



4 November 2024

Armidale Branch

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Tatsiana Bandaruk
Major Projects
NSW Department of Planning and Environment
Via: majorprojects.planningportal.nsw.gov.au

Dear Tatsiana Bandarook and colleagues,

WINTERBOURNE WIND FARM SSD-10471: EXHIBITED AMENDMENT REPORT

The Armidale Branch of the National Parks Association of NSW (NPA) appreciates the opportunity to comment on the current amendments by the proponent to the EIS. We made a submission on 23 January 2023 concerning the original proposal. It explained that we are a local non-government community group that has been dedicated for 50 years to protecting and appreciating nature.

We are pleased to note that several types of environmental impact, have been substantially reduced, although only one less turbine is proposed. This demonstrates that benefits can be achieved from the proponent putting more resources into detailed environmental assessment, considering how to respond to community and landholder concerns and to all the environmental data by improving project design. The delay in achieving this was considerable, but warranted when such a large project is proposed. In particular, we are pleased to note significant reductions in some of the biodiversity impacts, in the lengths of new electricity conductors and internal roads. These improvements will reduce some of the greenhouse gas global impacts of the project, hopefully enabling it to have a positive effect sooner, as well as reducing local impacts.

Our submission was by way of comment on positive benefits of the project as well as on unacceptable impacts. Armidale NPA agreed that submission should neither be listed as an objection nor as supporting the overall project, so neither of these boxes in the major projects portal were ticked.

Most of the points we raised still hold. However, with the expectation that further reductions in biodiversity impacts will be made by the proponent in response to the current round of submissions or to conditions of consent if granted, we have changed our overall position to support construction of a wind farm in this area with many turbines, but not all the details of the current proposal.

Response to submissions

I could not see in this document anything about how they dealt with submissions that were neither listed as “objections” nor as “supporting”: this suggests our submission could have been totally ignored. Perhaps some of our comments were categorised with the objections, which would have been entirely appropriate in relation to parts of our submission, and as being supportive of renewable energy generation from wind, as would also be appropriate. If so, this should have been stated. As the submissions report for a different project’s EIS, also led by ERM, had the same fault, I wonder whether this was a failure by ERM or due to some Department of Planning proforma requirement. I request that in future the Department of Planning ensure that all reports responding to submissions state clearly how submissions from the community that are neither objections nor in support have been considered and responded to.



Minimising impacts on both threatened and declining birds and mammals

It is pleasing to see that amendments include moving turbine B116 so it is further from the national park, as we objected to this tower. 600m is a much better buffer than 150m but not necessarily enough. The section of national park closest to this tower is in far better ecological condition than other nearby areas, because the local bushfire brigade¹ and neighbours were able to do a backburn there in suitable conditions ahead of the 2019 wildfire, but not in nearby areas until a hot night when a firestorm approached. The other areas were so badly burnt that few birds and animals could either survive the fire or recolonize quickly: most trees were killed but a dense thicket of seedling trees and shrubs grew up in the following wet season, grossly changing the habitat. It is not surprising that the “heat map” of bird records near B116A shows this is one of the areas where large numbers of birds were recorded. If they include any of the threatened or common species considered at risk from being struck by blades, this turbine should be removed now.

We remain concerned that the turbines could cause significant loss of birds or bats due to blade strike. No tower should be constructed in locations where species at risk from this are relatively common.

Details of how collision risks were assessed are provided but we are not convinced that everything possible in this project planning stage to minimise impacts has been done. Too much is left to be done later through a BBAM Plan. Once building of the windfarm commences, the BBAMP will be very important. Implementing it during construction and during operation is one of many tasks that warrant permanent ecological staff in addition to contractors

Our original submission includes a paragraph about Squirrel Gliders. We note that infrared cameras mounted on drones and operated by an ecologist and a pilot can now find Greater Gliders more efficiently than ground-based surveys, and this should be used to recheck all turbine sites and transport routes in suitable habitat for either species. Further amendments to the proposal may be needed to better protect these species.

Expecting gliders to always be able to glide across a 40m gap is unrealistic, notably for Squirrel Gliders. It is important to maintain or to least replace tree trunks that are close enough for these smaller gliders to reach easily. Constructing poles to glide to or bridges is a good mitigating action. Plant trees as well.

Reducing impacts on woody native vegetation

The reductions in the amount of woody vegetation proposed to be cleared are great to see.

However, we note that there are still some turbines proposed in or next to significant patches of woodland e.g. B007A, B176A B028 B071A. It may include stringybark woodlands/forests that are not listed as TECs but are still valuable habitats. The desire to locate all towers where they generate the most energy should be tempered by the need to care for all the species that live in these remnant woodlands. They are different ecological communities to those in the national park and, while affected by the 2019 drought, they clearly weren't as grossly altered as severely burnt areas in the park. Further relocation or deletion of some towers is warranted.

“Moderate” condition native grassy vegetation

Relegation of all non-woody native vegetation in locations where woodland has been cleared to “moderate” or “low” condition gives the impression that derived grasslands cannot be in good condition and of high value. Grassy woodland ecosystems naturally had a very high proportion of their plant species and of the insects and animal components of those ecosystems in the grassy layer. The biggest threat to grassy woodland ecosystems is loss of the high biodiversity of this layer: trees can be replanted but we don't know how to grow some of the subshrubs and herbs, let alone how to re-establish the animals that depend on them. Some of the best remaining examples of grassy woodlands were cleared but not continuously grazed – does this apply to any sites in the project area? Some of the “moderate” condition non-woody vegetation could be as valuable as the woody areas. While the presence of trees is often indicative of the value of a remnant of native vegetation, the data collected on what actually

¹ Peter Blomfield pers.com.

remains, particularly in the grass layer, should be used to check that all high value native vegetation is retained, not destroyed. There appears to be more emphasis on using this data to generate statistics.

Workers tend to assume that disturbance to places that lack trees is OK. Some infrequent disturbance is OK but repeated driving on them or doing so in wet weather or with earth-moving equipment or introduction of weeds can wreck them, particularly if sub-shrubs are still present. All moderate to high value grasslands should be identified and protected.

Disproportionate impact on biodiversity in roadside reserves

It is disappointing to read on p21 of the Amended Biodiversity Assessment Report that “Impacts to native vegetation cover within the local road reserve network (i.e., crown lands) was largely unavoidable. Impacts have been minimised where possible by utilising the roadside environment immediately adjacent to the sealed/unsealed road surface. For this reason, impacts on TECs are greatest in the road reserve.” Some sections of these reserves have higher biodiversity values than most freehold land, either because they have not been completely cleared and still have big old trees with hollows that support much wildlife, or because they have not been ploughed or consistently grazed. If you want to see the wildflowers that were once common in our New England region, look closely in roadsides at this time of year.

Where the blades or other oversized parts cannot be transported along a road due to its trees, consider all possible means to save the older trees especially those with hollows. E.g. widen the other side of the road or prune it, don't bulldoze it. In case vehicles may be tempted to drive off the normal road, map all moderate and high-value grassy layers and mark them as environmentally significant exclusion areas.

Concluding comments

We wish to draw to your attention the attached document from the New England Biodiversity Reference Group concerning minimizing the biodiversity impacts of transmission lines. It is relevant to both the transmission lines in this project and to the turbines, substations and other infrastructure. In addition to emphasizing the need to first avoid biodiversity impacts, then mitigate, it includes recommendations for an approach to “offsetting” where this is required. We encourage the Winterbourne Wind proponent to apply a similar approach here. No net loss should apply in the local area and the project should take all possible means to enable improved biodiversity outcomes for all uncommon or declining species in the Walcha area, not just for threatened species. While the Biodiversity Conservation Trust may be able to assist in this, paying BCT to find and secure offset sites somewhere else is not an acceptable approach.

We note that the number of permanent jobs in the operation phase has been reduced from 39 to 16. It seems that the project was thought economic with 39. We suggest that some additional positions be created to implement ongoing environmental impact mitigation and avoidance measures, to manage whatever offset areas are established in the Walcha area, and to work with landholders, researchers and the local community to learn from and keep improving the environmental aspects of operation.

While the Armidale Branch of the National Parks Association now broadly supports Winterbourne Wind project, we request that the proposal be further improved by the proponent or those setting conditions on any approval.

I can be contacted at boydkate@bigpond.net.au

Yours sincerely

Kate Boyd

Armidale Branch Committee Member
National Parks Association of NSW

protecting nature through community action