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Ms Natasha Homsey  
Environmental Assessment Officer, Resource & Energy Assessments  
Department of Planning & Environment  
natasha.homsey@environment.nsw.gov.au

Dear Natasha

#### **Flyers Creek Wind Farm Mod 4 - Exhibition - OEH response**

Thank you for your invitation for the Office of Environment Heritage (OEH) to comment on the proposal to modify the Flyers Creek Wind Farm project.

OEH understands that the modification involves:

- increasing turbine dimensions, including blade length and hub height (resulting in a total turbine height increase from 150 m to 160 m); and
- including a new 132kV transmission line and switching station to enable the Project to connect to the electrical grid.

OEH understands that, in accordance with Section 7.17 of the Biodiversity Conservation Act 2016, the proponent will be lodging a Biodiversity Development Assessment Report (BDAR) prior to project determination. OEH has undertaken a general review of the Biodiversity Assessment provided and will provide a more detailed review once the BDAR has been received.

OEH has reviewed the Bird and Bat Assessment Impact (BBAI) noting that the 10-metre increase in blade length results in a 56% increase in the rotor swept area (RSA). This modification increases the RSA to 15,394 m<sup>2</sup> and brings the minimum RSA to 20 m above ground as opposed to the previous 30m. This would bring the lower sweep of the blades to approximately tree height. The BBAI notes that Superb Parrots characteristically flies at tree canopy height, although three of the ten flights recorded were within RSA, at between 20 and 50 metres. The BBAI states that, as most of the wind farm comprises untreed ridges, only a small proportion of the turbines are likely to have Superb Parrots flying near them. The activities of Superb Parrots on the site will be monitored through the implementation of the Bird and Bat Adaptive Management Plan (BBAMP). OEH expects that the BBAMP should incorporate a monitoring program that will cover the period of occupancy Superb Parrots are on the site, and at a frequency that will provide adequate data on flight patterns to identify, and mitigate for, at risk behaviours.

A review of the Biodiversity assessment has identified a number of deficiencies that should be addressed in the BDAR:

- Details of the avoidance and mitigation measures implemented for the modification, particularly why further avoidance of Box Gum Woodland EEC, for example the EEC along Panuara Road depicted in Vegetation Map 5, is not possible;
- Adequate survey effort for threatened species, at the appropriate time, in accordance with the OEH Survey Guidelines; and
- An assessment of the offset requirements for the predicted impacts, based on a worst-case scenario.

Should you require further information regarding issues that are the responsibility of the OEH please contact David Geering on 02 6883 5335 or [david.geering@environment.nsw.gov.au](mailto:david.geering@environment.nsw.gov.au).

Yours sincerely

A handwritten signature in black ink, appearing to read 'Peter Christie', is centered within a light gray rectangular box.

**PETER CHRISTIE**  
**Director, North West**  
**Conservation and Regional Delivery**

24 August 2018

Contact officer: DAVID GEERING  
6883 5335