

WHITE ROCK WIND FARM MODIFICATION 6 – ASSESSMENT OF AMENDED APPLICATION

Summary

The Department acknowledges Goldwind's request for an increased clearing limit to address the installation of Stage 2 underground cabling within the area of the constructed Stage 1 project footprint (herein referred to as the revised cabling design).

It is acknowledged that this need has arisen following the identification of previously unforeseen challenges for the cabling design and its implementation within the Stage 1 area.

To correctly account for the vegetation clearing requirements for both the modification application and the revised cabling design, it was considered beneficial that these impacts be captured in the form of an amendment to the current modification application before the Commission for determination.

To support its request, a revised Biodiversity Assessment Report (BAR) was prepared to account for the increased impacts as a result of the revised cabling design.

In summary, the revised design would involve clearing of an additional 7 hectares (ha) of native vegetation comprising similar vegetation types to those identified in the Department's Assessment Report. Overall, there would be a slight reduction of around 0.7 ha in overall impacts to threatened vegetation (EECs) from the modified project due to precautionary assumptions made in the previous BAR assessment.

Given the relatively marginal changes in clearing proposed, the proposed amendment would not change the Department's assessment that the modified project would not result in any significant impacts on EECs, subject to being appropriately offset.

Importantly, the revised credit requirements for the modified project (including the revised cabling design) are still expected to be less than the credits generated from the Goldwind's proposed offset (the Tangari BioBanking site).

In regard to threatened species, the Biodiversity Conservation Division (BCD) was satisfied with the assessment undertaken but raised concerns about the lack of targeted surveys undertaken for Koala, which was inconsistent with the requirements of the Framework for Biodiversity Assessment (FBA).

Although acknowledging that any Koalas would likely be at low population densities (if present at all), the BCD recommended that a requirement for additional targeted surveys within the revised cabling area should be included in any conditions of approval to satisfy the FBA requirements. Accordingly, the Department has recommended a condition to this effect.

Should any additional credits be required following this assessment, Goldwind would be required to discharge this obligation in accordance with the NSW Biodiversity Offsets Scheme. However, it is noted that over 80% of the Tangari BioBanking site is considered suitable Koala habitat.

In summary, the Department remains satisfied that the modified project (including the revised cabling design) can be undertaken in a manner that maintains the biodiversity values of the locality over the medium to long term, with the implementation of the recommended mitigation and offsetting measures.

The Department therefore retains its position that the proposed modification is in the public interest and is approvable, subject to the recommended revised conditions.

Native Vegetation Impacts

NGH Environmental prepared a revised BAR on behalf of the Goldwind including the results of additional ecological surveys undertaken to verify and assess the impacts of the revised cabling routes. The BCD advised it was satisfied with the native vegetation assessments presented in the revised BAR.

Table 1 provides a summary of the revised vegetation impacts. No threatened flora species were observed in the areas surveyed.

Table 1 | Revised Vegetation Community Impacts (EEC listed in bold and italics)

Vegetation Community	PCT ID	Condition Class	Previous Extent of vegetation (ha) impacted	Revised Extent of vegetation (ha) impacted
<i>Blakely's Red Gum - Yellow Box grassy woodland of the New England Tableland Bioregion</i>	<i>PCT #510</i>	<i>Moderate – good</i>	<i>7.95</i>	<i>9.83</i>
<i>Blakely's Red Gum - Yellow Box grassy woodland of the New England Tableland Bioregion</i>	<i>PCT #510</i>	<i>Low</i>	<i>0.51</i>	<i>0.51</i>
<i>Ribbon Gum - Mountain Gum - Snow Gum grassy open forest or woodland of the New England Tableland Bioregion</i>	<i>PCT #554</i>	<i>Moderate – good</i>	<i>61.92</i>	<i>59.36</i>
Ribbon Gum - Mountain Gum - Snow Gum grassy open forest or woodland of the New England Tableland Bioregion	PCT #554	Low	77.70	82.19
Silvertop Stringybark – Mountain Gum grassy open forest of the New England Tableland Bioregion	PCT #565	Moderate – good	12.33	15.73
River Oak - Rough-barked Apple - red gum - box riparian tall woodland (wetland) of the Brigalow Belt South Bioregion and Nandewar Bioregion	PCT #84	Moderate – good	0.14	0.14
<i>Black Sallee - Snow Gum grassy woodland of the New England Tableland Bioregion</i>	<i>PCT #507</i>	<i>Moderate – good</i>	<i>2.68</i>	<i>2.68</i>
Black Sallee - Snow Gum grassy woodland of the New England Tableland Bioregion	PCT #507	Low	5.34	5.34
Total Vegetation	-	-	168.57	175.78
Total EEC Impacts Only			73.06	72.38

In summary, the revised BAR identified that there would be around 7.2 ha of additional native vegetation clearing required (an increase from 168.6 to 175.8 ha), comprising of similar vegetation community types to those identified for the Stage 2 BAR.

Of the threatened vegetation communities to be impacted, the revised cabling design would result in clearing of an additional 1.85 ha of Box Gum Woodland EEC (PCT 510). However, due to precautionary assumptions made in the previous BAR assessment, there would be a net reduction in clearing of Ribbon Gum Woodland EEC (comprising both PCT 554 and PCT 507) by around 2.6 ha.

Consequently, there would be a slight reduction of around 0.7 ha in overall impacts to threatened vegetation (EECs) from the modified project and would not change the Department's assessment that the modified project would not result in any significant impacts on EECs, subject to being appropriately offset.

Should the Commission wish to approve the modification, the Department has recommended updating the biodiversity conditions in the project approval to reflect the following revised clearing limits:

- Ribbon Gum Woodland EEC: 90 ha, comprising the approved clearing limit of 28 ha and revised additional 62 ha of clearing for the modification application; and
- Box Gum Woodland EEC: 10.4 ha.

Threatened Species Impacts

The Department's Assessment Report concluded that the proposed modification would not result in any significant impacts on threatened species.

The Stage 2 BAR identified 11 threatened species requiring additional targeted surveys, all of which were undertaken except for 2 flora species (*Prasophyllum* sp. Wybong and Small Snake Orchid) and the Koala. The BCD accepted the reasons for not undertaking additional surveys for the *Prasophyllum* sp. Wybong and Koala.

However additional surveys for the Small Snake Orchid were recommended to confirm it is not present within the proposed Stage 2 disturbance areas.

Additional targeted surveys for the Small Snake Orchid were undertaken as part of the revised BAR but were not identified within the areas surveyed. However, the Department notes that Goldwind is not seeking to have this survey requirement removed from the conditions and that the results would be used for determining the final offset liability.

In regard to the Koala, the revised BAR assessment concluded that Koalas were not present as no Koala scats or any other evidence of Koala habitation were found during random field inspections of the proposed cabling areas and given the lack of Koala records across the whole project area.

Although acknowledging that any Koalas would likely be at low population densities (if present at all) within the revised cabling areas, the BCD recommended that a requirement for additional targeted surveys should be included in any conditions of approval in order to satisfy the requirements of the Framework for Biodiversity Assessment (FBA).

Accordingly, should the Commission wish to approve the modification, the Department has recommended a condition to this effect.

Should any additional credits be required following this assessment, Goldwind would be required to discharge this obligation in accordance with the NSW Biodiversity Offsets Scheme. However it is noted that over 80% of Goldwind's proposed offset site is considered suitable Koala habitat.

Separate to the Department's assessment process, the revised BAR identified a population of Greater Glider (listed as Vulnerable under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act)) located in the southern part of the project close to the Stage 1 project area which was not previously identified. Goldwind has advised that it has provided this information separately as part of the Commonwealth EPBC referral process for the application.

Biodiversity Offset

The revised BAR includes an assessment of the ecosystem credits that would be required to compensate for the modification (including the revised cabling areas), as summarised below in Table 2.

Table 2 | Revised Ecosystem Credit Requirements

Plant community type name / PCT	Previous Credits required	Revised Credits required
Blakely's Red Gum - Yellow Box grassy woodland of the New England Tableland Bioregion [PCT #510]	482	594
Ribbon Gum - Mountain Gum - Snow Gum grassy open forest or woodland of the New England Tableland Bioregion [PCT #554]	3,445	3,302
Silvertop Stringybark – Mountain Gum grassy open forest of the New England Tableland Bioregion [PCT #565]	458	584
River Oak - Rough-barked Apple - red gum - box riparian tall woodland (wetland) of the Brigalow Belt South Bioregion and Nandewar Bioregion [PCT #84]	5	5

Plant community type name / PCT	Previous Credits required	Revised Credits required
Black Sallee - Snow Gum grassy woodland of the New England Tableland Bioregion [PCT #507]	157	157
Total	4,547	4,642

In total, 4,642 ecosystem credits would be required to offset the impacts arising from the proposed modification, an increase of 95 credits.

The Department notes that the total revised credit requirements for the modified project (ie. 5,911 credits) are still expected to be less than the credits generated from the Tangari BioBanking site, which is expected to generate around 6,505 ecosystem credits.

Notwithstanding, there would be no change to the current recommended conditions that require Goldwind to either demonstrate that the Tangari BioBanking site provides sufficient credits for the Stage 2 disturbance areas or to prepare an updated Biodiversity Offset Package prior to the commencement of construction of Stage 2 detailing how the proposed final offset credit obligation would be discharged.

Evaluation

Overall, while the proposed amendment to the application would result in clearing of an additional 7 hectares (ha) of native vegetation, there would be a slight reduction of around 0.7 ha in overall impacts to threatened vegetation for the modified project. Importantly, the revised credit requirements for the modified project are still expected to be less than the credits generated from Goldwind's proposed offset site.

Accordingly, the Department remains satisfied that the modified project can be undertaken in a manner that maintains the biodiversity values of the locality over the medium to long term, with the implementation of the recommended mitigation and offsetting measures as supported by the BCD.

The Department therefore retains its position that on balance the proposed modification is in the public interest and is approvable, subject to the recommended updated conditions.