along the Goulburn River and the Ulan Road. (Figure 16 & 17, Appendix E - Maps 16-17).

In conclusion a stronger commitment by Tilt Renewables and unequivocal withdrawal of the indicated southern external Transmission Line corridor is essential before Mod-1 can be approved.

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**Figure 16: Proposed changes to transmission line alignment near Hands on Rock**

