

## **Stratford Renewable Energy Hub - Submission**

This submission in support of the proposed SREH is made in my capacity as a neighbouring landholder – property ID 60.

I consider that the SREH would have significant benefits in terms of renewable energy generation and local employment, mostly during construction but extending through the operational phase.

However I have concerns about the measures proposed to mitigate environmental impacts at the location of the upper reservoir. While most of the development footprint would be confined to areas of land that has been subject to previous clearing, grazing and mining, some parts of the footprint – particularly where the upper reservoir would be located - extend to areas of high conservation value.

Proposed measures to mitigate and offset impacts on those areas, including impacts on threatened and endangered flora and fauna are constructive and substantial, but are less than what should be required as a condition of approval of the project.

I acknowledge the rationale behind selection of the reservoir site, and believe the issues of concern could be addressed without substantially affecting the viability of the project.

The plans for mitigation and management of impacts should include identification and securing of areas that may serve as new breeding and feeding habitat (or connecting corridors to new habitat) for displaced fauna – particularly the threatened, vulnerable or endangered species including the Koala, Parma Wallaby, Spotted-tailed Quoll, Grey-headed Flying Fox, Sooty Owl and Glossy Black Cockatoo.

The Biodiversity Assessment Report (BAR) confirms that the native vegetation that would be removed, particularly at the upper reservoir site, provides habitat resources for native fauna species, including threatened species and confirms that its removal would result in direct impacts on habitat for the threatened fauna species that are assumed to utilise available resources there.

The removal of native vegetation would also reduce connectivity between habitats. The BAR concludes that given the extent of native vegetation around and between areas of development, the impacts on habitat connectivity are unlikely to have significant residual impacts on any native species' life cycles. However at the location of upper reservoir, most of the immediately connected areas are not subject to any long-term conservation protections. Much is used for beef cattle grazing and the proposed zoning as RU2 under the draft Midcoast Local Environment Plan allows for extensive agriculture and forestry.

The BAR notes that Yancoal's preferred approach to offset impacts of the project is to secure and retire appropriate credits from several Lots owned by Yancoal, located immediately adjacent to the study area, with a payment to the Biodiversity Conservation Fund (BCF) to be considered to meet the residual credit requirements if a suitable number

and type of biodiversity credits cannot not be secured from third parties or fulfilled through a Biodiversity Stewardship Agreement.

Payment to the BCF would be a greatly inferior approach. It would comprise a form of “compensation” for species and habitats adversely impacted by the development, but would not mitigate the direct impacts of the vegetation clearance, particularly the loss of habitat currently used by fauna inhabiting or feeding in the project area.

Where parts of lots used for credits have been cleared, those areas should be revegetated to avoid net loss of native vegetation.

The BAR assumes that the proposed Biodiversity Stewardship site(s) is likely to contain similar plant community and habitat types to those that would be impacted by the project. It is concerning that no assessment of potential sites has been provided in the EIS.

However, most if not all Plant Community Types (PCT) that will be reduced in area due to clearance for the upper reservoir occur in adjoining or nearby properties owned by Yancoal.

Should the project be approved, a condition of approval should be that selection of areas for inclusion in the proposed Biodiversity Stewardship Site Agreement must have regard for the PCTs and species represented as well as the total offset credits generated.

Additionally, no clearance of native vegetation should commence until the Biodiversity Stewardship Site (s) has been identified and a Site Management Plan setting out the restoration and management actions required to be undertaken at the BSS to improve biodiversity values has been implemented.

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28 October 2024