



Australian Wildlife Services

ABN 29 008 552 243

51 Stonehaven Cres Deakin ACT 2600

ph: (+61) 2 62812160

fax: (+61) 2 62851195

web: www.awt.com.au

E-mail aws@awt.com.au

Boorowa District Landscape Guardians Inc.
PO BOX 82
BOOROWA
NSW 2586

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To the Boorowa District Landscape Guardians Inc

Review of the Rye Park Wind Farm Trust Power's 'Response to Submissions' (biodiversity)

In June 2016, the Boorowa District Landscape Guardians Inc engaged Australian Wildlife Services to undertake a brief review of the 'Rye Park Wind Farm Response to Submissions' (Trust Power 2016) and the Appendix C Biodiversity Addendum (ngh 2016) as it related to likely impacts to biodiversity. Our conclusion is that, while several turbines have been deleted from the project, the proposal still lacks key avoidance and mitigation measures for highly threatened ecosystems, habitat and threatened species. The documentation also lacks evidence-based scientific rigour and referencing when making claims about particular impacts and mitigation measures.

Submissions were made to the Eupron Rye Park Wind Farm Environmental Assessment (EA) (Eupron 2014) by various organisations, government bodies and members of the public. Significant biodiversity issues were raised by several parties including the NSW Office of Environment and Heritage (OEH), stakeholders and members of the public. In a review of the biodiversity components of the original EA, completed in July 2014, Australian Wildlife Services (2014a) found deficiencies in impact assessment for some species, inconsistencies in total area of disturbance, and lack of avoidance and mitigation measures for critically endangered vegetation communities and other threatened flora and fauna. Our concerns remain and we regard the current documents as they relate to biodiversity as an inadequate assessment impact assessment. In our opinion they would not be accepted in a scientific peer review process. The following are our further comments and recommendations in June 2016.

Section 6 'Ecology' of the Main Report 'The Rye Park Wind Farm Response to Submissions' concludes *"the Biodiversity Assessment Addendum identified no change to the conclusions of the assessments of significance completed in the original Biodiversity Assessment. Significant impacts to threatened species and endangered ecological communities are considered unlikely."* Unfortunately, the Main Report lacks either evidence or links that would show a reader how the conclusion was reached. A summary describing the results including real data to support the conclusion is needed. We note

that the report refers to the 'Addendum' generally and in parts to the original EA and biodiversity assessment (BA) (Eupron 2014). Furthermore, the Main Report states that parts of the original documentation and impact assessment are now obsolete and that the new documentation is to be read in conjunction with the original EA. We have difficulty knowing which parts are now current and which are not.

We have reviewed Appendix C Biodiversity Addendum (ngh 2016). Again we had difficulty assessing the impact of the proposal on biodiversity due to a lack of evidence, real data, and references.

The Rye Park Wind Farm proposal was declared a Controlled Action on the 24th April 2014 due to the potential risks to Matters of National and Environmental Significance (MNES). It is still unclear how the proponent has considered the Commonwealth's concerns and requirements.

A more detailed review of important sections of the Main Report and Biodiversity Addendum are below.

Lack of avoidance measures

In the original EA (Eupron 2014), AWS noted that the proponent committed to a 70m buffer to be applied around highly important and high constraint habitat and 100 m around Superb Parrot trees. Despite this commitment, locations of over 20 turbines did not satisfy this avoidance measure. It is excellent to see some turbines have been moved or deleted to avoid potential impacts, however many turbines still remain in or adjacent to high constraint areas and in areas with high numbers of threatened species or hollow bearing trees (e.g. 17, 20, 23, 25, 96, 58, 63, 66, 102, 203, 104 etc). This does not satisfy the avoidance and mitigation criteria set out in the original DGRs and it is clear from the proponent mapping that some areas are better suited to site turbines, transmission lines and other infrastructure away from high biodiversity constraint areas. Furthermore, no evidence based reference to support a 70m buffer was provided in the original EA/BA (Eupron 2014).

Specific turbines still occur within or adjacent to high constraint areas, including (among others):

- 25 – Striped Legless Lizard habitat many other turbines in high quality Striped Legless Lizard habitat – move or delete
- 17, 20, 23 – good condition woodland / forest habitat - delete
- 90, 96 – close to high constraint <70m – site specific analysis not evidence based – move or delete
- 102, 103, 104 – high number of threatened species present – should be high constraint habitat – delete
- 120, 142 – high constraint GSM habitat – move or delete
- 11, 32, 56, 102, 104, 125, 133, 144 - Large numbers of HBT in the vicinity – move or delete (or conduct additional bat, bird and mammal surveys of hollow dependent species).
- 143 – cabling and access roads through Superb Parrot habitat within 100m of a nest tree – high risk of disturbance – move or delete
- Construction compound, substation and concrete batching areas in the Southern end of the project are in high constraint habitat – move or delete

Furthermore, large tracks of good quality (native ground cover intact) box gum woodland (Critically Endangered Ecological Community - CEEC) still have proposed disturbance and clearing for transmission lines and access roads. This is a similar story for high quality Striped Legless Lizard and Golden Sun Moth (GSM) habitat, including where large numbers of GSM were observed. These areas should be avoided.

Turbine 96

Due to proximity of high constrain habitat to RYP_96 – the proponent/ngh undertook site specific analysis to determine impact and risks to fauna. The analysis was not evidence based. Furthermore, they state that no threatened bird or bat species were recorded during the surveys in the vicinity of turbine 96. What is not said is that no specific bird or bat surveys (Anabat) were conducted at the site or in the vicinity (see appendix E5). A moderate density of HBTs is also present in the surrounding more intact vegetation. The turbine should be moved or deleted or additional fauna surveys undertaken to substantiate low risks of impact.

Buffer distances to reduce or manage impacts

In the updated Biodiversity Addendum (ngh 2016), the 70 m buffer is suddenly referred to as an ‘accepted’ formula by Natural England (2012). However, this reference is missing from reference lists in both the Main Report and Appendix C Biodiversity Addendum and cannot be found by internet searches or in other documentation. Therefore, it is difficult to determine the source of this claim. Apparently the OEH agreed to the 70 m buffer distance despite documentation requiring a minimum of 100 m be applied.

We were able to locate a formula published by Natural England (2014), presumably an update of the 2012 version, produced as interim guidelines for setting buffer areas to reduce potential adverse impact to English bats (Natural England 2014). The formula is:

$$b = \sqrt{(50 + bl)^2 - (hh - fh)^2}$$

Where bl = blade length, hh = hub height, fh= feature height (in metres) and 50 (m) is the recommended distance between the moving blade tips and the nearest feature.

See Figure 1.

If this formula applied to the current Rye Park wind farm layout and turbine design specs¹ described by Trust Power (2016), the buffer should be approx **90 m** measured between the base of the turbine footings to the nearest edge of the vegetation canopy / habitat. Thus a 70 m buffer applied to this wind farm to ‘avoid’ impacts is not great enough and probably underestimates potential impacts.

¹ Current design specs are: a maximum tower height of 157 m and a rotor swept area of 130 m diameter (hub height 92 m and blade length 65 m), and a maximum tree height of 20 m (as per Trust Power 2016)

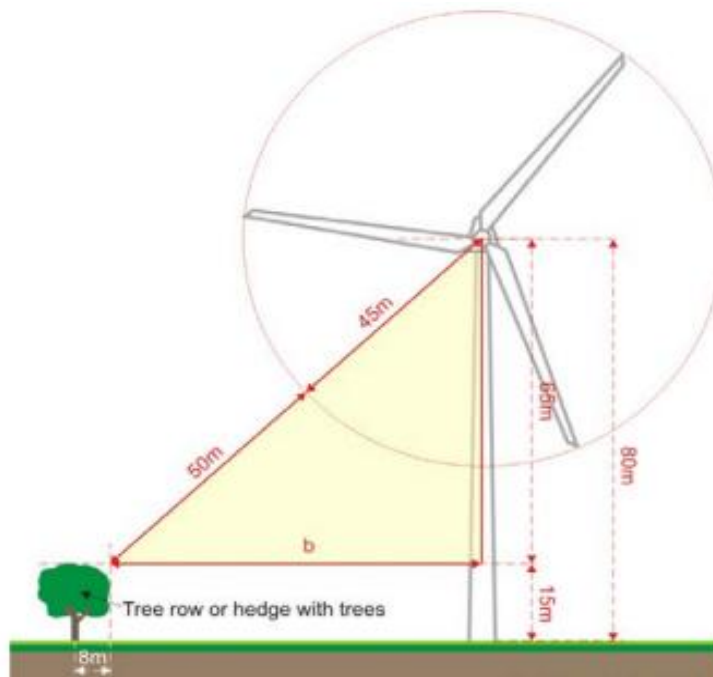


Figure 1 Natural England's (2014) interim guidelines for buffer zones to avoid impacts to bats
Source: Natural England (2014)

Despite the assumed discrepancy in buffer areas applied using the Natural England formula and lack of documentation describing how the buffer zone was calculated; the guidelines are specific to English species of bats. Impacts to Australian bats and Australian birds are not considered by this formula and are unlikely to be appropriately applied across all species. A worst-case scenario in any event should be applied when determining the impact and 70 m is unlikely to be appropriate for all species.

AWS is unaware of similar evidence based or even interim guidelines for Australian conditions. We recommend the OEH/Commonwealth Department of Environment to develop independent Australian specific wind farm infrastructure setback guidelines for threatened and important habitats. Studies should be funded by industry proponents but conducted by independent agencies and subject to peer review.

Superb Parrots

AWS is disappointed that greater attempts were not made through further surveys to delineate Superb Parrot breeding and foraging areas and to detail more specifically Superb Parrot flight paths around all turbines. As stated in our original review of the Biodiversity Assessment, Superb Parrot flight path surveys across years and within seasons and vantage point surveys conducted at all turbines are still needed to increase the level of confidence that all Superb populations / habitat usage on site has been identified and the level of impact has been adequately described as required by the DGRs. The Australian National University is currently undertaking Superb Parrot flight path studies in the ACT using radio / GPS collars to track the movement of the birds. Ngh could better inform their impact statements from such research.

The Addendum states that turbines within the high constraint CEEC and identified Superb Parrot / Painted Honeyeater corridor have been removed from the proposal layout avoiding impacts in the

areas. While turbines RYP_106, RYP_107, RYP_109 have been rightly deleted, more should have been done to quantify the potential impacts to the Superb Parrots at RYP_120 and RYP_145 where Superb Parrots were observed flying > 30-40 m in the vicinity. Vantage point surveys should be conducted at these turbines (and others).

There is also an increased impact upon the Superb Parrot with the current iteration of wind turbine design. The Main Report states that The Superb Parrot was observed to fly within the Rotor Swept Area during targeted surveys and ...*“with the revised turbine RSA there may be a moderate **increase in collision risk** for individuals in the southern end of the project area; however it does not affect factors upon which the original conclusion was drawn”* p49. It is unclear why a moderate increase in collision risk is not considered further.

The proponent had committed to a mitigation measure that specifies a 100 m buffer around Superb Parrot breeding trees to reduce potential disturbance. The proponent has reworded this commitment to apply specifically to turbine infrastructure (p19 Addendum) so they can run cabling and roads through this buffer zone at known Superb nesting sites². There is a very well known risk to Superb Parrot breeding from disturbance (Baker-Gabb, 2011 ;Webster, 1988) and not adhering to the mitigation measures shows disregard to this Vulnerable species.

Little Eagle

As a result of the preferred project, ngh report that impacts to potential breeding habitat for the Little Eagle has been reduced by 4 ha while overall impacts to foraging habitats have increased by 19.7 ha. Ngh report that the increase is not considered to be substantial in the context of the extensive similar habitats that remain in the locality; however, there is no evidence or data to support the claim. How much similar habitat will remain in the locality? Furthermore, Little Eagle foraging grounds were not quantified.

Other threatened birds

The report states that there is no change in the impacts on the Superb Parrot, Regent Honeyeater and Painted Honeyeater for the preferred project; however, it is unclear if the impact remains the same as there have been no changes to the wind farm layout with regard to these species habitat, or if the impacts remain the same because there have been no changes, avoidance or mitigation. If there have been changes to the site layout, then the data should be provided to show evidence that the impacts remain the same for different sites.

Bats

In the original BA p58 clearly states: Three threatened microbat species were recorded within the project area.

- Eastern Bentwing Bat (*Miniopterus oriane (schreibersii) oceansis*).
- Eastern False Pipistrelle (*Falsistrellus tasmaniensis*).
- Yellow-bellied Sheathtail Bat (*Saccolaimus flaviventris*).

² The proponent doesn't seem to have provided conductor clearance dimensions

Evidence supporting the statements “habitats to be removed are not of particular importance” and “a non-significant impact reached” requires evidence to assess why that conclusion was reached. The original EA states these species were detected across the site (7, 9, 25, 80, 82, 104, 143) but locations were/are not mapped with other fauna survey results, and habitat not quantified. Without locational data it is difficult for third parties to demonstrate the assessed likely impact of the current wind farm layout on microbat species.

The Eastern False Pipistrelle was recorded near turbine 80 (old layout) but **is not included** in the fauna results mapping in either the BA or Addendum. Nor are many of the other bat records. Table 5-4 of the original EA states the Eastern False Pipistrelle is present on the site and “roosts in tree hollows and buildings”. Therefore, alienation, edge effects and clearing can potentially impact this species. The species is not considered again, its impact not estimated nor offset (see Table 5-5 of the Addendum).

Barotrauma

There is a risk of bat collisions and/or barotrauma for two of these three species - Yellow-bellied Sheath-tail-bat (*Saccolaimus flaviventris*) and Eastern Bentwing Bat (*Miniopterus schreibersii oceanensis*). Impact has not been correctly assessed or supported with evidence.

Despite previous submissions, the potential impact of barotrauma does not appear to have been assessed as per the DGRs. Barotrauma involves tissue damage to air-containing structures caused by rapid or excessive pressure change; pulmonary barotrauma is lung damage due to expansion of air in the lungs that is not accommodated by exhalation (see Baerwald et al 2008) or by rupture of the middle and/or inner eardrum impairing ability to safely navigate around the towers. Bats do not need to be flying within the RSA to be affected and thus the risk is higher at each turbine for barotrauma to occur. In the 'Guidelines for consideration of bats in wind farm projects – Revision 2014' (Rodrigues et al 2015), a 200 m buffer zone should be applied to bat habitat. Natural England (2014) suggests a 90 m buffer as a guideline to reduce impact to bats. Ngh (2016) claim that the 70 m buffer around areas of high habitat value will ‘reduce’ the potential for ongoing risks to birds and bats (e.g. barotrauma). The document(s) lacks evidence to support this claim. The impact of barotrauma should be accurately assessed or offset as per the DGRs.

Koala

The Addendum states that surveys were conducted for Koala (*Phascolarctos cinereus*) but none were recorded. No further survey effort has been applied since the original EA. Table 2-8 of the Addendum states as the species was not detected there is no impact and thus no requirement to offset. However there are likely to be populations present in the Rye Park Wind Farm project area as they have been recorded in the local area recently (see BL&A 2011a & b; Australian Wildlife Services 2014b).

While this project has been exempted from State Environmental Planning Policy No 44-Koala Habitat Protection, Boorowa Shires and Yass Shires are listed in the Schedules and would have been required to consider if the project site is potential koala habitat or core koala habitat. The Policy defines core koala habitat “as an area of land with a resident population of koalas, evidenced by attributes such

as breeding females (that is, females with young) and recent sightings of and historical records of a population”.

Effective Koala surveys do not simply rely on sighting animals, but require records of tree scratching and faecal pellet identification. Detector dogs are assisting with the latter.

While Koala in the region do appear to have low populations, species persisting in this already highly fragmented landscape are extremely important, especially if they are disease free. The koala should at least be considered properly for impact and offset requirements. More effective surveys should be undertaken.

Impacts on koalas are still required and need to be assessed under EPBC Act as the koala was listed as Vulnerable at the time of referral to the Commonwealth, April 2014.

Yellow-spotted bell frog

Yellow-spotted Bell Frog (*Litoria castanea*) is identified as occurring within close proximity of the project sites, but impacts are considered to be manageable. No proof of this claim is provided and no case studies or examples provided. This is a similar story for the Southern Pygmy Perch (*Nannoperca australis*).

Fragmentation

Fragmentation is still an impact of this development despite claims in the EA that fragmentation is unlikely – removal of 240.8 hectares of native vegetation in an over cleared landscape and individual tree loss can destroy connectivity and cause fragmentation and isolation of habitat patches. The importance of even single or small clump of paddock trees for habitat connectivity is discussed by Fischer & Lindenmayer (2002), Manning et al (2006), Manning & Lindenmayer (2009) and Doerr et al (2011).

Offset plan

AWS considers that offset areas located within the current project boundary will only be ‘additional’ depending on the type of impact being offset. Proposed offset areas in close proximity to turbines and infrastructure include proposed Offset Areas 1, 2, 4, 5, and 7 (see Appendix A Candidate Offset Sites). If the impact being offset is potential fauna habitat loss due to fragmentation, edge effects, alienation or barrier effects (behaviour change in fauna), then offset areas directly adjacent to turbines and wind farm infrastructure are not appropriate. The proximity of turbines and infrastructure is an additional threatening process which cannot be offset during the operational life span of the wind farm (as the threatening process will still exist). Offsets in these areas thus will not lead to a net improvement in biodiversity over-time.

While it is beyond the scope of our assessment and review, we believe the issue of regional impact and additive effects of windfarm developments upon biodiversity is critical. Each proposal is currently assessed alone and we believe it is not considered as an extra slice that is torturing biodiversity to death by a 1000 cuts.

Further Comments

Missing Details and Errors from 'The Response to Submissions'

Details are missing from the 'Ecology' section of the 'Response to Submissions'. As the 'Response to Submissions' is the main document, why does the report not describe the findings explicitly, and so avoid misleading the reader. The following sections lack information or contain errors.

6.3.1 Additional investigations

Additional investigations were listed; however, a summary of the results or findings for the majority of the additional investigations were omitted.

6.3.2 Revised impact assessment

The report states the impacts remain the same but clearing has increased. However, there is no reason provided as to why clearing has increased?

The text is difficult to follow and there is information missing. For example, the tables are not referred to. Are there changes in type and condition of habitat cleared? If so, which types and conditions have changed? Are there changes in box-gum woodland and derived grassland permanent habitat loss with each condition? If so, what are they?

The report states a reduction in the total number of hollow-bearing trees estimated to be impacted by the proposal; however, the report does not include numbers.

6.3.3 Biodiversity offset strategy

The report states that benchmark data on the OEH vegetation database was used in lieu of actual plot data; however, there is no explanation as to why.

Why is the median range considered conservative and how or why are the actual offsets required expected to be below those estimated in the offset strategy?

Offset areas required are not met for ecosystems or species. For example, the Golden Sun Moth offset area required is 1116 ha, yet the potential offset area being proposed for the Golden Sun Moth is only 926.5 ha.

The report states that there is a high level of confidence that suitable offsets are available within the site boundaries. More detail and evidence is required to explain the high level of confidence.

The 'Response to Submissions' states the medium range of the benchmark was used, while the 'Addendum' states the upper benchmark was used and on this basis, not all entities are currently considered able to be met within the candidate offset sites.

6.3.4 Additional mitigation measure

The reports states that additional targeted surveys for the Crimson Spider Orchid will be carried out pre-construction; however, a survey is not a mitigation measure. A survey provides data so that

mitigation measures can be carried out. More detail on the crossing as to what impact is being reduced would be beneficial.

Missing Details and Errors from ‘Biodiversity Assessment Addendum’ There were also details missing from the ‘Biodiversity Addendum’. Again, we believe the report should describe the findings explicitly, so as to not mislead the reader. The following sections lack information or contain errors.

2.1 Key changes to the project

The report should list the number of minor infrastructure layout changes aimed at minimising impacts.

2.2 Justification for changes

The report states that the number of turbines was reduced “to reduce potential habitat for the Stripped Legless Lizard”. This is presumably an error and should read “reduce impact to”, and stripped should be striped.

2.3 Avoidance and mitigation of impacts

2.3.1 Avoidance

The report should state the number of turbines removed and the reference number for these turbines, with respect to the turbines that were removed within the high constraint CEEC and identified Superb Parrot/ Painted Honeyeater corridor. Reference to a figure showing these changes would be helpful.

Similarly, the report should describe which infrastructure has been removed west of turbines 98 and 99. It is also unclear where access tracks and underground reticulation have been redirected.

2.3.2 Impact minimisation

The report states that the transmission line has been relocated so it crosses the narrowest area of community minimising the impacts to the CEEC. There should be more detail including the length of the narrowest area and what the impact will be. Is this area considered in the offset strategy?

The report states the justification for changes includes to increase the buffer distance to the Bango Reserve; however, the increase is not described.

3 Additional studies undertaken

3.4 Hollow-bearing tree survey and assessment

What is a sufficient percent of patch surveyed to extrapolate? What was the percent surveyed to actual area extrapolated?

3.5 Updated desktop assessment and Appendix G

There are some concerns with the assessment of the likelihood of occurrence, which is based on “presence of habitat, proximity of nearest records and mobility of species”. Appendix G provides the nearest record; however, there is no information provided on the mobility of any of the species, nor are there references provided for the nearest record. For example, Appendix G states the Black Falcon’s nearest recorded is 30km from the project site. We conducted a brief literature search on this species, which showed that its “home range is undetermined, but is likely to be larger than that of the comparable Peregrine Falcon (*Falco peregrines*) in the temperate zone (i.e. more than 100 km²) (Marchant & Higgins 1993)” (NSW Scientific Committee for the Threatened Species Conservation Act). Based on the 30km nearest record for the Black Falcon, the report states that the likelihood of occurrence is possible, yet the potential for impact is low. There is no further information provided to assess why the potential for impact is low and it is unclear how this decision was reached. Additionally, the report states that there is no Black Falcon breeding habitat on the project site but does not provide a description of the Black Falcon breeding habitat.

To summarise, data on the mobility of species where their habitat is considered present or marginal, and the nearest record is provided should be recorded and taken into consideration for assessment. A description explaining why the likelihood of occurrence is possible, but the potential for impact is low is required. References for the nearest record should also be provided.

There are some inconsistencies with species listed in section 3.5 and Appendix G. For example, table 3.4 lists the Southern Bell Frog (*Litoria raniformis*), the summary below the table lists the Green And Gold Bell Frog (*Litoria aurea*) and Appendix G lists the Growling Grass Frog (*Litoria raniformis*) and the Yellow Spotted Tree Frog (*Litoria castanea*).

4 Additional information in response to submissions

4.7 Impacts to local and regional Wedge-Tail Eagle ecology

Using NGH's figure of 0.4 WTE/turbine/yr, we calculate 4.36 WTE/turbine/yr. NGH estimate a local population of 4-13 individuals, resulting in 100% to 33% mortality in the first year all turbines are constructed, respectively.

5 Updated and revised impact assessment

5.1 Impact types

The report states that impacts relating to the loss of hollow-bearing trees are discussed in Section 5.2.1; however they are not mentioned in section 5.2.1.

5.2 Estimated impact area of the project

5.2.1 Loss of native vegetation as a key threatening process

The report does not address the following comment from OEH “*OEH considers that the documents do not adequately address the impact of the proposal on the KTP of clearing of native vegetation. Further analysis and correction of figures should be provided.*” A general description of what clearing can lead to is described; however, the **impact** (specific to this proposal) is not addressed. Reporting

that clearing is not significant because the area has been cleared previously is not an adequate response.

5.4 Loss of habitat for threatened fauna

We note that the 'Addendum' states that the impacts from habitat loss specific to threatened species are discussed in detail in the original BA; however, significant information is missing from the sections described for each species in the 'Addendum'.

The contentions for each species in this subsection lack direct evidence (and a SPECIFIC link showing the reader where the evidence can be found). In this instance, the evidence should summarise the results, and include real data to support the claim, or a specific link showing the reader where the supporting data can be found. It is impractical for the reader to search for the evidence to support the claims where no specific links are provided. For many arguments, it is unclear if the data exists.

Superb Parrot, Regent Honeyeater and Painted Honeyeater

For example, the report states that there is no change in the impacts on the Superb Parrot, Regent Honeyeater and Painted Honeyeater for the preferred project; however, it is unclear if the impact remains the same because there have not been any changes in the sites with regard to these species habitat, or if the impacts remain the same because there have been no changes. If there have been changes to the sites, then the data should be provided to show evidence that the impacts remain the same for different sites.

5.6 Collision risks

5.6.1 Revised assessment of bird utilisation data

Superb Parrot

Section 2.3.1 Avoidance, reports that turbines have been removed in the Superb Parrot corridor. Why is this not mentioned in this section of the report?

Swift parrot

Although the swift parrot was not observed at the site, it is listed as a migratory species. The report does not comment on the migratory path and if it crosses the project site.

Note

Review of the extensive Rye Park Wind Farm documentation is ongoing.

Yours sincerely,

George Wilson

Dr George Wilson, Dr Melanie Edwards, Ms Jennifer Smits
Australian Wildlife Services

References

Australian Wildlife Services (2014a). Comments on the Rye Park Wind Farm Environmental Assessment. Review and report made to the Boorowa District Landscape Guardians Inc.

Australian Wildlife Services (2014b). Superb Parrot Flight Path Survey Rugby-Boorowa region NSW, December 2013. Report to Boorowa Landscape Guardians Jan 2014.

BL&A (Brett Lane & Associates Pty Ltd) 2011a. Proposed Rugby wind farm matters of national environmental significance. Report prepared for Suzlon Energy Australia Pty Ltd by Brett Lane & Associates Pty Ltd. Report No. 9193(3.5).

BL&A (Brett Lane & Associates Pty Ltd) 2011b. Proposed Rugby Wind Farm Flora and Fauna Assessment Report No. 9193 (2.3), report to Suzlon Energy Australia Pty Ltd.

Eupron (2014) Rye Park Wind Farm Environmental Assessment (EA). And Appendices.

Natural England (2014) Bats and onshore wind turbines Interim guidance. Natural England Technical Information Note TIN051. Accessed at:

<http://publications.naturalengland.org.uk/search?q=wind+turbine&num=100>

nggh (2016) Appendix C Biodiversity Assessment Addendum Rye Park Windfarm. Report to Eupron March 2016. In Trust Power / Eupron (2016) Rye Park Wind Farm Response to Submissions 12 May 2016 Application No SSD 6693.

NSW Scientific Committee for the Threatened Species Conservation Act. Final Determination. Accessed at: <http://www.environment.nsw.gov.au/resources/threatenedspecies/BlackFalcVSFD.pdf>

Rodrigues L., Bach L., Duborg-Savage M., Karapandza B., Kovac D., Kervyn T., Dekker J., Kepel A., Bach P., Collins J. (2015) Guidelines for consideration of bats in wind farm projects—Revision 2014. EUROBATS Publication Series(3).

Trust Power / Eupron (2016) 'Rye Park Wind Farm Response to Submissions 12 May 2016 Application No SSD 6693.'

Webster R. (1988) 'The Superb Parrot: a survey of the breeding distribution and habitat requirements.' (Australian National Parks and Wildlife Service)