



Office of
Environment
& Heritage

Our Ref: DOC17/82932
Your Ref: MP 10_0160 MOD4

Mr Tim Stuckey
Planning Officer
Department of Planning and Environment
GPO Box 39
Sydney NSW 2001

Dear Mr Stuckey

Re: Modification of the White Rock Wind Farm Project (MP 10_0160) – MOD 4

Thank you for your e-mail dated 23 January 2017 about the proposed modification of the White Rock Wind Farm Project requesting comments from the Office of Environment and Heritage (OEH). I appreciate the opportunity to provide input.

The modification relates to a proposed alternative grid connection comprising approximately 13km of 132kV double circuit transmission line from the White Rock Wind Farm (WRWF) to TransGrid's existing 330kV transmission line near Swan Vale.

The OEH has reviewed the Environmental Assessment Report prepared by Goldwind Australia dated December 2016, and particularly Appendix E which summarises the offset requirements and Appendix F which is the heritage Assessment. Our review has identified a number of issues which are discussed in detail in **Attachment 1** to this letter.

In summary the OEH recommends that:

1. The applicant retires the required 251 credits as described in Table 2 of the Eco Logical Australia letter dated 2 December 2016 (Appendix E) to the satisfaction of OEH prior to the impacts occurring.
2. The recommendations of the Environmental Assessment report relating to Indigenous heritage are implemented.
3. The proposed update of the Cultural Heritage Management Plan be developed in consultation with the Aboriginal stakeholders for the project and the OEH.

If you have any further questions about this issue, Mr Krister Waern, Senior Operations Officer, Regional Operations, OEH, can be contacted on 6640 2503 or at krister.waern@environment.nsw.gov.au.

Yours sincerely

 24 February 2017

DIMITRI YOUNG
Senior Team Leader Planning, North East Region
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Contact officer: KRISTER WAERN
6640 2503

Enclosure: Attachment 1: Detailed OEH comments – White Rock Wind Farm MOD 4

Attachment 1: Detailed OEH Comments - White Rock Wind Farm MOD 4

Biodiversity matters

The Office of Environment and Heritage (OEH) has reviewed the Environmental Assessment Report prepared by Goldwind Australia dated December 2016, and particularly Appendix E which summarises the offset requirements for the modification.

The modification proposes new biodiversity impacts in addition to those already assessed for the project approval. As such the OEH was anticipating that the Framework for Biodiversity Assessment (FBA) would have been followed and a Biodiversity Assessment Report (BAR) provided. Although this hasn't occurred, the Environmental Assessment and the further information provided by ELA has provided most of the information required to enable the OEH to assess the proposal.

Further, the vegetation mapping for the site which was originally undertaken by Environmental Assessment Pty Ltd and then reviewed by Eco Logical Australia (ELA) is not of a standard that the OEH would expect for the vegetation communities identified. The OEH has discussed the limitations of the current vegetation mapping with ELA. On this occasion the OEH will accept the current mapping due to a number of reasons including the level of vegetation impact factored into the impact credit calculations, the degraded state of the majority of the vegetation along the alignment, and the existing rural uses of the properties involved.

The OEH has considered the impact credit calculations as detailed in Table 2 of the ELA letter dated 2 December 2016 which forms Appendix E of the Environmental Assessment. The OEH agrees with the impact and credit calculations for the modification as stated in Table 2 for vegetation zones 1, 3 and 4, being:

- **42 credits** of BR271 Blakely's Red Gum – Yellow Box tall woodland in the Brigalow Belt South and Nandewar bioregions,
- **140 credits** of BR391 White Box grassy woodland on the Inverell basalts mainly in the Nandewar bioregion, and
- **27 credits** of BR330 Ribbon Gum – Rough-barked Apple – Yellow Box grassy woodlands of the New England Tablelands bioregion.

Further to the above impacts, the ELA letter has calculated the potential impacts to vegetation zones 2 and 5 being the Derived Native Grasslands (DNG) areas. The letter suggests that these areas will not be impacted. The impact credit calculations for the DNG areas in Table 2 are:

- **14 credits** of BR271 Blakely's Red Gum – Yellow Box tall woodland in the Brigalow Belt South and Nandewar bioregions, and
- **28 credits** of BR391 White Box grassy woodland on the Inverell basalts mainly in the Nandewar bioregion

Although there will be no direct impact on the DNG areas initially, the approval of the transmission line will require the ongoing removal of any large trees or shrubs along the alignment. As such these areas will not have an opportunity to naturally improve over time or be rehabilitated, which is deemed to be an indirect impact to these areas if the modification is approved.

Accordingly, the OEH recommends that the 42 credits generated for vegetation zones 2 and 5 should also be offset in addition to the 209 credits calculated for vegetation zones 1, 3 and 4. In total, the modification would be required to offset 251 credits for the vegetation communities identified in the impact area.

The OEH understands that the Construction Environment Management Plan (CEMP) will apply to the modification and that the CEMP will be updated to reflect both the proposed changes and the need for weed control works to be carried out along the transmission alignment as per condition E.22 (f) of the Project Approval. The OEH supports the requirement for weed control works to be undertaken for the modification area.

Recommendations

- That the applicant retires the required 251 credits as described in Table 2 of the Eco Logical Australia letter dated 2 December 2016 (Appendix E) to the satisfaction of OEH prior to the impacts occurring.

Aboriginal Cultural Heritage matters

An important component of the environmental assessment process undertaken in support of development proposals is the consideration of Aboriginal cultural heritage values. The OEH has reviewed the proposed modification and supports the actioning of the four (4) recommendations listed under *Indigenous Heritage*.

The OEH notes the footprint of the proposed modification has been re-positioned to avoid the two (2) Aboriginal objects identified during the Aboriginal cultural heritage assessment undertaken to support the modification application. The OEH supports the commitment to avoid harm to all known Aboriginal objects as the best management and conservation outcome.

The OEH further notes and supports the intention to update to the White Rock Farm Wind Farm Stage 1 Construction Heritage Management Plan (CHMP) to manage the implementation of the recommendations relating to the procedures to follow relating to the identification and management of unexpected finds within the footprint of the proposed modification. The proposed update of the CHMP should be developed in consultation with the Aboriginal stakeholders for the project and the OEH.

Recommendations:

- That the recommendations of the Environmental Assessment report relating to Indigenous heritage are implemented, and
- The proposed update of the CHMP be developed in consultation with the Aboriginal stakeholders for the project and the OEH.