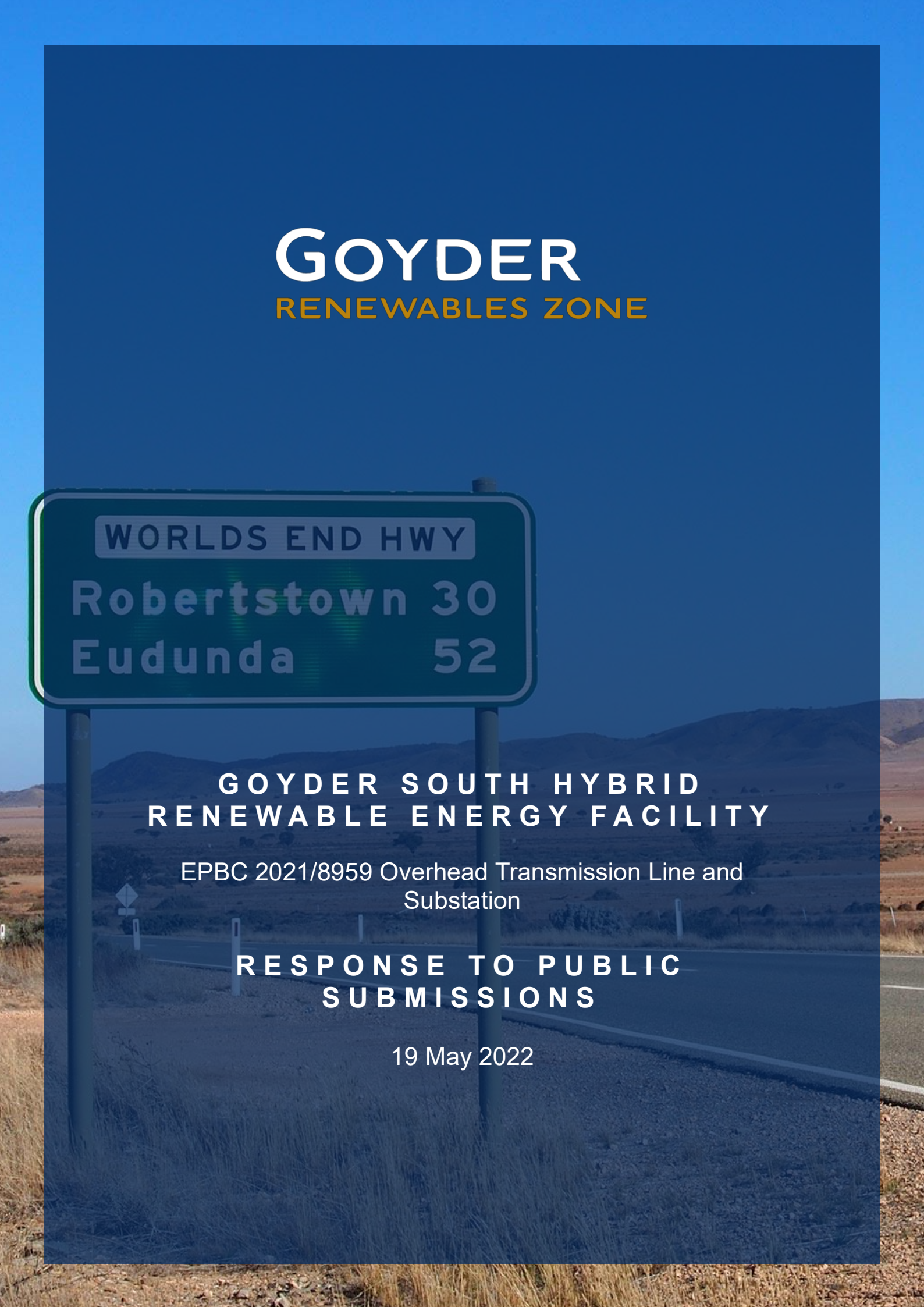
GOYDER
RENEWABLES ZONE



GOYDER SOUTH HYBRID RENEWABLE ENERGY FACILITY

EPBC 2021/8959 Overhead Transmission Line and Substation

RESPONSE TO PUBLIC SUBMISSIONS

19 May 2022

Response to Public Submissions

Contents

APPENDICIES

NEOEN

1 Introduction

This Response to Public Submissions (Response) report provides an overview of the public exhibition process associated with EPBC application 2021/8959 - Goyder South Hybrid Renewable Energy Facility – Overhead Transmission Line and Substation (OTL&SS).

Neoen is proposing to develop a hybrid renewable energy project comprising wind, solar and battery technology. The project will be constructed in stages with the first stage (Stage 1) comprising approximately one third of the wind turbines, a substation, an overhead transmission line and a battery/grid connection.

The **OTL&SS** will be part of this first stage of construction and comprises a new substation (located approximately 10km south of Burra, SA) and a transmission line (through the Worlds End valley) which will connect the new sub-station to the existing Robertstown Substation (located approximately 5km north-east of Robertstown, SA). This action is proposed by the legal entity **Goyder Wind Farm Common Asset Pty Ltd** where the parent Goyder company is Neoen Australia Pty Ltd.

EPBC Application Process

Neoen has lodged an EPBC application for Wind Farm 1B with the Department of Agriculture, Water and the Environment (DAWE) - the Agency responsible for the administration of the ***Commonwealth Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act)***.

DAWE have undertaken a preliminary evaluation and determined that this portion of the project is a controlled action and will be assessed by preliminary documentation. The proposed action has the potential to have an impact on ***Listed Threatened Species*** **and Communities** (s18 and s18A), which are protected under Part 3 of the EPBC Act.

The draft Preliminary Documentation was placed on public exhibition from 4th May to the 18th May 2022 (10 business days). The notice for the public exhibition was placed in the Adelaide Advertiser (being a State-wide daily newspaper) and the Plains Producer (being a regionally based, weekly publication).

A copy of all of this material was made available at the following locations:

- On the project web site - https://goyderenergy.com.au
- Neoen Burra shopfront: 7-9 Commercial St Wednesday-Thursday 10.00am – 4.00pm or by appointment
- Council Office Burra: 1 Market Square, Mon-Fri 9.00am – 5.00pm
- Robertstown War Memorial Community Centre – 7 Commercial St, Monday-Friday 9.00am – 5.00pm
- Yorke and Mid North Regional Office DEW: 155 Main North Road Clare, Monday-Friday 9.00am – 5.00pm.

During this time two submissions were received, a copy of which is contained in Appendix A. The issues raised in the submissions are summarised in the following section.

Neoen's response to the issues raised in the submissions is contained in Section 3.

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2 Summary of Issues Raised

As previously identified, the Preliminary Documentation was placed on Public Exhibition between the 4th May to the 18th May 2022. Two submissions were received during this period from:

- [redacted] (received on 17/5/22)
- [redacted] (received 18/5/22)

A copy of the submissions is included in Appendix A. Please note that personal details have been redacted.

The issues raised in these submissions are summarised below and addressed in detail in the following section.

2.1 [redacted] Submission

The [redacted] submission identifies a number of general environmental impact issues, some of which are more relevant to the State level of assessment than an EPBC assessment of Matters of National Environmental Significance.

However, this submission does highlight several issues including:

- the overall impact for the region (Burra Creek, hilltops, Gorge)
- Referencing the Relevant Recovery Plans;
- Impact on Pigmy Blue Tounge lizards and birds

This submission is addressed in more detail in Section 3.

2.2 [redacted] Submission

The [redacted] submission raises issues relating to the impact of the project on southern hairy-nosed wombat (SHNW) populations in the area. The submission identifies concerns about the identification of populations and their warrens, the potential for impact on these populations and the approach proposed to manage such impacts.

The SHNW is not an EPBC listed species and therefore not relevant to the EPBC referral process. As such this submission has not been addressed in detail, but the following is provided for information.

The initial survey work identified the presence of SHNWs and Neoen understand the longer-term infrastructure management issues that can be associated with wombat populations and has instructed its contractor to minimise impacts in accordance with DA obligations.

Where SNHWs are present at infrastructure locations, management will occur according to a Wombat Management Plan currently under preparation for the Construction and Operation phases of the project.

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3. Issues Analysis and Response

It is emphasised that, in addition to the issues raised that are relevant to an EPBC Assessment, some of the issues raised are more relevant to State level legislation. Issues raised that are not relevant to any legislative assessment have not been included in the summary.

This project has been assessed by the State-level independent assessment authority which took into account submissions made during the public consultation period (19/8/20-18/9/20). The project has also been assessed by the State-level Native Vegetation Council. Both applications have been approved with appropriate Conditions including the requirement for a project-specific CEMP.

3.1 Response to [redacted] Submission

The following table addresses the matters raised in the Dunstan submission.

Comments received from J[redacted] via email RE: 2021/8959 - Goyder South Overhead Transmission Line (OTL) and Substation	
Comment	**Response**
In regards to the Goyder South Hybrid Renewable Energy Facility Wind Farm projects, I wish to express concerns in response to the preliminary documentation provided. Do EBS ecology and Neoen understand the overall importance as an entirety, for example, Porter Lagoon, Apoinga Lagoon, Burra Creek, Hopkins Creek, Reed Creek, the Tothill Range and lagoons to the east of these areas.	EBS Ecology and Neoen have a thorough understanding of the environment within and surrounding the Project Area, as evidenced by the significant efforts made to avoid sensitive areas within the region. As outlined in Section 2.2.1 of the Preliminary Documentation (page 12) "*Neoen have undertaken a significant and extensive amount of technical investigations during the planning phase to identify potential impacts of the proposed action on the environment and have adjusted the design, particularly the location and layout of infrastructure, as much as possible and practicable, to avoid and minimise impacts on the environment.*" As stated in Section 2.2.2 (page 13) of the Preliminary Documentation "*EBS Ecology has undertaken ecological studies of the Project Area on behalf of Neoen and other parties since a wind farm was first proposed for the area in 2008. This includes both baseline flora and fauna studies and targeted surveys for threatened species, as outlined in Table 7"* (which references ten separate ecological surveys/assessments undertaken for the Goyder South Project). As stated in Section 2.4.5 (page 31) of the Preliminary Documentation, "*the OTL* [Overhead Transmission Line] *will cross Burra Creek in two locations. One crossing will be approximately 2.5 km east of Substation West, where the direction of the OTL is west-east and where Burra Creek is flowing in a southerly direction. The other crossing will be where the direction of the OTL is north-south and where Burra Creek is flowing in an easterly direction towards the Mimbara Conservation Park (which is outside of the Goyder South Project Area). The OTL*

	will also cross numerous small ephemeral creeks and drainage lines. There is one ephemeral drainage line located approximately 100 m south of substation west, which flows towards the east." In particular, the *Goyder South Hybrid Renewable Energy Facility: Flora and Fauna Assessment* (EBS Ecology 2020) documents the findings of ecological assessment undertaken for the Goyder South Project. For example (page 17): "*Burra Creek Gorge Reserve holds ecological significance for the local area; River Red Gums (Eucalyptus camaldulensis) feature along the Burra Creek and provide important habitat for birds and other wildlife … World's End Gorge is an area rich in biodiversity, with mallee scrubland, peppermint grassy woodland and tussock grassland communities present within the Gorge. Neoen has committed to implementing a 3 km buffer from Burra Creek Gorge campground to the nearest proposed wind turbine."* Furthermore, Section 6.2 (page 44-45) describes the vegetation associations within the Goyder South Project Area, including variation identified between eastern and western sectors, with each sector comprised of two parallel ridges (i.e. ranges): "*The vegetation attributes of the Project Area can be separated in to eastern and western sectors, which are divided by Burra Creek. Each sector is comprised of two parallel ridges. The western ridges were categorised as an agricultural zone landscape, within which native vegetation consisted of grasslands and tall woodlands of moderate quality, of which the woodland was mostly represented by Eucalyptus leucoxylon ssp. pruinosa (Inland South Australian Blue Gum). There was extremely low vegetation remnancy in the western sector due to extensive cropping. Where remnant vegetation occurred, stock had degraded the quality of the vegetation. Where remnant woodlands occurred in the western sector, there were considered important for the conservation of regional fauna species (see Section 7.3.2), many of which are now threatened due to habitat loss.* *The eastern ridges receive lower rainfall than those in the west, and therefore, pastoral land practices were more widely used than agricultural land practices. Vegetation communities were also reflective of lower rainfall, comprising of native pine and Mallee woodlands, and chenopod shrublands. While stock grazing had degraded the quality of these vegetation communities, all the vegetative stratums were intact. The vegetation communities within the eastern ridges have higher remnancy due to their low agricultural value.*" Additionally, Section 6.6 (page 84) outlines key habitat features including "*Numerous creeklines and low lying areas – providing ephemeral flowing water and pooled water potentially utilised by a range of terrestrial and aquatic fauna … Burra Creek was flowing at the time of the surveys.*" As stated in Section 5.1.4 (page 38) "*Porter Lagoon may provide a refuge for waterbirds such as the Banded Stilt (Cladorhynchus leucocephalus), Red-necked Avocet (Recurvirostra novaehollandiae), waterfowl and other waders during good seasons where water is plentiful.*" As such, EBS Ecology and Neoen have a thorough understanding of the environment, including the creeks, lagoons and ranges within and surrounding the Project Area.
My concerns expand to question whether the following recovery plans have been taken into serious consideration. There is a significant aspect of each of these plans	As outlined in Section 1.5 of the *Preliminary Documentation* (page 8) the *Recovery Plan for the Pygmy Bluetongue Lizard Tiliqua adelaidensis*, the *National Recovery Plan for the Peppermint Box (Eucalyptus odorata) Grassy Woodland of South Australia ecological community 2012* and the *National Recovery Plan for*

missing from any reports provided; Recovery Plan for the Pygmy Bluetongue Lizard, Recovery Plan for Peppermint Box (Eucalyptus odorata) Grass Woodlands of South Australia, Recovery plan for the Iron-Grass Natural Temperate Grassland South Australia.	*the Iron-grass Natural Temperate Grassland of South Australia Ecological Community* have been referred to (as a minimum) during preparation of the Preliminary Documentation.
Burra Creek and the thousands of birds in wet and dry seasons, and the seasonal migration of birds and animals to the Tothill ranges from the east is an example of one crucial aspect of the area that is neglected throughout these reports.	Neoen has recognised the ecological significance of Burra Creek, wet and dry seasons, and migratory birds. For example, the *Goyder South Hybrid Renewable Energy Facility: Flora and Fauna Assessment* (EBS Ecology 2020) states (page 17): "*Burra Creek Gorge Reserve holds ecological significance for the local area; River Red Gums (Eucalyptus camaldulensis) feature along the Burra Creek and provide important habitat for birds and other wildlife … World's End Gorge is an area rich in biodiversity, with mallee scrubland, peppermint grassy woodland and tussock grassland communities present within the Gorge. Neoen has committed to implementing a 3 km buffer from Burra Creek Gorge campground to the nearest proposed wind turbine."* As stated in Section 5.1.4 (page 38) "*Porter Lagoon may provide a refuge for waterbirds such as the Banded Stilt (Cladorhynchus leucocephalus), Red-necked Avocet (Recurvirostra novaehollandiae), waterfowl and other waders during good seasons where water is plentiful.*" Additionally, Section 6.6 (page 84) outlines key habitat features including "*Numerous creeklines and low lying areas – providing ephemeral flowing water and pooled water potentially utilised by a range of terrestrial and aquatic fauna … Burra Creek was flowing at the time of the surveys.*" As outlined in Section 9.1 of the Preliminary Documentation (page 142): *"Burra Creek Gorge holds ecological significance for the local area and is rich in biodiversity. Neoen has instituted a voluntary 3 km setback from Burra Creek Gorge campground to minimise impact to this area. Furthermore, the area is going to be acquired by Neoen and protected as an offset"* (for native vegetation Significant Environmental Benefit). As noted elsewhere, Neoen is currently in advanced discussions with the SA Department of Environment and Water to transform this area into a national park.
Are Neoen aware that the hilltops running north and south are the last refuge for flora and fauna as this is the only area absent of cultivation and large-scale chemical spraying? Have they considered the private conservation efforts that have been under development and self-maintained in the area for years?	As stated above, Neoen have a thorough understanding of the environment within and surrounding the Project Area. Information on the hilltops running north and south within and across the Goyder South Project Area is provided in the *Goyder South Hybrid Renewable Energy Facility: Flora and Fauna Assessment* (EBS Ecology 2020). In particular, (page 44-45) "*The western ridges were categorised as an agricultural zone landscape, within which native vegetation consisted of grasslands and tall woodlands of moderate quality, of which the woodland was mostly represented by Eucalyptus leucoxylon ssp. pruinosa (Inland South Australian Blue Gum). There was extremely low vegetation remnancy in the western sector due to extensive cropping. Where remnant vegetation occurred, stock had degraded the quality of the vegetation. Where remnant woodlands occurred in the western sector, these were considered important for the conservation of regional fauna species (see Section 7.3.2), many of which are now threatened due to habitat loss.* *The eastern ridges receive lower rainfall than those in the west, and therefore, pastoral land practices were more widely used than agricultural land practices. Vegetation communities were also reflective of lower rainfall, comprising of native pine and Mallee woodlands, and chenopod shrublands. While stock grazing had degraded*

	the quality of these vegetation communities, all the vegetative stratums were intact. The vegetation communities within the eastern ridges have higher remnancy due to their low agricultural value." Although some areas are absent of cultivation and large-scale chemical spraying, some areas have been degraded by grazing and are not unaffected habitat. As outlined in Section 9.1 of the Preliminary Documentation (page 141): *Neoen have undertaken a significant and extensive amount of technical investigations during the planning phase to identify potential impacts of the proposed action on the environment and have adjusted the design, particularly the location and layout of infrastructure, as much as possible and practicable, to avoid and/or minimise impacts on the environment."* And (page 141-142): *"All stages of the Goyder South Project design have been undertaken with consideration of vegetation mapping, threatened ecological community mapping and the known locations of threatened species populations and habitat..."* Furthermore, as outlined in Section 9.2 of the Preliminary Documentation (page 144): *"The design has specifically been amended, wherever possible, to avoid and/or minimise impacts to MNES and areas of high conservation and biodiversity value, and impact areas considered to have lower conservation and biodiversity value. For example, infrastructure has been located within areas of cropping land, which are more highly disturbed and unsuitable habitat for MNES, including INTG TEC… and other areas outside of INTG TEC… to avoid and/or minimise impact to INTG TEC… wherever possible."* In response to the comments regarding private conservation, Neoen are aware of at least two private conservation areas located adjacent to the Project Area, with these discussed in Section 2.4.2 of the Preliminary Documentation (page 27): "*Two private conservation areas are located adjacent to the Project Area:* - *Read Creek; and* - *Hallelujah Hills"* Both of these private conservation areas are located south of Burra Creek, with Read Creek approximately 3.5 km and Hallelujah Hills approximately 3.4 km West of the OTL. As such the Project will not have any impact on either of these two private conservation areas. Neoen also notes that it has an excellent relationship with Worlds End Conservation (WEC) Pty Ltd, which manages the approximately 511 ha privately-owned property (under a heritage agreement) in the Hallelujah Hills. This land directly borders the Hopkins Creek Conservation Park, which in turn borders the southern edge of the Worlds End Gorge SEB offset area. The addition of the Gorge offset land will result in an unbroken 9 km corridor of protected area through the hill range. Neoen and EBS staff accompanied WEC Pty Ltd on a tour of their property in 2019 to gain a broad understanding of the group's activities and needs. The parties subsequently agreed that Goyder South would provide annual funding to WEC Pty Ltd throughout the life of the project to support conservation activities.
If Neoen and EBS ecology had the knowledge of these recovery plans and the areas can they explain to the EPBC how	Neoen are following and meeting the requirements of state and federal environmental departments.

they justify to still challenge the state and federal environmental departments with a single environmental consultation. Can they explain how bull dozing, blasting and managing a windfarm will improve any part of this area more than the current work, and to justify the cost benefit ratio that seems to be obvious.	As stated in Section 2.4.2 of the Preliminary Documentation (page 27) "*The local land use planning policy specifically envisages renewable energy projects as an appropriate land use, subject to avoiding or minimising impacts in accordance with relevant policy.*" As explained previously (above) impacts have been avoided and minimised as much as possible. The costs and benefits and scale of impact associated with the Project are outlined in Section 3.3 of the Preliminary Documentation (page 44-46), including: "*There are a number of costs and benefits that are relevant at a State level and include:* - *Benefit - placing downward pressure on electricity prices in South Australia;* - *Benefit – supporting a transition to clean energy generation;* - *Benefit – the protection of the Worlds End Gorge;* - *Cost – impact of construction traffic on State and Regional roads; and* - *Cost – change to visual character of landscape (noting that the area is already substantially modified from a 'natural' state.* Potential short- and long-term costs and benefits at a localised level are further summarised in Table 13 (on page 44). Neoen are committed *"to undertaking local on-ground Significant Environmental Benefit and Offsets (for State Based Native Vegetation Assessment and EPBC) where possible (including Worlds End Gorge, local conservation properties and local farming landholdings)*" (page 45). From a broader perspective, Neoen also suggests that local environments should not be considered entirely in isolation from climate outcomes. The renewable energy transition is vital to combating climate change, which will have, and is already having, catastrophic effects across Australia. For example, the greenhouse emissions displaced by Goyder South Stages 1A and 1B, which cannot proceed without the ancillary infrastructure which is the subject of this response, are roughly equivalent to planting 4.4 million trees. In summary, Neoen believe the benefits of Goyder South Stage 1, including the OTL and Substation West, strongly outweigh the costs at both a local and national level.
Where is the study specifically on the pygmy bluetongue lizards that describes the survival likelihood and sources of food available if the proposed project is approved, and a windfarm is erected in the middle of their habitat? Similarly, where is the study showing the survival likelihood and sources of food and shelter where the proposed relocation would take place? I personally suggest that pages 13-14 of the Recovery Plan for the Pygmy Bluetongue Lizard is reviewed and specifically addressed.	Section 7.13 (including subsections) in the Preliminary Documentation (page 118-123) outlines the potential impact to PBTL by the OTL and Substation West. In particular (page 121), "*No PBTLs were observed within the vicinity of the OTL and Substation West. No likely or potential PBTL habitat occurs within the vicinity of the OTL and Substation West. As such, the OTL and Substation West will not impact upon PBTLs or PBTL habitat."* As such, these comments are not relevant to the OTL and Substation West. However, these comments have been addressed in the *Goyder South Hybrid Renewable Energy Facility EPBC 2021/8957 Wind Farm 1B Response to Public Submissions* document and the response to these comments is included below. Section 8.5 (including subsections) in the Preliminary Documentation for Stage 1B discusses the likely direct and potential indirect impacts to PBTLs associated with the Project, including potential noise and/or vibration

	impacts, potential habitat fragmentation impacts, and potential shadow flicker impacts. The following references are provided as examples: Section 8.5.1 (page 159): "*In summary, all of the PBTLs located within the Stage 1B Project Area, may not be adversely impacted by turbine noise and/or vibration as they are located 250 m or more from a WTG*." Section 8.5.2 (page 163): "*Based on the current knowledge of the species (as outlined above) and the Project layout, it is considered unlikely that the Project will cause significant, or increase, habitat fragmentation to the population of PBTLs within the Project Area*." Section 8.5.4 (page 164) "*In summary, none of the PBTLs located within the Stage 1B Project Area are likely to be adversely impacted by turbine shadow flicker as they are located 250 m or more from a WTG*." Unfortunately, there is a significant lack of study on Pygmy Blue-tongue Lizards (PBTLs) located within or adjacent to a wind farm. As outlined in Section 11.1 (page 195) of the Preliminary Documentation for Stage 1B: "*Only one known study has been undertaken to date specific to the potential impact of a wind farm on PBTLs and it was associated with the Hornsdale Wind Farm*. *An annual PBTL monitoring program is also being undertaken at Hornsdale Wind Farm and monitoring data collected to date suggests that the PBTL population is currently remaining stable. However, this is based on limited data and further monitoring will determine the trajectory or stochasticity of the PBTL population within the Hornsdale offset area*." As outlined in Section 11.1.1 (page 197): "*Although the PBTLs within the Hornsdale offset area are located within approximately 220 – 800 m of wind turbines, monitoring data collected to date suggests that the PBTL population is currently remaining stable. This suggests that PBTLs located approximately 220 m (or more) away from wind turbines may not be adversely impacted by turbine vibration, noise and/or shadow flicker. However, this is based on limited data and further monitoring will determine the trajectory or stochasticity of the PBTL population within the Hornsdale offset area.*" More detailed information is provided in the Preliminary Documentation for Stage 1B. In response to the comment "*Similarly, where is the study showing the survival likelihood and sources of food and shelter where the proposed relocation would take place?*" Neoen provide the following: As outlined in Section 7.18 of the Preliminary Documentation for Stage 1B (Table 68 on page 139; Table 69 on page140): *It is estimated that approximately 1 individual PBTL may require relocation in Stage 1B if micro-siting of infrastructure cannot avoid impact to this PBTL."* As stated in Section 8.6 (page 164) of the Preliminary Documentation for Stage 1B: "*Where micro-siting cannot avoid direct impact to PBTLs, the individual(s) will be relocated to the nearest suitable release site in accordance with the procedure outlined in the Goyder South Hybrid Renewable Energy Facility PBTL Management Plan (EBS Ecology 2021a)."*

	A detailed PBTL relocation procedure, which includes post-relocation monitoring, has been developed by EBS Ecology and is presented in Section 12 of the *Goyder South Hybrid Renewable Energy Facility Draft PBTL Management Plan* (EBS Ecology 2021). The relocation procedure has been developed by ecologists with experience working with PBTLs and with consideration of findings presented in various scientific papers concerning relocation/translocation of PBTLs. As outlined in Section 12 (page 59) "*PBTLs will be relocated to the nearest suitable relocation release site(s) as identified by the ecologist(s).*" and "*If the ecologist(s) identifies a low number of PBTLs (up to ten) required to be relocated from a given area, and there is a population directly adjacent (e.g. within approximately 50 – 100 m), the ecologist(s) may decide to release the PBTLs into the adjacent population immediately, following assessment of the release site.*"
	
	As only a very small number of PBTLs are expected to potentially require relocation (approximately 1 PBTL) and they are expected to be relocated into the adjacent population, sources of food and shelter will be available (evident from the existing population of PBTLs). Furthermore, the risk of inflicting additional pressure on the existing PBTL population and sources of food and shelter is expected to be negligible due to the very small number of PBTLs expected to potentially require relocation.
	
	In response to the comment "*I personally suggest that pages 13-14 of the Recovery Plan for the Pygmy Bluetongue Lizard is reviewed and specifically addressed*" Neoen provide the following:
	
	Page 13-14 of the *Recovery Plan for the Pygmy Bluetongue Lizard Tiliqua Adelaidensis 2012* outline known and potential threats to for PBTL, including:
	
	- Changed land use
	  ○ Ploughing
	  ○ Ripping
	  ○ Inappropriate Grazing Regimes
	  ○ Other Agricultural Development
	  ○ Urban, Industrial and Infrastructure Development
	- Weeds
	
	Other threats are outlined on page 15-17.
	
	All of the known and potential threats to PBTL identified and outlined in the Recovery Plan are summarised in Section 8.3 of the Preliminary Documentation for Stage 1B (Table 72 on page 146-147).
	
	The likely direct impacts and potential indirect impacts to PBTLs associated with the Project are outlined in Section 8.5 (including sub-sections) of the Preliminary Documentation for Stage 1B (page 156 - 164).

If Neoen purchases land to compensate for the wind farm and loss of developed habitats in that area, can they explain how the animals and birds that will be forced out of that area will survive? Are these fauna expected to sit on the fence and wait for seedlings to have hollows, nectar and nest	It is assumed that the reference to the "purchase of land" relates to the Worlds End Gorge purchase. It is important to note that this relates to the requirements of the State level *Native Vegetation Act, 1991*. Neoen has made an application under this legislation, which has now been approved. A condition of this approval is the provision of a "Significant Environmental Benefit" (SEB) which can take the form of a substantial payment into the Native Vegetation Fund or an on-ground proposal. Neoen have opted for the on-ground option in the form of purchasing land containing the Worlds End Gorge. This approach is considered significantly superior to paying

sites and a productive understory? Most animals in the area are territorial. How does Neoen address this issue of animal behaviour disruption, alongside the basic loss of habitat?	into a Fund where the money could be spent anywhere in the state and not necessarily re-invested in local protections. Neoen disagree with the premise of the comment that animals will be forced out as significant amounts of habitat will remain within the OTL and Substation West Project Area. The Project infrastructure occupies a very small percentage of the overall Project Area. Furthermore, as outlined throughout Section 7 of the Preliminary Documentation and summarised in Section 7.14 (page 124), the only Matter of National Environmental Significance (MNES) that the OTL and Substation West is likely to have a significant impact on (in accordance with the *Matters of National Environmental Significance: Significant impact guidelines 1.1 Environment Protection and Biodiversity Conservation Act 1999* (DotE 2013)) is the Iron-grass Natural Temperate Grassland of South Australia TEC. As such, Neoen propose to implement an environmental offset in accordance with EPBC Act requirements. As outlined in Section 9.4 (page 147) of the Preliminary Documentation: "*As impacts to INTG TEC cannot be fully avoided or mitigated, an environmental offset is proposed to compensate for residual impacts to INTG TEC."* As such, Neoen will achieve the offsets required in accordance with relevant State (*Native Vegetation Act 1991*) and Commonwealth (*Environment Protection and Biodiversity Conservation Act 1999*) environmental legislation.
Can I ask about the proposed Bird Adaptive Management Plan. My understanding of this plan is that turbines will be erected, and monitoring of bird collision activity will be on-going. What is the expected cost of the birds endangered during this monitoring? How many birds need to be killed/impacted before action is taken? And what is the action expected to be? This area is already known to home critically endangered and vulnerable bird species, to which this monitoring plan is a major detrimental risk.	Comments on the Bird Adaptive Management Plan are not relevant to the OTL and Substation West as a Bird Adaptive Management Plan is not required for the OTL and Substation West. However, these comments have been addressed in the *Goyder South Hybrid Renewable Energy Facility EPBC 2021/8957 Wind Farm 1B Response to Public Submissions* document and the response to these comments is included below. As outlined in Section 10.6 (page 192-193) of the Preliminary Documentation for Stage 1B: "*The Bird Adaptive Management Plan (BAMP) will be prepared in accordance with DAWE's Onshore Wind Farms – interim guidance on bird and bat management document and will include, at a minimum, the following post-commissioning requirements outlined in the guidance document:* - *long-term site utilisation surveys;* - *long-term turbine collision monitoring;* - *reporting requirements to DAWE; and* - *adaptative management framework.* As outlined in Section 10.3.2 (page 189) of the Preliminary Documentation for Stage 1B: "*A risk assessment has been undertaken for each of the five bird species of national significance (Table 84) … The frequency of a collision event (with a turbine) causing mortality, is considered unlikely (the event could occur at some time) for four species or rarely (the event may only occur in exceptional circumstances) for one species, the Painted Honeyeater (Table 84). Based on the likelihood of occurrence and frequency of an event causing mortality, the consequence to each species has been determined. The consequence for all species is considered Nil /*

	Insignificant except for Grey Falcon where it is considered to be Minor (Table 84). The level of risk to each species, based on the risk assessment, is considered Low (Table 84)." It is not within Neoen's remit to comment on "*What is the expected cost of the birds endangered during this monitoring? How many birds need to be killed/impacted before action is taken? And what is the action expected to be?*" However, it is noted that technical solutions are becoming available to mitigate some forms of bird strike if a problem is detected, such as IdentiFlight bird detection and turbine shutdown technology. However, this technology is in its relative infancy and is enormously costly, and is appropriate only for deployment where an unacceptable impact is detected.
I express my deepest concerns of the company's lack of effort of awareness of this project to the area's tourism department and community in general since the initial rejected of the idea from the community and council against a previous energy company in the same area.	This comment does not seem to be related to any Matters of National Environmental Significance, the Project EPBC Referral or Preliminary Documentation, or any other EPBC Act matters. However, Neoen provide the following in response. Section 3.4 (including sub-sections) of the Preliminary Documentation (page 46-49) presents information on stakeholder consultation and outcomes. In particular: "*Neoen has undertaken a number of measures to support community engagement prior to the lodgment of the Development Application, including:* - *Holding one-on-one discussions with all residents within a 6 km radius (over 30 involved landowners and over 40 neighbours);* - *Appointing a Community Liaison Officer (based locally and with family background in the area);* - *Establishing a Community Office in main street of Burra (open part time);* - *Holding two Community Information Days (11/09/2019 and 6/11/2019);* - *Direct consultation with a range of stakeholders including Council, relevant State Agencies, mining explorers and operations, CFS, Friends of the Heysen Trail and local Police;* - *Meeting with any members of the community who sought discussions; and* - *Attending community and business events and presenting on the project as invited.* *The Development Application was formally released by the State Commission Assessment Panel (SCAP) for statutory public consultation on 18th August 2020 for a period of one month with a closing date of the 18 September 2020.* ***Outcomes*** *A total of 33 representations were submitted by members of the public,* ***of which more than two thirds expressed support or conditional support for the project****.* ***Neoen continue to engage*** *with the local community, Council and relevant stakeholders as they progress their more detailed design and firm up their approach to the Worlds End Gorge conservation project.*

	Additional community information sessions were held in Eudunda and Robertstown on 3 November 2021 and Burra on 4 November 2021." As such, Neoen has undertaken a significant amount of consultation and engagement for the Goyder South Project. With particular regard to tourism, Neoen disagrees strongly with the statement that it is unaware of the local context. For example, Neoen is in close consultation with the Goyder Regional Council, the Friends of the Heysen Trail (a popular long-distance walking trail which transits through the project and will likely be redirected through the Worlds End Gorge offset area) and Tourism SA, which has expressed a strong interest in the proposed Worlds End Gorge national park. All of these bodies have expressed their support for the project.
I understand the appeal and necessity of a balance between the environment and renewable energy. But in this case, it is clear that the impact made on the environment is much larger that the benefit this project would provide, both immediately and long term.	Neoen disagrees strongly with this assessment, which is unsupported by available evidence. The impact of the OTL and Substation West is not "*much larger than the benefit this project would provide, both immediately and long term*". In Neoen's extensive experience as a developer, owner and operator of renewable projects globally, it has encountered few sites as well-suited for wind infrastructure as Goyder South, which is located on exclusively agricultural land with minimal clearing required, and sufficient space for avoidance and setbacks from sensitive areas. Furthermore, as outlined in Section 2.2.1 of the Preliminary Documentation (page 14) "*Neoen have undertaken a significant and extensive amount of technical investigations during the planning phase to identify potential impacts of the proposed action on the environment and have adjusted the design, particularly the location and layout of infrastructure, as much as possible and practicable, to avoid and minimise impacts on the environment.*" As stated previously (above) Neoen believe the benefits strongly outweigh the costs on both a local and national level.
The above has already been given in regards to previous applications provided (first stage) for community response, but remain relevant as the issues are the same. I stand by my opinion that there should be a strategic assessment on the whole area and the accumulative effect of the turbines so that environmental groups and departments can assess and have their say without fear of losing funding and positions in this industry. It doesn't matter what stage of this project, all the same issues are present.	It is considered that this comment may apply to Stage 1A and Stage B which contain turbines, rather than the OTL and Substation West which do not contain turbines. However, Neoen provide the following in response. As stated previously (above) "*Neoen have undertaken a significant and extensive amount of technical investigations during the planning phase to identify potential impacts of the proposed action on the environment and have adjusted the design, particularly the location and layout of infrastructure, as much as possible and practicable, to avoid and minimise impacts on the environment.*" EPBC Referrals have been undertaken for all four currently proposed components of the Goyder South Hybrid Renewable Energy Facility Project: • EPBC Referral 2021/8958 Goyder South Hybrid Renewable Energy Facility - Stage 1A • EPBC Referral 2021/8957 Goyder South Hybrid Renewable Energy Facility - Stage 1B • EPBC Referral 2021/8959 Goyder South Hybrid Renewable Energy Facility - OTL and Substation • EPBC Referral 2021/8960 Goyder South Hybrid Renewable Energy Facility - Battery

	Potential cumulative impacts have been discussed in the document titled *Overview of potential cumulative impacts associated with the Goyder South Hybrid Renewable Energy Facility* (EBS Ecology 2021) which was attached to each of the EPBC Referrals. The Bird Adaptive Management Plan (BAMP) associated with Stage 1A and Stage 1B of the Project (and outlined in their respective Preliminary Documentation) will include as a minimum: • *long-term site utilisation surveys;* • *long-term turbine collision monitoring;* • *reporting requirements to DAWE; and* • *adaptative management framework.* *Long-term site utilisation surveys and long-term turbine collision monitoring is proposed to be undertaken for 24 months. Neoen propose to include the following aspects in the BAMP:* • *Introduction;* • *Pre-construction bird information;* • *Risk assessment for Goyder South Wind Farm;* • *Operational phase surveys (site utilisation and turbine collision monitoring);* • *Mitigation measures to reduce risk; and* • *Impact triggers and decision-making framework.* Furthermore, as outlined within Section 3.2.2 and subsection 3.2.2.1 (page 31-35) of the *Goyder South Hybrid Renewable Energy Facility PBTL Offset Proposal* (EBS Ecology 2022) (provided with the Stage 1A and Stage 1B Preliminary Documentation), as part of the proposed PBTL Offset, a PBTL monitoring program will be implemented *to monitor PBTL population(s) and habitat condition across Stage 1A and Stage 1B to determine if operation of wind farm infrastructure is having any impact on PBTL population(s) and/or condition of their preferred habitat."* As such, any potential accumulative impacts to birds and PBTLs associated with turbines will be identified.

NEOEN

4. Commitments and Changes to the Preliminary Documentation

The following sets out Neoen's commitments in response to the issues raised by the submission.

Commitments

Neoen is committed to minimising the impact of this project on the environment. This is evidenced by:

- The original work undertaken to develop a project that avoids sensitive areas as much as possible;
- The commitment to the protection of the Worlds End Gorge; and
- Extensive surveys, community and landowner engagement that was undertaken to develop the project layout, with significant adjustments to the design made in response.

Neoen is equally committed to avoiding impacts on EPBC MNES and, where impact is unavoidable, seeking optimal offset solutions.

In this context, it is acknowledged that there is additional detail required to finalise the recovery and off-set plans.

Neoen does not believe that any change to the Preliminary Documentation is required in response to the issues raised, but does wish to reiterate its commitment to the following:

- Ensure that the CEMP, and monitoring of infrastructure performance, manages run-off, soil, weed invasion, earthworks and erosion at all construction sites to prevent indirect impacts to host and neighbouring properties;
- Preparation of a Bird Adaptive Management Plan as a Condition of the impact assessment; and
- Provide a PBTL offset approach (including on-ground PBTL Offset Area) to achieve a measurable conservation gain for the PBTL by taking advantage of an opportunity to increase habitat quality and thus population at the sites.

NEOEN

Appendix A: Copy of Submission

From: [redacted]
Date: 17 May 2022 at 10:16:59 am ACST
To: contact@goyderenergy.com.au
Cc: EADSAandNTSection@awe.gov.au
Subject: 2021/8959 - Goyder South Overhead Transmission Line (OTL) and Substation

To whom this matter concerns,

In regards to the Goyder South Hybrid Renewable Energy Facility Wind Farm projects, I wish to express concerns in response to the preliminary documentation provided.

Do EBS ecology and Neoen understand the overall importance as an entirety, for example, Porter Lagoon, Apoinga Lagoon, Burra Creek, Hopkins Creek, Reed Creek, the Tothill Range and lagoons to the east of these areas.

My concerns expand to question whether the following recovery plans have been taken into serious consideration. There is a significant aspect of each of these plans missing from any reports provided; Recovery Plan for the Pygmy Bluetongue Lizard, Recovery Plan for Peppermint Box (Eucalyptus odorata) Grass Woodlands of South Australia, Recovery plan for the Iron-Grass Natural Temperate Grassland South Australia.

Burra Creek and the thousands of birds in wet and dry seasons, and the seasonal migration of birds and animals to the Tothill ranges from the east is an example of one crucial aspect of the area that is neglected throughout these reports.

Are Neoen aware that the hilltops running north and south are the last refuge for flora and fauna as this is the only area absent of cultivation and large-scale chemical spraying? Have they considered the private conservation efforts that have been under development and self-maintained in the area for years?

If Neoen and EBS ecology had the knowledge of these recovery plans and the areas can they explain to the EPBC how they justify to still challenge the state and federal environmental departments with a single environmental consultation. Can they explain how bull dozing, blasting and managing a windfarm will improve any part of this area more than the current work, and to justify the cost benefit ratio that seems to be obvious.

Where is the study specifically on the pygmy bluetongue lizards that describes the survival likelihood and sources of food available if the proposed project is approved

survival likelihood and sources of food available if the proposed project is approved, and a windfarm is erected in the middle of their habitat? Similarly, where is the study showing the survival likelihood and sources of food and shelter where the proposed relocation would take place? I personally suggest that pages 13-14 of the Recovery Plan for the Pygmy Bluetongue Lizard is reviewed and specifically addressed.

If Neoen purchases land to compensate for the wind farm and loss of developed habitats in that area, can they explain how the animals and birds that will be forced out of that area will survive? Are these fauna expected to sit on the fence and wait for seedlings to have hollows, nectar and nest sites and a productive understory? Most animals in the area are territorial. How does Neoen address this issue of animal behaviour disruption, alongside the basic loss of habitat?

Can I ask about the proposed Bird Adaptive Management Plan. My understanding of this plan is that turbines will be erected, and monitoring of bird collision activity will be on-going. What is the expected cost of the birds endangered during this monitoring? How many birds need to be killed/impacted before action is taken? And what is the action expected to be? This area is already known to home critically endangered and vulnerable bird species, to which this monitoring plan is a major detrimental risk.

I express my deepest concerns of the company's lack of effort of awareness of this project to the area's tourism department and community in general since the initial rejected of the idea from the community and council against a previous energy company in the same area.

I understand the appeal and necessity of a balance between the environment and renewable energy. But in this case, it is clear that the impact made on the environment is much larger that the benefit this project would provide, both immediately and long term.

The above has already been given in regards to previous applications provided (first stage) for community response, but remain relevant as the issues are the same. I stand by my opinion that there should be a strategic assessment on the whole area and the accumulative effect of the turbines so that environmental groups and departments can assess and have their say without fear of losing funding and positions in this industry.

It doesn't matter what stage of this project, all the same issues are present.

Regards,
[redacted]

Sent on behalf of J[redacted]

SUBMISSION Overhead Transmission Line (OTL) and Substation PRELIMINARY DOCUMENTATION (EPBC 2021/8959)

I am an [redacted] who has been studying the southern hairy-nosed wombat (SHNW), *Lasiorhinus latifrons,* since 2010 in the mid-north of South Australia (specifically the Goyder Region). I have concerns with the information in your proposal supplied to you by **EBS Ecology,** regarding the SHNW that is inhabiting locations within your proposed project site.

The concerns I have are listed as follows:

1. While not listed as Threatened this species is listed as Near Threatened by IUCN with suggestion that this will be reviewed as this species may warrant a more grave listing status. Habitat destruction and population fragmentation resulting in isolation is a major threat and one to which your project will potentially contribute. Fragmentation and isolation erode genetic diversity (as seen on the YP) and therefore the resilience of this species to impacts. Climate change has also been stated as a major threat with the SHNW predicted to become extinct by 2070. Therefore the populations currently in existence require the utmost consideration and conservation to increase the chance of this species survival.

Personal observation during the recent drought in South Australia saw the population on one property alone decrease by over 80% . There is a further time-lag between this decrease and an observable increase only if there are good seasons. For breeding to occur and young to survive to maturity, three good **consecutive** seasons are required. With climate change these good seasons are likely to become increasingly rare and unlikely to be consecutive.

2. It is listed that burrow ripping is an option you are considering after installation of one way gates. This 'burrow ripping' is not a proven method of control or removal and it does result in the wombat being buried alive. Wombats remain down their burrow when they perceive danger, they will not vacate their burrow, therefore their burrows can appear inactive and be misconstrued as a vacated burrow. This is supported by the fact that only 5 wombats were observed over the time of the ecological assessment, but numerous warren systems were mapped. Additionally wombats entombed during burrow ripping cannot dig themselves out.

3. In your proposal it is noted that EBS ecology observed and noted 5 SHNW, but the map below outlining wombat warren systems alludes to numerous sites. There therefore has been no attempt of a population count and if not why not? While population counts of SHNW's are not absolute counts for obvious reasons, an estimation of the number of wombats allows for monitoring this species and therefore the impact upon them. Surely your company has an ecologist employed to undertake monitoring and impact mitigation As stated above, it is **not** three good seasons for an increase in population number to occur, as stated by EBS ecology, but three **consecutive** good seasons and appropriate conditions eg: no disturbance that would limit natural behaviours. Additionally in any population there must be breeding individuals which are often limited in number (ie: a female who has bred one season will not breed again the next - until without joey) and connectivity between groups, for breeding to occur.

4."Patch 24 (3.35 ha) – Alongside a drainage line and within the vicinity of wombat burrows. This site was close to having enough species diversity and would benefit from

reduced grazing pressure" It is also listed in your document that an impact of the wombat is 'grazing competition'

If the above statement refers to 'grazing pressure' from wombats this would not be the case. Wombats are extremely low quality and quantity grazers. They have a low metabolic rate, and low energy requirements. There foraging time is limited by environmental conditions (eg: temperature and humidity) very small home range and limited energy. Further studies on wombats and sheep diets in the field show little to no overlap between forage and ingested plant matter.

5. The response from landowners in regards to the SHNW that are stated in your proposal were gathered from a questionnaire that gained a 5% response rate. Additionally responses to surveys are known to be fraught with bias due to response bias (amongst other reasons). This means that those who are motivated (hate, greed, disgust) etc are those that will respond. It does appear to be the case that many landowners do not like the SHNW because of its digging behaviour, because it doesn't 'sit well' with our view of the landscape. However, many of the claims about the wombat are exaggerated. There are many benefits that wombats provide. The wombat has not been on the Australian continent for 55-65 million years (my) and digging and possibly burrowing for 25 my by being a destructive species. However where money is involved there is unlikely to be a change of attitude in regards to a species that cannot defend itself.

6. Wombats are totally reliant on their warren systems for survival. They therefore cannot change location or move far should you

a) rip their burrow systems (if any do vacate and are not buried alive)

b) disrupt them in anyway.

They have an extremely small home range, dictated by the location of their warren system/burrow.

7. Additionally wombats prefer to dig in already dug/weakened areas, therefore if burrow ripping was to occur, others may come in and create more digging on the ripped site or on any of your construction sites. It is therefore beneficial to try to not disturb the wombat warren systems that are already insitu.

Warren systems are considered 'prime real estate' therefore those that appear abandoned may not be abandoned. Activity and use can be resumed at any time or a wombat may be hiding inside. The SHNW also prefers to maintain and/or alter warren systems already constructed, hence it is a better option to leave those that are insitu rather than result in an increase in digging and even frenzied digging which has been reported on occasion when wombats have not had access to their system. Wombats have been known to perish without access to their burrows, and also from exhaustion when digging a new system due to human interference.

8. The SHNW is an ecosystem engineer and functional species of keystone status. It creates, supports and maintains a unique and valuable ecosystem. One that is threatened by human activities and by climate change. The functions it provides are important to other species including humankind and our agricultural activities. Being aware of this is vital to maintain the landscape and the species on your construction sites. The SHNW provides for many species.

9. Listed in your report (8.3.2 Wombats) is how wombats are viewed by landowners. Most landowners and people in general, are not aware of the services provided. Despite the perception that wombats are destructive, and management being based on perception, there has been no study into the repercussions from the wombat's activities until now. Digging species worldwide have been proven functional species, but Australia is still following its old methods of management rather than questioning methods that have led to a shameful extinction rate.

No individual nor organisation can know all the answers regarding species. The information in your proposal regarding the SHNW appears to have been sourced from only a few articles rather than experts in the field. I am therefore hoping that EBS Ecology contracted 'experts' in regards to all species that are occurring on your construction site. It is highly remiss that no population count, health status, determination of the status of the warren systems for the SHNW was included in your report. Apart from numerous scientists that would assist you, there is also a wombat rescue group that assists in management of the SHNW. If you do require further assistance please get in contact with me.

Thank you for the opportunity to respond to your proposal.

Kind regards,

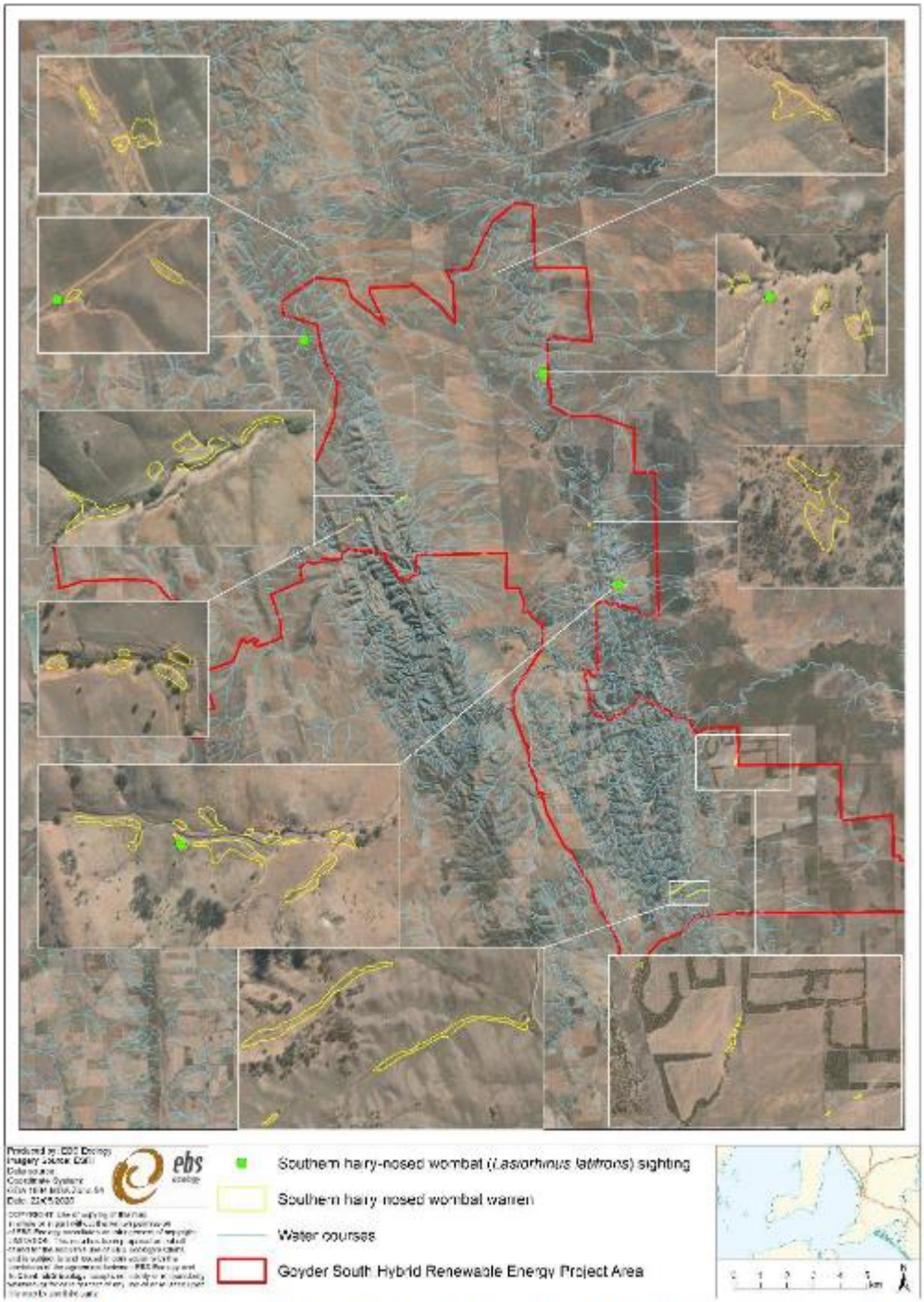

Figure 38. SHNW records (green dots) and warrens (yellow polygons) within the Project Area. Two SHNWs were recorded at the green dot in the southeast of the Project Area. Major drainage lines are shown (blue lines).