Spicers Creek Wind Farm

Biodiversity Management Plan
SSD-41134610

SQUADRON ENERGY

19 February 2026

Final

Revision Control

Revision	Date	Issue	Author	Reviewed	Approved	Signature
000A	26/05/2025	Final Draft (for agency consultation)	Bill Wallach (Umwelt)	Kirsty Davies (Umwelt)	Alana Gordijn (Squadron Energy)	
000B	10/09/2025	Final Draft (for CPHR approval and NPWS consultation)	Bill Wallach (Umwelt)	Kirsty Davies (Umwelt)	Zeina Jokadar (Squadron Energy)	
001	21/10/2025	Final for DPHI approval	Bill Wallach (Umwelt)	Kirsty Davies (Umwelt)	Zeina Jokadar (Squadron Energy)	
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Confidentiality

Disclaimer

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Abbreviations

Term	Definition
AHD	Australian Height Datum
AS	Australian Standard
BBAMP	Bird and Bat Adaptive Management Plan
BC Act	NSW Biodiversity Conservation Act 2016
BCS	NSW Biodiversity, Conservation and Science Group within NSW DCCEEW (now referred to as Conservation Programs, Heritage and Regulation NSW).
BDAR	Biodiversity Development Assessment Report
BMP	Biodiversity Management Plan
BOM	Bureau of Meteorology
BOS	Biodiversity Offset Scheme
CEEC	Critically endangered ecological community, as defined under the BC Act or EPBC Act
CPESC	Certified Professional in Erosion and Sediment Control
CPHR	Conservation Programs, Heritage and Regulation NSW (formerly BCS)
DCCEEW	The Australian Government Department of Climate Change, Energy, the Environment and Water
DPE	Department of Planning and Environment (now referred to as Department of Planning, Housing and Infrastructure)
DPHI	NSW Department of Planning, Housing and Infrastructure
EC	Ecological Community Listed under the EPBC Act
EEC	Endangered ecological community, as defined under the BC Act or EPBC Act
EIS	The Environment Impact Statement for Spicers Creek Wind Farm dated July 2023
EMS	Environmental Management Strategy
EP&A Act	NSW Environmental Planning and Assessment Act 1979
EPBC Act	Commonwealth Environment Protection and Biodiversity Conservation Act 1999
EPC	Engineering Procurement and Construction contractor
EP	Emergency Plan
ESCP	Erosion and Sediment Control Plan
GIS	Geographical Information System
ha	Hectares (unit)
km	Kilometers (unit)
LGA	Local Government Area
MW	Megawatts
NPW Act	National Parks and Wildlife Act 1974
NPWS	National Parks and Wildlife Services
PCT	Plant Community Type

Term	Definition
RF Act	NSW Rural Fires Act 1997
RFS	NSW Rural Fire Service
SCWF	Spicers Creek Wind Farn Pty Ltd
SEARs	Secretary's Environmental Assessment Requirements
SSD	State Significant Development
TEC	Threatened Ecological Community
VDP	Vegetation Disturbance Permit
WHS	Work Health and Safety
WIRES	Wildlife Information, Rescue and Education Service
WTG	Wind Turbine Generator

Key Terms

Term	Definition
Ancillary infrastructure	All project infrastructure with the exception of wind turbines, including but not limited to collector substations, switching stations, permanent offices, electricity transmission lines, site compounds, communication cables (including control cables and earthing), wind monitoring masts and internal roads.
Applicant	Spicers Creek Wind Farm Pty Ltd, or any person carrying out the development approved under this consent
Battery storage	Compound and technology for storing and discharging energy. Comprised of buildings, shipping containers and other infrastructure to contain the chosen technology and to connect the battery storage infrastructure with the WTGs, and substations via underground and/or overhead cables.
Clearing	As defined in Part 5A of the Local Land Services Act 2013:
Commissioning	The testing of the components, equipment and systems of the development following completion of construction, prior to operations commencing.
Construction	The construction of the Project, including but not limited to, the carrying out of any earthworks on site and the construction of any ancillary infrastructure (but excludes road upgrades or maintenance works to the public road network, building/road dilapidation surveys, installation of fencing, artefact survey and/or salvage, overhead line safety marking and geotechnical drilling and/or surveying.
Development Consent	SSD-41134610
Development Corridor	The area generally bound by a buffer of 100 m radius around the Development Footprint. For the absence of doubt, the over-sail of WTGs may extend beyond this Development Corridor but will be within the Project Site.
Approved Development Footprint	The maximum potential extent of ground disturbance (including earthworks associated with permanent infrastructure and temporary facilities (other than temporary field laydown areas)) in the Project Site that has been approved for the Project

Term	Definition
Final Development Footprint	The extent of ground disturbance (including earthworks associated with permanent infrastructure and temporary facilities (other than temporary field laydown areas)) in the Project Site that results from construction of the Project following approval of the Final Detailed Design.
Ground Disturbance	Activities that cut into the existing ground surface. For the absence of doubt this does not include activities that occur on the ground surface including but not limited to driving vehicles on the ground, parking vehicles, placing infrastructure or materials such as stockpiles on the ground.
Heavy Vehicle	As defined under the *Heavy Vehicle National Law* (NSW), but excluding light and medium rigid trucks and buses no more than 8 tonnes and with not more than 2 axles.
Light Vehicle	Car or rigid truck to 8T GVM or bus to 12 seats.
Meteorological Masts	Temporary and Permanent masts up to hub height of the WTGs and of a guyed, narrow lattice or tubular steel design and concrete footings of approximately 1 m^2 for each of the mast and guy wires. Guy wires may extend beyond 100 m from the base of the mast. The final number and location of the masts will be determined post-Development Consent, post-WTG selection and detailed design. The masts and the guy wires that secure them may need to be located outside of the Development Corridor, however they will remain within the Project Site.
Micro-siting	The process of locating WTGs, battery storage, ancillary infrastructure and temporary infrastructure during detailed design without further approval providing: • The ground disturbance remains within the Development Corridor (with the exception of wind monitoring masts) • No WTG is moved more than 100 metres from the relevant GPS coordinates. • The revised location of the blade of a WTG is at least 50 metres from the canopy of existing hollow-bearing trees; or where the proposed location of the blade of a WTG is already within 50 metres of the canopy of existing hollow-bearing trees, the revised location is not any closer to the existing hollow-bearing trees • The meteorological masts are located within the Project Site
Operation	The operation of the Project, but does not include commissioning, trials of equipment or use of temporary facilities.
Pre-construction Minor Works	Includes the following activities: • Surveys; • Overhead line safety marking; • Building/road dilapidation surveys; • Investigative drilling, excavation or salvage; • Minor clearing or translocation of native vegetation; • Establishment of temporary site office (in locations meeting the criteria defined in the Development Consent); • Installation of environmental impact mitigation measures, fencing, enabling works; • Wind monitoring masts; and • Construction of minor access roads and minor adjustments to services/utilities, etc.
Project	The Spicers Creek Wind Farm
Project Site	The land within the cadastral boundaries associated with the proposed Project, as defined in Appendix 1 and 2 of the Development Consent.
Proponent	Spicers Creek Wind Farm Pty Ltd (SCWF)
Substations	Infrastructure required to collect the internal electrical reticulation to increase the voltage for transmission to connect to the grid, and the infrastructure to physically connect to the grid (i.e. switching station). Typically includes step-up transformers, an array of cable marshalling, busbars, switchgear and protection, various voltage and current transformers, operation and facilities building with parking, communication

Term	Definition
	facilities and tower, diesel generator, lighting, a buried earth grid, lightning masts, power conditioning equipment, a reactive power control system, and network support equipment as required and agreed with REZ Network Operator (or other transmission network system operator).
The Minister	Minister for the Environment and Water (Commonwealth)
The Secretary	Planning Secretary under the EP&A Act, or nominee.

1 Introduction

1.1 Background

Spicers Creek Wind Farm Pty Ltd (SCWF) has obtained Development Consent for the construction, operation, maintenance, and decommissioning of the Spicers Creek Wind Farm (the Project). The Project is located approximately 25 km north west of Gulgong and 35 km north east of Wellington (**Figure 1.1**) in the Central-West Orana Renewable Energy Zone of New South Wales (NSW), within the Dubbo Regional and Warrumbungle Shire Local Government Areas (LGA).

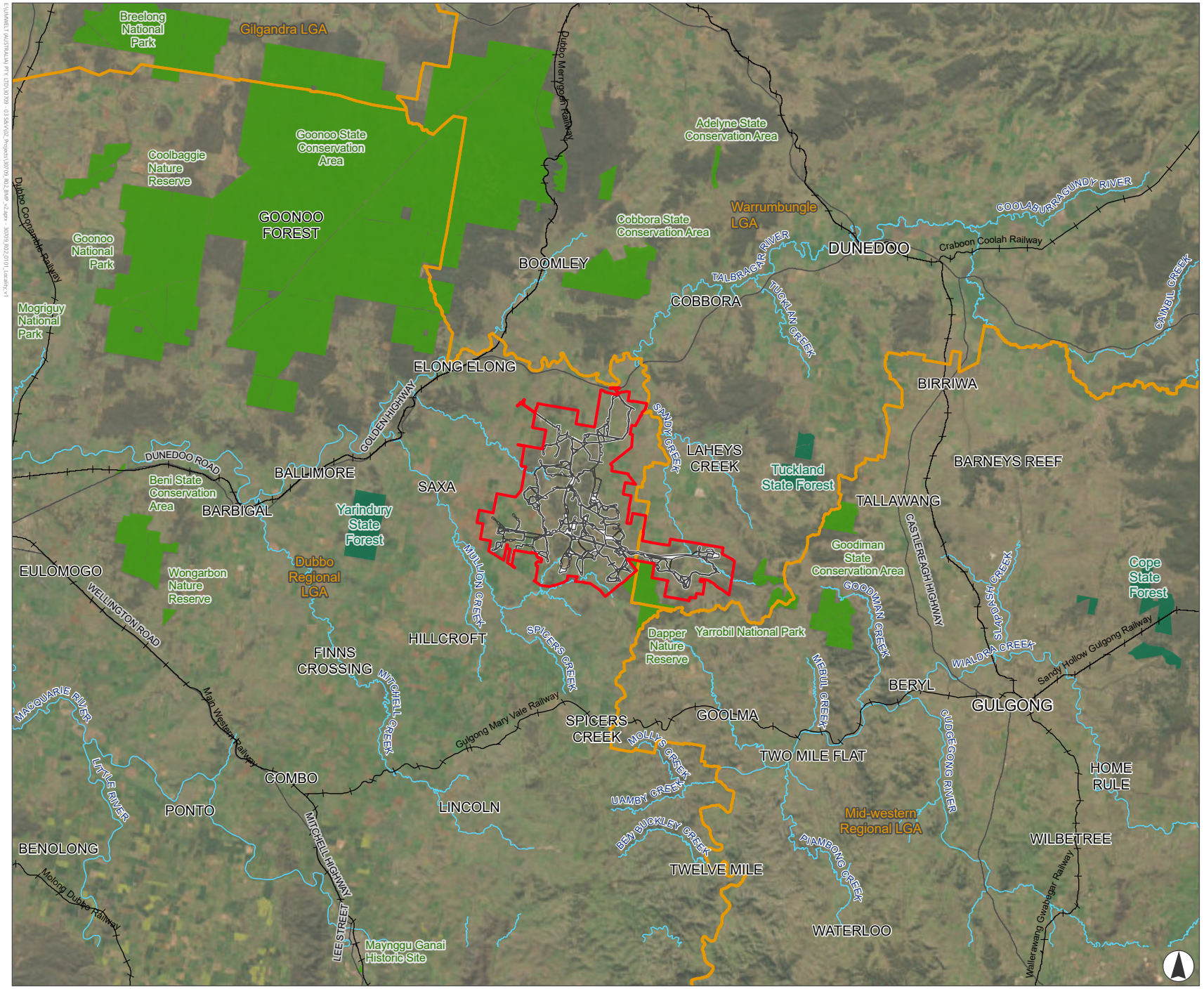
The Project will have a capacity of approximately 700 megawatts (MW), with the potential to power approximately 397,000 homes. The Project comprises up to 117 wind turbine generators (WTGs), battery storage and associated infrastructure including, access roads, hardstands, laydown areas, internal electrical reticulation, temporary construction compounds, rock crushing facilities, concrete batching plant(s), substations, an operations and maintenance facility, overhead transmission line and switching stations. The Approved Development Footprint comprises a total area of approximately 1,471 ha.

The approved Project layout is shown on **Figure 1.2**. This layout will be further refined throughout detailed design and a Final Layout Plan will be prepared and submitted to the NSW Department of Planning, Housing and Infrastructure (DPHI) in accordance with Development Consent Condition C8.

A full description of the Project is provided in the Submissions Report which can be accessed on the SCWF website at https://www.squadronenergy.com/our-projects/spicers-creek-wind-farm.

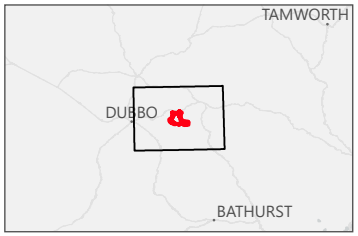
FIGURE 1.1

Project Locality



Legend

- Project Site
- Development Footprint
- Development Corridor
- NPWS Reserve
- State Forest
- Local Government Area
- Waterway
- Road
- Railway



0 5 10

Kilometres

Scale 1:450,000 at A4
GDA2020 MGA Zone 55

Image Source: ESRI Basemap (2023) | **Data Source:** NSW DFSI (2023)

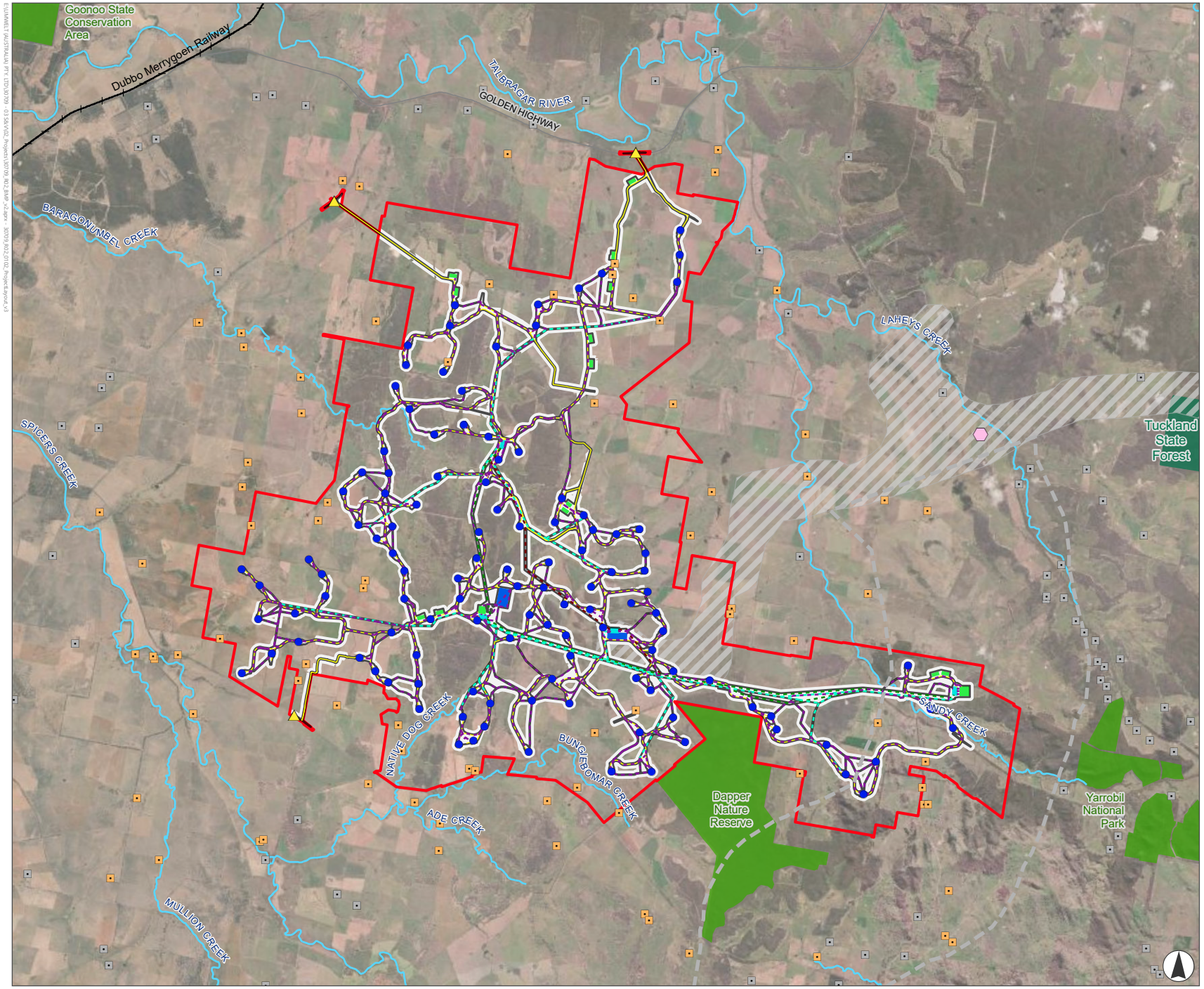
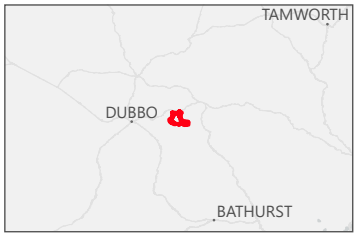


FIGURE 1.2

Spicers Creek Wind Farm Project

Legend

- Project Site
- Development Corridor
- Development Footprint
- EnergyCo Indicative REZ Transmission Corridor
- EnergyCo Potential Southern Extension
- Site Compound
- Electrical Plant Compound
- Substation
- Associated - House
- Non Associated - House
- Wind Turbine Generator
- Site Access Point
- EnergyCo Elong Elong Energy Hub
- Overhead Powerline (HV or MV)
- Overhead Powerline (HV)
- Overhead Powerline (MV)
- Underground Powerline
- Access Track
- NPWS Reserve
- State Forest
- Waterway
- Road
- Railway
- Locality



0 2 4

Kilometres

Scale 1:140,000 at A4
GDA2020 MGA Zone 55

Image Source: ESRI Basemap (2023) | **Data Source:** NSW DFSI (2023)

1.2 Purpose and Scope of this BMP

This Biodiversity Management Plan (BMP) has been prepared to meet the relevant conditions of Development Consent Condition B26, EPBC Approval Condition 6 and other relevant requirements. Following approval by the NSW Planning Secretary, SCWF will implement the BMP.

This BMP has been prepared by suitably qualified and experienced biodiversity expert Bill Wallach; National Biodiversity Renewables Lead / Principal Ecologist of Umwelt (Australia) Pty Ltd (Umwelt).

Once approved, in accordance with the Development Consent Condition C15, this BMP will be published and made publicly available on the SCWF website: https://www.squadronenergy.com/our-projects/spicers-creek-wind-farm.

1.3 Aims and Commitments

The aim of the BMP is to avoid, minimise or mitigate Project impacts to biodiversity values. The approval holder commits to the implementing the relevant conditions of the development consent as outlined in **Table 2.1** and the conditions of the EPBC Act Approval as outlined in **Table 2.2.** Project-specific management measures are described for implementation throughout design, pre-construction, construction, operation and maintenance.

1.4 Staging

In accordance with Development Consent Condition C3, any strategy, plan or program required under the Development Consent may be prepared and submitted on a staged basis, with the approval of the NSW Planning Secretary.

Pursuant to Condition C3 of the Development Consent, SCWF obtained approval from the NSW Planning Secretary to stage Project management plans as outlined in **Table 1.1** below.

This version of the BMP applies to Stage 1. Triggers for review and revisions required to support the transition of this BMP between stages are outlined in **Table 1.1.**

Table 1.1: Project Staging Approach

Stage	Description of Stage	Triggers for BMP Preparation and Revision
Stage 1a	Pre-construction minor works activities associated with the wind farm and associated infrastructure.	BMP to be prepared prior to carrying out any development that could impact biodiversity values. *BMP to cover Stages 1a – 1d*
Stage 1b	Commence construction of the wind farm (excluding high-risk heavy vehicles requiring an escort).	
Stage 1c	Continue construction of the wind farm (including high-risk heavy vehicles requiring an escort).	
Stage 1d	Commence operation of the wind farm	
Stage 2a	Commence construction of the Battery Energy Storage System (BESS)	Revise BMP to incorporate relevant details and measures associated with the BESS construction and operation. *Revised BMP to cover Stages 1d – 2b.*
Stage 2b	Commence operation of the BESS	
Stage 3	Decommissioning of the wind farm (and battery storage system, if constructed) at end of life	Revise the BMP to incorporate all necessary details and measures associated with Decommissioning. *Revised BMP to cover Stage 3 only.*

1.5 Project Environmental Management Strategy

Development Consent Condition C1 requires the preparation of an Environmental Management Strategy (EMS) for the Project. The EMS provides the Project's strategic framework for environmental management under which the BMP operates.

This BMP has been written to complement other management plans for the Project, including the Bird and Bat Adaptive Management Plan (BBAMP) and has been developed as a component of, and is to be read in conjunction with, the Project's EMS.

2 Statutory Context

2.1 NSW Development Consent

The Project has been determined as a State Significant Development (SSD), and as such, it must comply with the relevant guidelines for SSDs under the NSW *Environmental Planning and Assessment Act 1979* (EP&A Act). **Table 2.1** lists the relevant conditions of SSD 41134610 pertaining to biodiversity and provides a reference to the relevant sections of the BMP where the conditions have been addressed.

Table 2.1: BMP-Specific Development Consent Conditions

Condition of Approval	Requirements – The approval holder makes a commitment to implement these conditions	Section Addressed
Condition B22	**Vegetation Clearance** The Applicant must not clear any native vegetation or fauna habitat located outside the development corridor.	**Section 6.1**
Condition B23	**Restriction of Clearing and Habitat** Unless the Planning Secretary agrees otherwise, the Applicant must: (a) ensure that the vegetation and habitat clearing limits specified in Table 1 and 2 of Appendix 5 are not exceeded; and	**Section 5.1** **Section 6.1**
	(b) minimise: (i) the clearing of native vegetation and key habitat;	**Section 6.1**
	(ii) the impacts of the development on hollow-bearing trees; and	**Section 6.1.3**
	(iii) the impacts of the development on threatened bird and bat populations.	**Section 6.3.1**
Condition B24	**Biodiversity Offsets** Prior to carrying out any development that could directly or indirectly impact the biodiversity values requiring offset, the Applicant must retire biodiversity credits of a number and class specified in Table 1 and Table 2 of Appendix 5, unless the Planning Secretary agrees otherwise. The retirement of these credits must be carried out in accordance with the *NSW Biodiversity Offsets Scheme* and can be achieved by: (a) acquiring or retiring 'biodiversity credits' within the meaning of the *Biodiversity Conservation Act 2016*; (b) making payments into an offset fund that has been developed by the NSW Government; or (c) funding a biodiversity conservation action that benefits the entity impacted and is listed in the ancillary rules of the biodiversity offset scheme.	**Section 6.10**
Condition B25	Prior to carrying out any development that could directly or indirectly impact the biodiversity values requiring offset, the Applicant must provide evidence to the Planning Secretary that biodiversity credits have been retired.	**Section 6.10**
Condition B26	Prior to carrying out any development that could impact biodiversity values, unless the Planning Secretary agrees otherwise, the applicant must prepare a Biodiversity Management Plan for the development, and to the satisfaction of the Planning Secretary. This plan must:	This plan
	(a) be prepared by a suitably qualified and experienced biodiversity expert/s in consultation with BCS, NPWS and AG DCCEEW;	**Section 1.2**
	(b) be prepared in accordance with the amended Biodiversity Development Assessment Report (BDAR) dated December 2023 and the amended BDAR Addendum dated 17 May 2024;	**Section 2.2**

Condition of Approval	Requirements – The approval holder makes a commitment to implement these conditions	Section Addressed
	(c) include a description of the measures and timeframes that would be implemented to: (i) ensure the development does not adversely affect the native vegetation and habitat outside the disturbance footprint and ensure the restrictions on clearing in conditions B23 are met;	**Section 6.1** **Section 6.1.4** **Section 6.3** **Section 8.5**
	(ii) minimise the clearing of native vegetation and habitat within the disturbance footprint;	**Section 6.1** **Section 6.1.4** **Section 6.3** **Section 8.5**
	(iii) minimise impacts on entities at risk of a Serious And Irreversible Impact (SAII), including ensuring that an additional 53.8 ha of Box Gum Woodland CEEC is securely conserved within a Biodiversity Stewardship Agreement within 3 years (over and above the relevant credit obligations) comprised of: • 31.3 ha of intact woodland; • 9.9 ha of disturbed and modified woodlands; and • 12.6 ha of derived native grasslands;	**Section 5** **Section 6** **Section 6.10**
	(iv) minimise the impacts of the development on threatened flora and fauna species within the disturbance footprint and its surrounds, including the: • pink-tailed legless lizard • glossy black cockatoo • barking owl	**Section 4.6.2** **Section 5.1** **Section 6.3** **Section 6.10** Pink-tailed legless lizard was not recorded during surveys (September–November 2024), ruling out its presence in the Approved Development Corridor
	(v) rehabilitating and revegetating temporary disturbance areas;	**Section 6.1.6** **Section 6.9**
	(vi) protecting native vegetation and key fauna habitat outside the approved disturbance area;	**Section 6.1.4** **Section 6.2**
	(vii) maximising the salvage of resources within the approved disturbance area – including vegetative and soil resources – for beneficial reuse (such as fauna habitat enhancement) during the rehabilitation and revegetation of the site;	**Section 6.1.6** **Section 6.9**
	(viii) have regard to the *NSW Saving Our Species - Hygiene Guidelines Protocols to protect priority biodiversity areas in NSW from Phytophthohra cinnamomi, myrtle rust, amphibian chytrid fungus and invasive plants* (DPIE 2020);	**Section 2.5** **Section 6.5**
	(ix) collecting and propagating seed (where relevant);	**Section 6.1.6**
	(x) controlling weeds and feral pests;	**Section 6.5**
	(xi) controlling erosion; and	**Section 6.7.1**
	(xii) bushfire management;	**Section 6.6**

Condition of Approval	Requirements – The approval holder makes a commitment to implement these conditions	Section Addressed
	(d) include a detailed program to monitor and report on the effectiveness of these measures; and;	**Section 8**
	(e) include details of who would be responsible for monitoring, reviewing and implementing the plan.	**Section 7.1**
	Following the Planning Secretary's approval, the Applicant must implement the Biodiversity Management Plan.	**Section 8**

2.2 Biodiversity Development Assessment Report

A Biodiversity Development Assessment Report (BDAR) (Umwelt, 2023a) was prepared by Umwelt in June 2023 as part of the Environmental Impact Statement (EIS) documentation for the Project to address the Secretary's Environmental Assessment Requirements (SEARs). The BDAR (Umwelt, 2023a) provided an assessment of the biodiversity values of the Project Site, documented the application of the avoid, minimise and offset framework and assessed the likely biodiversity impacts of the Project.

To address Project refinements and consider agency feedback, an Amended BDAR (Umwelt, 2023b) was subsequently prepared in December 2023 as part of the Submissions phase of the Project. An Addendum to the Amended BDAR (Umwelt, 2024), was then prepared in May 2024 to capture changes to the biodiversity assessment requested by the then NSW Biodiversity, Conservation and Science Group (BCS) as well as summarise the results and methodology of two additional targeted fauna species-credit species (being the Pale-headed snake and Key's matchstick grasshopper) that were committed to in the Amended BDAR (Umwelt, 2023b).

In accordance with Condition B26(b), this BMP has been prepared in accordance with the Amended BDAR dated December 2023 and the Amended BDAR Addendum dated 17 May 2024.

2.3 EPBC Act Approval

The Project is a controlled action under the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) and was assessed under the bilateral agreement between the NSW and Commonwealth Governments. Relevant conditions of the EPBC Approval 2022/09387 (EPBC Approval) are provided in **Table 2.2**.

Table 2.2: Relevant EPBC Approval Conditions

Condition of Approval	Requirements – The approval holder makes a commitment to implement these conditions	Section Addressed
Clearing and Construction Limits		
Condition 2	The approval holder must not: (a) clear outside of the development corridor. (b) construct outside of the development corridor.	**Section 6.1** **Section 6.2**
Condition 3	The approval holder must not clear more than: (a) 53.8 hectares (ha) of Box Gum Grassy Woodlands and Derived Native Grasslands (b) 31.2 ha of Grey Box Grassy Woodlands and Derived Native Grasslands (c) 98.1 ha of Regent Honeyeater habitat (d) 40.7 ha of Superb Parrot habitat (e) 15.1 ha of South-eastern Glossy Black-cockatoo habitat (f) 130.2 ha of White-throated Needletail habitat	**Section 5.1**
South-Eastern Glossy Black Cockatoo Pre-Clearance Surveys		

Condition of Approval	Requirements – The approval holder makes a commitment to implement these conditions	Section Addressed
Condition 4	To reduce the risk of South-eastern Glossy Black-Cockatoo injury or death from clearing, during the South-eastern Glossy Black-cockatoo breeding season (March to August), no more than 72 hours prior to commencing clearing of any area of South-eastern Glossy Black-cockatoo habitat, a suitably qualified ecologist must undertake targeted surveys within that area to identify the presence and location of any South-eastern Glossy Black-cockatoo nesting activity.	**Section 6.1.5**
South-Eastern Glossy Black Cockatoo Clearance Surveys		
Condition 5	If South-eastern Glossy Black-cockatoo nesting activity is identified, clearing must not occur: (a) within 100 m of the nesting activity, and (b) until a suitably qualified ecologist has confirmed that: (i) all young South-eastern Glossy Black-cockatoo at the location of the nesting activity have vacated the nest, and/or (ii) nesting activity has ceased.	**Section 6.1.5**
Biodiversity Management Plan		
Condition 6	The approval holder must comply with condition B26 of the NSW Approval.	This plan Refer to **Table 2.1**
Condition 7	To avoid and mitigate for impacts to protected matters, the approval holder must not commence the Action unless the Biodiversity Management Plan required under condition B26 of the NSW Approval has been approved in accordance with condition B26 of the NSW Approval. The approval holder must commence implementing the Biodiversity Management Plan required under condition B26 of the NSW Approval, to the extent that it relates to protected matters, no later than the commencement of the Action, and continue to implement it, or the approved revision, at least until the completion of the Action.	**Section 1.2** **Section 7.1**
Condition 8	If the Minister is not satisfied that the Biodiversity Management Plan is sufficient to protect protected matters, the Minister may direct the approval holder to include specific measures in the Biodiversity Management Plan. If the Minister directs the approval holder to include specific measures, the approval holder must update the Biodiversity Management Plan with the required measures within 20 business days of receiving the direction from the Minister.	**Section 10.1**
Condition 9	The approval holder must notify the department at the same time as submitting any request to have a revised version of the Biodiversity Management Plan approved by the NSW Planning Secretary if those revisions are relevant to protected matters. If a revised version of the Biodiversity Management Plan is approved by the NSW Planning Secretary, the approval holder must provide the department with the approved revised Biodiversity Management Plan within 5 business days of its approval and specify what changes have been made from the previous approved version, and any implications of the changes for protected matters.	**Section 10.3**

2.4 Additional Permits and Requirements

Ecologists undertaking work for the Project should hold appropriate licences, including (but not limited to) the following:

- SL100198 Scientific License, in accordance with Part 2 of the *Biodiversity Conservation Act 2016*.
- Animal Research Authority – Animal Ethics Approval, in accordance with the *NSW Animal Research Act 1985*.
- BioNet sensitive species data licence.

2.5 Legislation, Guidelines and Standards

Other relevant legislation, guidelines and standards include:

- Central West Regional Strategic Pest Animal Management Plan (Local Land Services, 2018).
- Central West Regional Strategic Weed Management Plan (Local Land Services, 2022).
- NSW Biodiversity Conservation Act 2016 (BC Act).
- New South Wales Weed Control Handbook (DPI 2018).
- Saving our species - Hygiene guidelines – Protocols to protect priority biodiversity areas in NSW from *Phytophthora cinnamomi*, myrtle rust, amphibian chytrid fungus and invasive plants (NSW DPIE 2020) Hygiene guidelines (nsw.gov.au).
- Tree Protection Zone Australian Standard (AS 4970-2009).

3 Stakeholder Consultation

3.1 Agency Consultation

Preparation of this BMP has occurred in consultation with the NSW Conservation Programs, Heritage and Regulation Group (CPHR) (formerly referred to as BCS), National Parks and Wildlife Services (NPWS), and Australian Government Department of Climate Change, Energy, the Environmental and Water (AG DCCEEW) as required by Development Consent Condition B26 and EPBC Approval Condition 6. A summary of DPHI, CPHR, NPWS and AG DCCEEW consultation completed to date, and where this feedback has been addressed in this BMP, is documented in **Table 3.1**.

Records of agency consultation are included in **Appendix A**.

Table 3.1: Agency Consultation during the Development of this BMP

Agency	Consultation Date	Nature/Outcome of Consultation	Section Addressed
CPHR	7 May 2025	A pre-lodgement meeting was held with CPHR (Candice Larkin and David Geering) to provide an overview of the BMP prior to submission.	N/A
CPHR	30 July 2025	CPHR completed a review of the draft BMP, providing comments/recommendations including:	-
		Revise the BMP to include targets and triggers that are quantitative, unambiguous and relate to performance or completion criteria for all management activities.	**Table 8.1**
		Ensure all performance criteria, completion criteria and indicators: • meet the 'SMART' principles. • are drafted with consideration of current baseline conditions. • are supported by suitable monitoring methods.	**Table 8.1**
		Include a description of the management measures that would be implemented for each of the specific matters listed in approval condition B26 within the BMP. The BMP should be a stand-alone document which can be read without additional documents.	**Section 6.3.1**
		Include the pre-clearance survey procedure in the BMP, ensuring any additional mitigation measures proposed for glossy black-cockatoo and barking owl are incorporated.	**Section 6.1.5**
		Where active nests are identified, postpone removal of habitat trees until birds have fledged.	**Section 6.1.5**
		Exposed trenches should be checked for trapped fauna at least twice a day (morning and afternoon/evening) at a minimum.	**Table 8.1**
		Ensure any operational impacts for the glossy black-cockatoo and barking owl which have not been addressed in the BMP are addressed within the BBAMP.	Refer to Project Bird and Bat Management Plan (separate to this BMP).
AG DCCEEW	1 September 2025	AG DCCEEW completed a review of the draft BMP and advised that they had no further comments.	N/A
CPHR	14 October 2025	Reinstate the 200m buffer on any hollow-bearing tree that is confirmed or strongly believed to be actively used by barking owl for clearing during the breeding season.	No change.

Agency	Consultation Date	Nature/Outcome of Consultation	Section Addressed
		Report all records of breeding threatened species found during pre-clearance surveys to CPHR.	Section **6.1.5**
		No nest of a threatened species should be removed without prior consultation with CPHR	Section **6.1.5**
		The removal of the tree, and surrounding habitat, should be postponed until birds have fledged and can move out of the cleared area	No change
		Ensure any operational impacts for the glossy black-cockatoo and barking owl which have not been addressed in the BMP are addressed within the BBAMP CPHR previously acknowledged that the management actions and mitigation methods for a number of operational impacts, such as turbine collisions, are better placed in the Bird and Bat Adaptive Management Plan (BBAMP). We welcome the opportunity to review the BBAMP	Noted. The draft BBAMP will be provided to CPHR when it is ready for submission.
NPWS	16 October 2025	Section 6.1.1 Detailed design – as part of the detailed design process, additional clear actions to minimise impacts and risk of disturbance to Dapper Nature Reserve, by a. establishing the 200m buffer from the surveyed boundary of the nature reserve in accordance with Condition A8(e) of the Approval, excluding the final micrositing of all Wind Turbine Generators (WTGs) to the full buffer extent. b. ensuring ancillary facilities are established outside the 200m buffer from the surveyed boundary of the nature reserve, in line with the WTG buffer condition. c. considering the construction of new access tracks or upgrades to existing tracks proximate to, or on the interface with, the nature reserve in accordance with Condition B35 of the Approval and in considering impacts in accordance with Developments adjacent to National Parks and Wildlife Service lands (DPIE, 2020) via https://www.environment.nsw.gov.au/publications/developments-adjacent-national-parks-andwildlife- service-lands	**Section 6.1.1**
		Section 6.1.4 Demarcation of Clearance Boundaries, subject to Condition B22 of the Approval, ensure the boundaries of the final development corridor and wind farm assets (WTG, auxiliary facility and internal access tracks) are to be digitally captured and displayed in the development's GIS database. Where proximate to the NPWS estate boundary, identify the nature reserve boundary relative to the development corridor and assets.	**Section 6.1.4**
		Section 6.1.6 Salvage of Habitat Features and Vegetative Materials – salvage and collection as an action in response to the clearing of native vegetation and site preparation for the WTG, ancillary facilities and internal access tracks. Where the material may benefit biodiversity and habitat restoration outcomes, it will be utilised or moved to areas adjacent to the development corridor. Salvage may include habitat features such as tree hollows, scattered or fallen debris and boulders, with the collection of vegetative material (fruits and seeds) for use in propagation for site revegetation activities. Where the NPWS estate is considered for placement of salvaged materials or in the collection of plant material to facilitate rehabilitation activities, further environmental assessment and authorisation from the NPWS will be required.	**Section 6.1.6**
		Section 6.3 - Minimising Impacts on Native Fauna - where native fauna is deemed displaced or at risk of harm with relocation and release proposed, if the release is to occur on the nature reserve, the act must be authorised by NPWS and may require licencing	**Section 6.3**

Agency	Consultation Date	Nature/Outcome of Consultation	Section Addressed
		under the Biodiversity Conservation Act 2016. Ensure this is addressed as part of the BMP.	
		Section 6.5.1 - Weeds and Pathogens – where active management remains a priority, particularly in proximity to Dapper Nature Reserve. The BMP should include as part of: a. pathogen actions, with the identified priority considerations around Phytophthora (Phytophthora cinnamomi), Myrtle rust (Austropuccinia psidii), and Chytrid fungus (Batrachochytrium dendrobatidis), baseline data is obtained, documented with set performance standards. This will support the annual quantitative survey as proposed for detecting the presence and extent of pathogens on the interface of the nature reserve. Provide methodology and targeted collection requirements, which will be completed by a qualified and experienced ecologist. b. weed actions, as part of the development site biosecurity requirements under the Central West Regional Strategic Weed Management Plan 2023-2027 (Local Land Services, 2022). Provide or reference the baseline dataset and survey methodology to be applied to the proposed annual quantitative survey for the presence and extent of high-threat weeds, which will be completed by a qualified and experienced ecologist. c. management activities occurring proximate to, or on the interface of the nature reserve, can be coordinated with NPWS to ensure effective management of high-threat weeds and pathogen risks. Contact with the NPWS Mudgee Area is recommended.	No change
		Section 6.5.2 Vertebrate Pests – provide for the monitoring programs set for vertebrate pest threats within the development corridor, ensure consistency with the targeted priorities set out in the Central West Regional Strategic Pest Animal Management Plan 2024-2028 (Local Land Services, 2024), with management programs notified where proximate to, or where issues are detected on the interface of the nature reserve.	**Table 8.1** Reference updated **Section 6.5.2**
		Section 6.8 Noise, Dust and Light - minimise lighting requirements and associated light spill impacts on the nature reserve, use the National Light Pollution Guidelines for Wildlife (DCCEEW, 2023) - https://www.dcceew.gov.au/environment/biodiversity/publications/national-light-pollution-guidelineswildlife to assist in lighting design.	No change
		Section 9.1.1 Incident Notification and Reporting (Development consent) – in the notification of incidents affecting the nature reserve, should include NPWS Mudgee Area 6370 9000 or npws.mudgee@environment.nsw.gov.au and for emergency notifications, the NPWS Blue Mountains Branch Duty Officer 8275 17478 or npwsbmb.dutyofficer@environment.nsw.gov.au.	**Section 9.1.3** added
		Access to the nature reserve for any purpose during construction or operation is subject to authorisation issued by NPWS as the park authority. If you have any questions, please contact me on 02 6370 9006 or at Lisa.Menke@dcceew.nsw.gov.au.	Noted
NPWS	12/02/2026	On review of the Table and the proposed amendments to the set actions in the Biodiversity Management Plan, NPWS agrees matters highlighted have been sufficiently addressed. These amendments both address and manage the highlighted and potential risks arising from the construction and operation of the project	Noted all above changes have been agreed.
CPHR	18/02/2026	Report all records of breeding threatened species found during pre-clearance surveys to CPHR. Table 3.1 of the revised BMP indicates that section 6.1.5 resolves CPHR's request to 'report all records of breeding threatened	Section **6.1.5** has been updated

Agency	Consultation Date	Nature/Outcome of Consultation	Section Addressed
		species found during pre-clearance surveys to CPHR'. CPHR has been unable to locate this assurance in the revised BMP. Recommendation: Include a commitment to report all records of breeding threatened species found during pre-clearance surveys to CPHR.	
		No nest of a threatened species should be removed without prior consultation with CPHR. Table 3.1 of the revised BMP also indicates that issue 4.2 (relating to the removal of a nest of a threatened species without consultation with CPHR), has been resolved by comments added to section 6.1.5 'nesting birds'. The BMP clearly states that active nests of threatened birds must not be removed until the birds have fledged. The BMP should also ensure that trees within 100 m of active nests are not cleared; to minimise the possibility of the nest being abandoned. It is further stated that should any unhatched eggs be present in a nest of threatened species that has apparently been abandoned by the parents, as determined by a suitably qualified ecologist, the habitat tree may be removed.	Section **6.1.5** 'Nesting Birds' has been updated
CPHR	19/02/2026	CPHR is satisfied that the BMP addresses all of the concerns outlined in our advice of 18 February 2026 (DOC26/85684).	Noted all above changes have been agreed.

4 Existing Environment

4.1 Land Use

The majority of the Project Site and the surrounding land is zoned RU1 - Primary Production. The Project Site is predominately used for livestock grazing, with some areas of dryland cropping present. Surrounding land use includes livestock grazing, residential dwellings associated with agricultural properties and the Dapper Nature Reserve, zoned as C1- National Parks and Nature Reserves.

There are 24 private landholdings within the Project Site along with some small areas of Crown Land, Crown Land reserves and Dubbo Regional Council-owned roads. These include several dwellings (termed associated dwellings) for which SCWF has a negotiated agreement in place with the landowner regarding Project impacts.

4.2 Climate

Comparable climate data for the site has been taken from the Bureau of Meteorology (BOM) (BOM, 2024) weather station 'Gulgong Post Office' (Site no. 062013), approximately 70 km south-east of the Project Site and at an elevation of 475 m Australian Height Datum (AHD). Mean monthly rainfall and temperature data for the period 1881 to 2023 and 1970 to 2023 has been presented in **Figure 4.1**. Mean monthly rainfall is reasonably consistent throughout the year, ranging from 44 mm in April to 70 mm in January on average.

Several of the management measures described in **Section 6** are influenced by the weather, which will be considered in detailed planning, construction and rehabilitation phases.

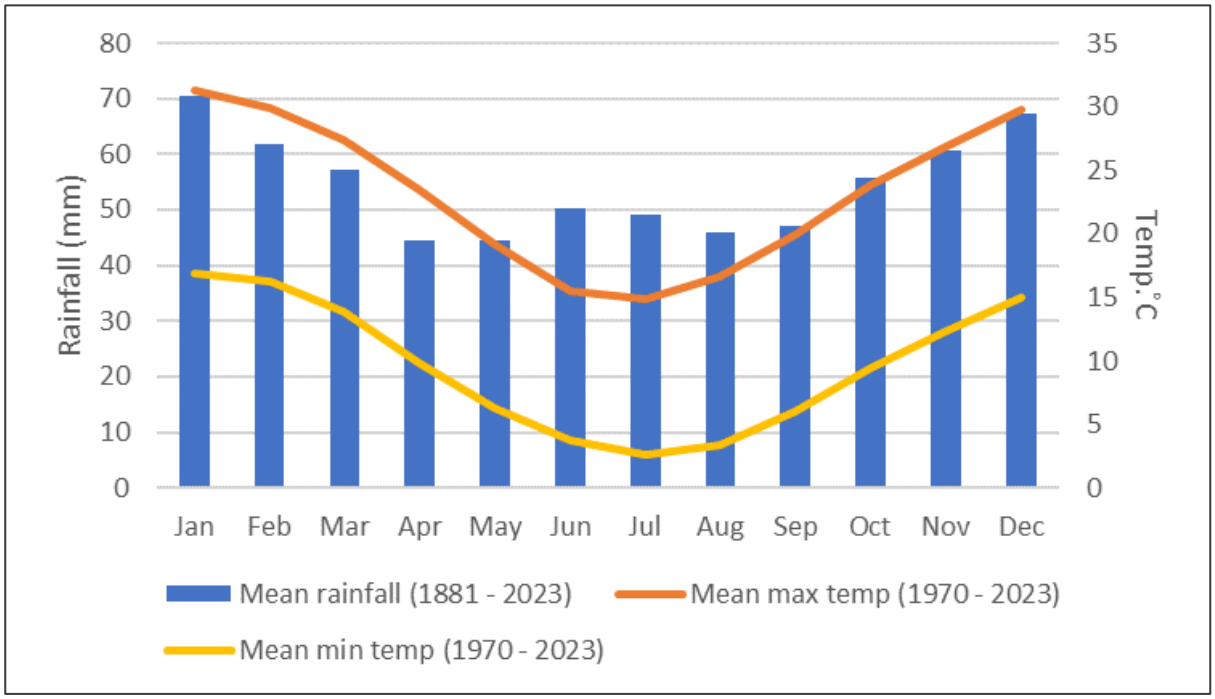


Figure 4.1: Mean Annual Weather Data (BOM Site No. 062013)

4.3 Hydrology

The topography of the Project Site primarily features undulating terrain with ridgelines separating the intervening valleys. The Project Site has an elevation ranging from 360 m AHD to 540 m AHD. It is located within the Macquarie-Bogan River system and extends across the catchments of several tributary channels of the Talbragar River. Waterways within the Project Site are shown on **Figure 1.2**. These have been classified as non-sensitive and are not considered to be key watercourses for fish passage.

4.4 Landscape and Soils

Modelled soil properties and modelled soil erosion (sourced from eSPADE) for the Project Site indicate that:

- Topsoils are predicted to be coarse to fine grained, generally non-sodic and non-dispersive with generally low susceptibility to erosion and low fertility;
- Subsoils are predicted to be finer grained than topsoils, slightly sodic in upper slopes and possibly dispersive with low fertility; and
- Soils in the Project Site are highly erosive in areas of steep topography in the upper slopes and areas within the bed and bank of streams and within 40 m of the top of bank defined streams (i.e. waterfront land).

A soil survey, including field sampling and in-situ soils classification, was conducted in August 2022 by D&N Geotechnical, as part of the Project EIS, to confirm soil characteristics across the Project Site. The analysis confirmed that the soils within the Project Site are typically slightly to negligibly dispersive, and slightly or non-sodic.

Erosion of soils and sedimentation of receiving creeks may lead to associated impacts to vegetation and aquatic fauna. Although erosion is generally considered to be low risk, management measures will ensure that related impacts are avoided, particularly for upper slopes and areas within 40 m of defined streams.

4.5 Flora and Vegetation Communities

Areas of native vegetation on the Project Site are present generally in the form of paddock trees, with areas of intact vegetation located on upper slopes, along local roads and drainage lines. The Project Site features varying degrees of biodiversity value and mixed intact and modified woodlands/forests and grasslands, with much of the site historically cleared for agricultural land uses and consisting of pasture and native grasslands derived from clearing of treed vegetation (derived native grasslands).

4.5.1 Plant Community Types

Approximately 75% of the Development Corridor has been mapped as Category 1 – Exempt Land (i.e. cleared land or water), comprising agricultural land, exotic vegetation or disturbed land.

Of the remaining vegetation, surveys identified several plant community types (PCTs) occurring within the Development Corridor, with conditions ranging from good to derived native grasslands.

The extent of PCTs (including those conforming with Critically Endangered Ecological Communities (CEECs) or Endangered Ecological Communities (EECs)) within the Development Corridor are presented in **Table 4.1** and **Figure 4.2**. Detailed descriptions of each PCT are provided in the Addendum to Amended BDAR (Umwelt, 2023c). This information may be used to inform rehabilitation requirements (**Section 6.9**).

Table 4.1: Plant Community Types Identified Within the Development Corridor and Footprint

PCT	Zone ID	Condition Class	BC Act	EPBC Act	Development Corridor Area (ha)	Development Footprint Area (ha)
81 - Western Grey Box - cypress pine shrub grass shrub tall woodland in the Brigalow Belt South Bioregion	1	Moderate to Good	EEC	EEC	2.8	1.0
	2	Derived Native Grasslands	EEC	EEC	3.5	1.7
266 - White Box grassy woodland in the upper slopes sub-region of the NSW South Western Slopes Bioregion	3	Moderate to Good	CEEC	CEEC	50.8	10.5
	4	Thinned Canopy	CEEC	CEEC	18.0	8.0
	5	Planted	CEEC	CEEC	6.5	2.0
	6	Derived Native Grasslands	CEEC	CEEC	16.2	6.7
267 - White Box - White Cypress Pine - Western Grey Box shrub/grass/forb woodland in the NSW South Western Slopes Bioregion	7	Moderate to Good	EEC	EEC	35.8	8.3
	8	Thinned Canopy	EEC	EEC	17.7	6.5
	9	Derived Native Grasslands	N/A	N/A	41.1	14.1
272 - White Box - Black Cypress Pine - red gum +/- Mugga Ironbark shrubby woodland in hills of the NSW central western slopes	10	Moderate to Good	N/A	N/A	206.1	30.4
	11	Shrubby	N/A	N/A	18.7	5.0
	12	Thinned Canopy	N/A	N/A	9.4	2.0
	13	Derived Native Grasslands	N/A	N/A	167.4	52.6
281 - Rough-Barked Apple - red gum - Yellow Box woodland on alluvial clay to loam soils on valley flats in the northern NSW South Western Slopes	14	Moderate to Good	CEEC	CEEC	87.8	22.3
	15	Derived Native Grasslands	CEEC	CEEC	20.0	6.0

PCT	Zone ID	Condition Class	BC Act	EPBC Act	Development Corridor Area (ha)	Development Footprint Area (ha)
Bioregion and Brigalow Belt South Bioregion						
467 - Blue-leaved Ironbark - Black Cypress Pine shrubby sandstone open forest in the southern Brigalow Belt South Bioregion (including Goonoo)	16	Moderate to Good	N/A	N/A	304.1	53.7
	17	Shrubby	N/A	N/A	51.5	15.9
	18	Thinned Canopy	N/A	N/A	17.8	5.0
	19	Derived Native Grasslands	N/A	N/A	66.9	19.6
468 - Narrow-leaved Ironbark - Black Cypress Pine +/- Blakely's Red Gum shrubby open forest on sandstone low hills in the southern Brigalow Belt South Bioregion (including Goonoo)	20	Moderate to Good	N/A	N/A	18.2	1.9
	21	Derived Native Grasslands	N/A	N/A	5.1	2.1
Total PCT					**1,187.4**	**275.3**
Non-PCT (non-native pasture, cleared, etc.)					**3,642.6**	**1,186.3**
Sum Total					**4,830.0**	**1,461.6**
% PCT of Total					**25%**	**18%**

4.5.2 Threatened Ecological Communities

Analyses documented in the Addendum to Amended BDAR (Umwelt, 2024) compared surveyed PCTs with potential BC Act and EPBC Act listed TECs and found that five surveyed PCTs conform with either CEECs or EECs.

Conforming PCTs are indicated in **Table 4.1** and **Figure 4.2**. Relevant TEC descriptions for each are provided in **Table 4.2**.

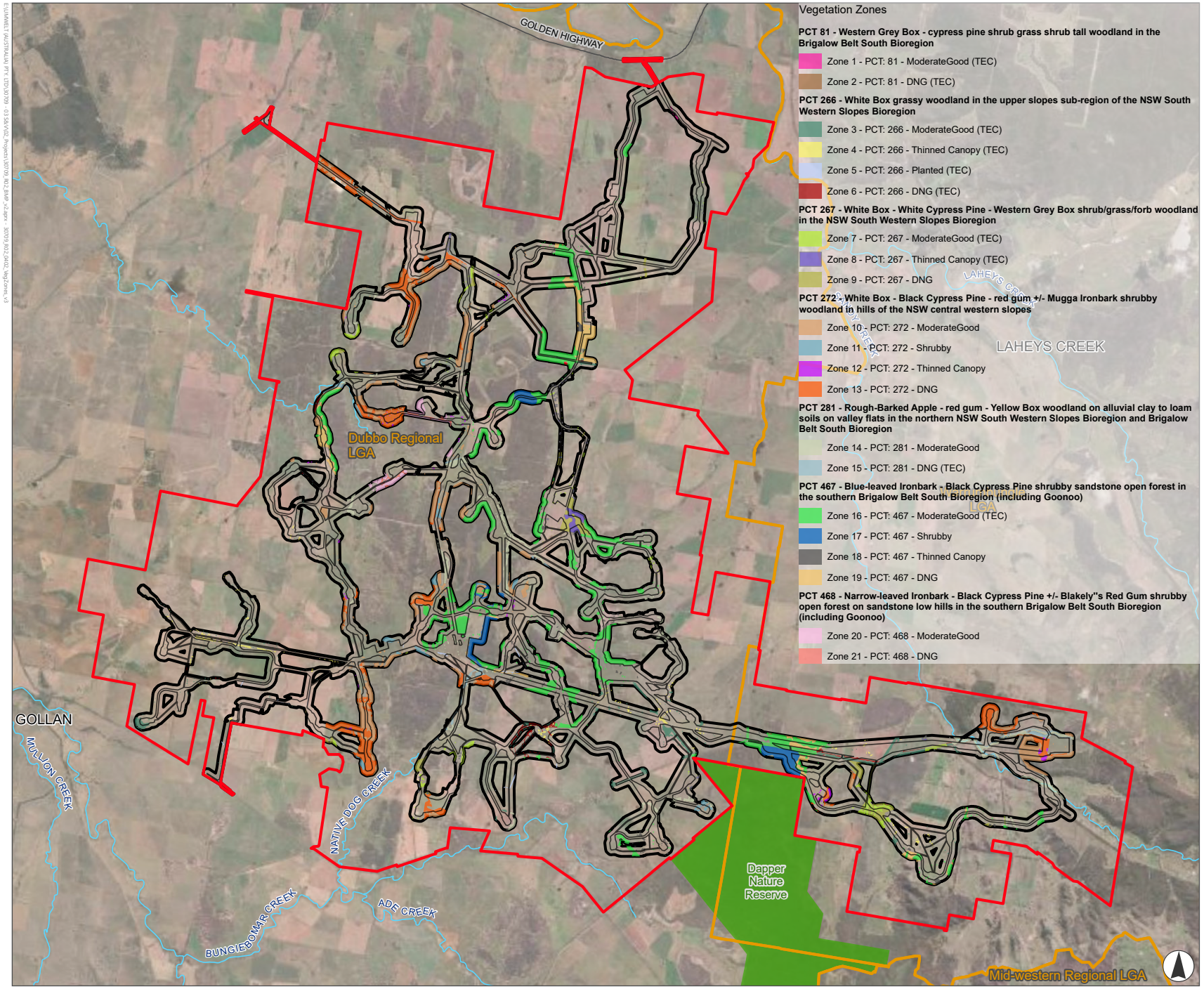
Table 4.2: TEC Details for Conforming PCTs

PCT name	Zone ID	Condition Class	TEC (BC Act)	TEC (EPBC Act)
81 - Western Grey Box - cypress pine shrub grass shrub tall woodland in the Brigalow Belt South Bioregion	1	Moderate to Good	Inland Grey Box Woodland in the Riverina, NSW South Western Slopes, Cobar Peneplain, Nandewar and Brigalow Belt South Bioregions	Grey Box (*Eucalyptus microcarpa*) Grassy Woodlands and Derived Native Grasslands of South-eastern Australia
	2	Derived Native Grasslands		
266 - White Box grassy woodland in the upper slopes sub-region of the NSW South Western Slopes Bioregion	3	Moderate to Good	White Box - Yellow Box - Blakely's Red Gum Grassy Woodland and Derived Native Grassland in the NSW North Coast, New England Tableland, Nandewar, Brigalow Belt South, Sydney Basin, South Eastern Highlands, NSW South Western Slopes, South East Corner and Riverina Bioregions	White Box-Yellow Box-Blakely's Red Gum Grassy Woodland and Derived Native Grassland
	4	Thinned Canopy		
	5	Planted		
	6	Derived Native Grasslands		

267 - White Box - White Cypress Pine - Western Grey Box shrub/grass/forb woodland in the NSW South Western Slopes Bioregion	7 8	Moderate to Good Thinned Canopy	Inland Grey Box Woodland in the Riverina, NSW South Western Slopes, Cobar Peneplain, Nandewar and Brigalow Belt South Bioregions	Grey Box (*Eucalyptus microcarpa*) Grassy Woodlands and Derived Native Grasslands of South-eastern Australia
281 - Rough-Barked Apple - red gum - Yellow Box woodland on alluvial clay to loam soils on valley flats in the northern NSW South Western Slopes Bioregion and Brigalow Belt South Bioregion	14 15	Moderate to Good Derived Native Grasslands	White Box - Yellow Box - Blakely's Red Gum Grassy Woodland and Derived Native Grassland in the NSW North Coast, New England Tableland, Nandewar, Brigalow Belt South, Sydney Basin, South Eastern Highlands, NSW South Western Slopes, South East Corner and Riverina Bioregions	White Box-Yellow Box-Blakely's Red Gum Grassy Woodland and Derived Native Grassland

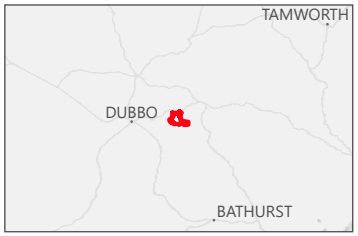
FIGURE 4.2

Plant Community Types and Vegetation Zones



Legend

- Project Site
- Development Footprint
- Development Corridor
- Cleared
- NPWS Reserve
- Local Government Area
- Waterway
- Road



0 2.5 5

Kilometres

Scale 1:110,000 at A4
GDA2020 MGA Zone 55

Image Source: ESRI Basemap (2023) | **Data Source:** NSW DFSI (2023)

4.5.3 Threatened Flora

Potential habitat has been identified within the Approved Development Footprint for several threatened flora species. These are listed in **Table 4.3**.

No threatened flora species were found within the Approved Development Corridor or Approved Development Footprint during targeted threatened species surveys conducted as part of the Amended BDAR (Umwelt, 2023b). One threatened flora species, pine donkey orchid (*Diuris tricolor*) (as shown in **Figure 4.3**), was recorded in the Project Site, but beyond the Approved Development Corridor, during targeted surveys undertaken for the Project.

It remains possible that the species listed below may be identified during pre-clearance surveys or other activities.

Table 4.3: Threatened Flora Species with Potential Habitat within the Approved Development Footprint

Common Name	Scientific Name	BC Act	EPBC Act
Ausfeld's wattle	*Acacia ausfeldii*	V	-
Blue Grass	*Dichanthium setosum*	V	V
Pine Donkey Orchid	*Diuris tricolor*	V	-
Euphrasia arguta	*Euphrasia arguta*	CE	CE
Tumut grevillea	*Grevillea wilkinsonii*	CE	E
Fairy Bells	*Homoranthus darwinioides*	V	V
Leafless Indigo	*Indigofera efoliata*	E	E
Scant Pomaderris	*Pomaderris queenslandica*	E	-
***Prasophyllum* sp. Wybong**	*Prasophyllum sp. Wybong*	-	CE
Small purple pea	*Swainsona recta*	E	E
Silky Swainson pea	*Swainsona sericea*	V	-
Tylophora linearis	*Tylophora linearis*	V	E
Keith's zieria	*Zieria ingramii*	E	E

Figure 4.3: Pine Donkey Orchid (*Diuris tricolor*) Specimen

4.5.4 High Threat Weeds

High threat weeds are defined by DPHI as those that, if not controlled, will invade and outcompete native plant species. Those recorded at the Project Site are listed in **Table 4.4**. Where listed as regional priority weeds in the Central West Regional Strategic Weed Management Plan (Local Land Services, 2022), this is indicated along with the relevant objectives, which may include:

- Asset protection (to prevent spread into areas of high economic, environmental or social value);
- Containment (to prevent ongoing spread); or
- Eradication (to reduce extent with aim of local eradication).

Table 4.4: High Threat Weeds Recorded Within the Project Site

Common Name	Scientific Name	Status
Sheep Sorrel	*Acetosella vulgaris*	N/A

Common Name	Scientific Name	Status
Khaki Weed	*Alternanthera pungens*	N/A
Moth Vine	*Araujia sericifera*	N/A
Cobbler's Pegs	*Bidens pilosa*	N/A
Greater Beggar's Ticks	*Bidens subalternans*	N/A
Great Brome	*Bromus diandrus*	N/A
Saffron Thistle	*Carthamus lanatus*	N/A
Rhodes Grass	*Chloris gayana*	N/A
Umbrella Sedge	*Cyperus eragrostis*	N/A
Panic Veldtgrass	*Ehrharta erecta*	N/A
African Lovegrass	*Eragrostis curvula*	N/A
Blue Heliotrope	*Heliotropium amplexicaule*	Regional Priority Weed (Objective: Containment)
St. Johns Wort	*Hypericum perforatum*	Regional Priority Weed (Objective: Asset Protection)
Creeping Pear	*Opuntia humifusa*	N/A
Paspalum	*Paspalum dilatatum*	N/A
Onion Grass	*Romulea rosea var. australis*	N/A
Fireweed	*Senecio madagascariensis*	Regional Priority Weed (Objective: Eradication)
Wandering Jew	*Tradescantia fluminensis*	N/A
Noogoora Burr	*Xanthium occidentale*	N/A
Bathurst Burr	*Xanthium spinosum*	Regional Priority Weed (Objective: Asset Protection)

4.6 Fauna

4.6.1 Fauna Habitat

The Project Site comprises a disturbed agricultural landscape. Habitat corridors occur across the broader landscape which provide linkage of habitat in the north to Cobbora State Conservation Area, Goonoo State Conservation Area and Goonoo National Park, in the east to Goodiman State Conservation Area and Yarrobil National Park in the south to Dapper Nature Reserve.

Potential habitat for a diversity of common, threatened and migratory native fauna has been recorded at the Project Site.

4.6.2 Threatened Fauna and Migratory Species

Potential habitat has been identified within the Approved Development Footprint for several threatened fauna species. These are listed in **Table 4.5** which also includes an indication of whether they were detected during targeted threatened species surveys conducted as part of the Amended BDAR (Umwelt, 2023b).

Table 4.5: Threatened and Migratory Fauna Species that have been Detected or may Potentially Occur on the Project Site

Group	Common Name	Scientific Name	BC Act	EPBC Act	Previously detected within the Project Site
Birds	Regent Honeyeater	*Anthochaera phrygia*	CE	CE	No
	Dusky Woodswallow	*Artamus cyanopterus cyanopterus*	V	-	Yes
	Bush Stone-curlew	*Burhinus grallarius*	E	-	No
	Gang-gang Cockatoo	*Callocephalon fimbriatum*	E	E	No
	Glossy Black-cockatoo	*Calyptorhynchus lathami*	V	V	Yes
	Speckled Warbler	*Chthonicola sagittata*	V	-	Yes
	Spotted Harrier	*Circus assimilis*	V	-	Yes
	Brown Treecreeper (eastern subspecies)	*Climacteris picumnus victoriae*	V	V	Yes
	Varied Sittella	*Daphoenositta chrysoptera*	V	-	No
	Black Falcon	*Falco subniger*	V	-	Yes
	Purple-crowned Lorikeet	*Parvipsitta porphyrochephala*	V	-	No
	Little Lorikeet	*Parvipsitta pusilla*	V	-	Yes
	Painted Honeyeater	*Grantiella picta*	V	V	No
	White-bellied Sea-Eagle	*Haliaeetus leucogaster*	V	-	No
	Little Eagle	*Hieraaetus morphnoides*	V	-	Yes
	Swift Parrot	*Lathamus discolor*	E	CE	No
	Malleefowl	*Leipoa ocellata*	E	V	No
	Pink Cockatoo	*Lophochroa leadbeateri*	V	-	No
	Square-tailed Kite	*Lophoictinia isura*	V	-	Yes
	Hooded Robin (south-eastern form)	*Melanodryas cucullata cucullata*	E	E	No
	Black-chinned Honeyeater	*Melithreptus gularis gularis*	V	-	No
	Turquoise Parrot	*Neophema pulchella*	V	-	Yes
	Barking Owl	*Ninox connivens*	V	-	Yes
	Powerful Owl	*Ninox strenua*	V	-	No
	Gilbert's Whistler	*Pachycephala inornata*	V	-	No
	Scarlet Robin	*Petroica boodang*	V	-	No
	Flame Robin	*Petroica phoenicea*	V	-	No
	Superb Parrot	*Polytelis swainsonii*	V	V	Yes

Group	Common Name	Scientific Name	BC Act	EPBC Act	Previously detected within the Project Site
	Grey-crowned Babbler (eastern subspecies)	*Pomatostomus temporalis temporalis*	V	-	Yes
	Diamond Firetail	*Stagonopleura guttata*	V	V	Yes
	Masked Owl	*Tyto novaehollandiae*	V	V	No
	Fork-tailed swift	*Apus pacificus*	-	-	No
	Latham's snipe	*Gallinago hardwickii*	V	V	No
	White-throated Needletail	*Hirundapus caudacutus*	V	V	Yes
	Rufous fantail	*Rhipidura rufifrons*	-	-	No
Birds (migratory)	Fork-tailed swift	*Apus pacificus*	-	-	No
	Latham's snipe	*Gallinago hardwickii*	-	-	No
	White-throated needletail	*Hirundapus caudacutus*	V	V	Yes
	Rufous fantail	*Rhipidura rufifrons*	-	-	No
Bats	Large-eared pied bat	*Chalinolobus dwyeri*	E	E	Yes
	Little pied bat	*Chalinolobus picatus*	V	-	No
	Eastern false pipistrelle	*Falsistrellus tasmaniensis*	V	-	No
	Large bent-winged bat	*Miniopterus orianae oceanensis*	V	-	Yes
	Corben's long-eared bat	*Nyctophilus corbeni*	V	V	No
	Grey-headed flying fox	*Pteropus poliocephalus*	V	V	No
	Yellow-bellied sheathtail-bat	*Saccolaimus flaviventris*	V	-	No
Mammals (non-flying)	Eastern pygmy-possum	*Cercartetus nanus*	V	-	No
	Spotted-tailed quoll	*Dasyurus maculatus*	V	E	No
	Squirrel glider	*Petaurus norfolcensis*	V	-	No
	Koala	*Phascolarctos cinereus*	E	E	No
	New Holland mouse	*Pseudomys novaehollandiae*	-	V	No
Reptiles	Pink-tailed legless-lizard	*Aprasia parapulchella*	V	V	No
	Pale-headed snake	*Hoplocephalus bitorquatus*	V	-	No
	Rosenberg's goanna	*Varanus rosenbergi*	V	V	No
Frogs	Sloane's froglet	*Crinia sloanei*	E	E	No
Invertebrates	Key's matchstick grasshopper	*Keyacris scurra*	E	E	No

It is noted that the presence of pink-tailed legless-lizard within the Approved Development Corridor was ruled out following the completion of surveys between September and November 2024 during which the species was not recorded. The species previously had an assumed presence within the Development Corridor.

5 Project Activities and Biodiversity Impacts

5.1 Approved Clearing Limits

The key impacts of the Project on biodiversity values are associated with the required clearing of native vegetation within the Approved Development Footprint. The clearing limits for native vegetation PCTs (including those conforming with CEECs or EECs) within the Approved Development Footprint are presented in **Table 5.1** (as per Table 1 of Appendix 5 of the Development Consent). This includes up to 172.8 ha of woody vegetation that may be subject to clearing.

Table 5.1: Native Vegetation Clearing Limits

PCT	Zone ID	Condition Class	BC Act	EPBC Act	Approved Development Footprint (Indicative Impact) Area (ha)
81 - Western Grey Box - cypress pine shrub grass shrub tall woodland in the Brigalow Belt South Bioregion	1	Moderate to Good	EEC	EEC	1.0
	2	Derived Native Grasslands	EEC	EEC	1.7
266 - White Box grassy woodland in the upper slopes sub-region of the NSW South Western Slopes Bioregion	3	Moderate to Good	CEEC	CEEC	10.5
	4	Thinned Canopy	CEEC	CEEC	8.0
	5	Planted	CEEC	CEEC	2.0
	6	Derived Native Grasslands	CEEC	CEEC	6.7
267 - White Box - White Cypress Pine - Western Grey Box shrub/grass/forb woodland in the NSW South Western Slopes Bioregion	7	Moderate to Good	EEC	EEC	8.3
	8	Thinned Canopy	EEC	EEC	6.5
	9	Derived Native Grasslands	N/A	N/A	14.1
272 - White Box - Black Cypress Pine - red gum +/- Mugga Ironbark shrubby woodland in hills of the NSW central western slopes	10	Moderate to Good	N/A	N/A	30.4
	11	Shrubby	N/A	N/A	5.0
	12	Thinned Canopy	N/A	N/A	2.0
	13	Derived Native Grasslands	N/A	N/A	52.6
281 - Rough-Barked Apple - red gum - Yellow Box woodland on alluvial clay to loam soils on valley flats in the northern NSW South Western Slopes Bioregion and Brigalow Belt South Bioregion	14	Moderate to Good	CEEC	CEEC	22.3
	15	Derived Native Grasslands	CEEC	CEEC	6.0
467 - Blue-leaved Ironbark - Black Cypress Pine shrubby sandstone open forest in the southern Brigalow Belt South Bioregion (including Goonoo)	16	Moderate to Good	N/A	N/A	53.7
	17	Shrubby	N/A	N/A	15.9
	18	Thinned Canopy	N/A	N/A	5.0
	19	Derived Native Grasslands	N/A	N/A	19.6
468 - Narrow-leaved Ironbark - Black Cypress Pine +/- Blakely's Red Gum shrubby open forest on sandstone low hills in the southern	20	Moderate to Good	N/A	N/A	1.9
	21	Derived Native Grasslands	N/A	N/A	2.1

PCT	Zone ID	Condition Class	BC Act	EPBC Act	Approved Development Footprint (Indicative Impact) Area (ha)
Brigalow Belt South Bioregion (including Goonoo)					
Total extent (woody vegetation)					172.5
Total extent (derived native grasslands)					102.8
Total					275.3

Of the threatened fauna species listed in **Table 4.5**, species polygons have been generated for relevant species under the BC Act. These species polygons represent potentially suitable threatened fauna species habitat and are used to determine required species credits for offsetting. The clearing limits for threatened fauna species habitat are presented in **Table 5.2** (as per Table 2 of Appendix 5 of the development consent). The location of the species polygons are shown in **Figure 5.1** and **Figure 5.2**.

Table 5.2: Identified Threatened Fauna Habitat Clearing Limits (Table 2, Appendix 5, Development Consent SSD-41134610)

Common Name	Scientific Name	Habitat Type	Approved Development Footprint (Indicative Impact) Area (ha)
Glossy Black-cockatoo	*Calyptorhynchus lathami*	Potential breeding habitat	15.1
Barking Owl	*Ninox connivens*	Potential breeding habitat	22.03

It is noted that correspondence from DPHI dated 6 March 2025 has approved the removal of credit requirements for the pink-tailed legless lizard, following the completion of surveys between September and November 2024 during which the species was not recorded. The pink-tailed legless lizard previously had an assumed presence within the Development Corridor, generating 139 species credits. Should the species be recorded within the Project Site, the unexpected finds protocol outlined in **Section 6.4** will be triggered.

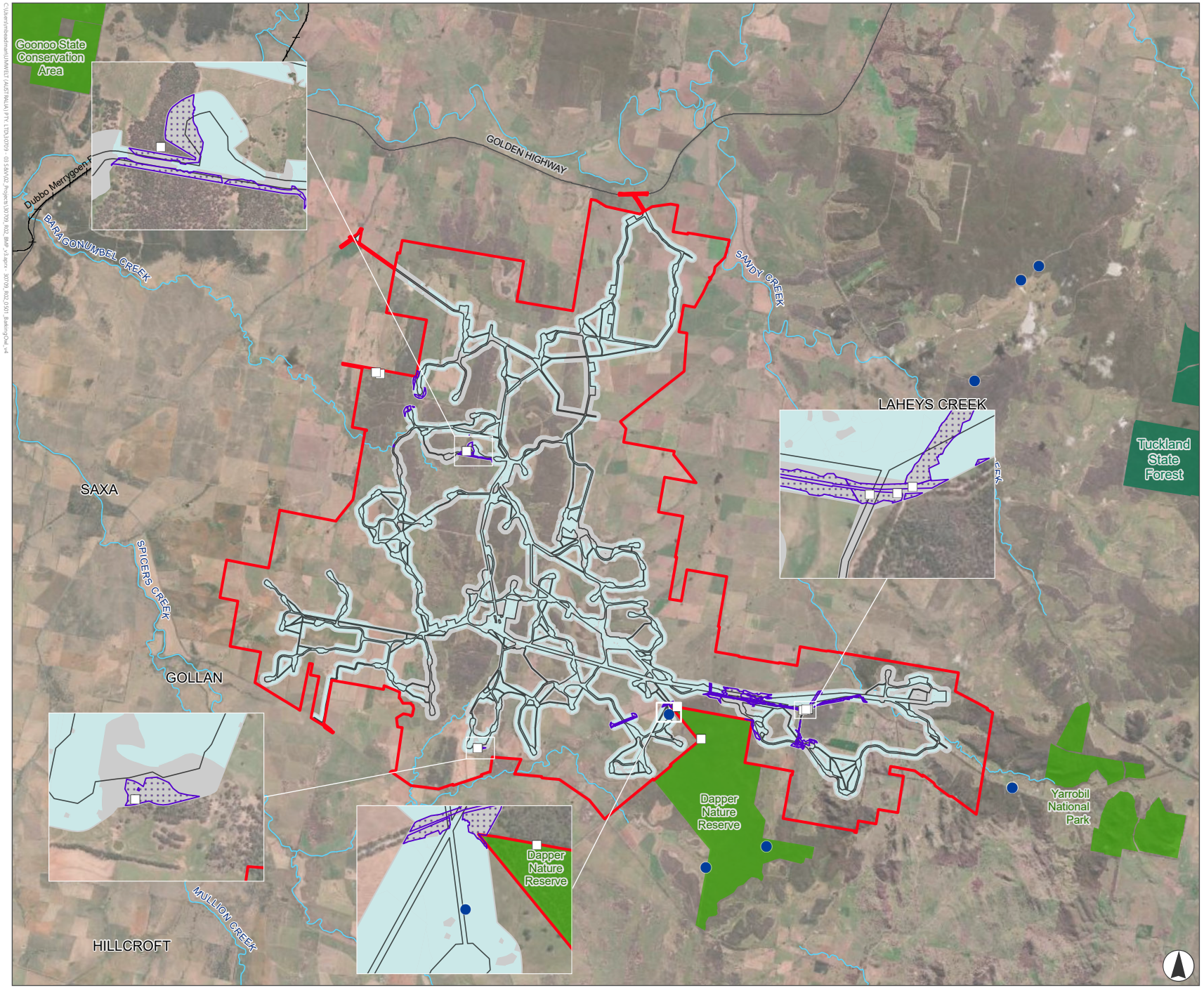
Condition 3 of the EPBC Approval also stipulates the following clearing limits included within **Table 5.3**.

Table 5.3: EPBC Approval Clearing Limits

Name	Approved Clearing Limit (ha)
Box Gum Grassy Woodlands and Derived Native Grasslands	53.8
Grey Box Grassy Woodlands and Derived Native Grasslands	31.2
Regent Honey Eater habitat	98.1
Superb Parrot habitat	40.7
South-eastern Glossy Black-cockatoo habitat	15.1
White-throated Needletail habitat	130.2

FIGURE 5.1

Identified Barking Owl Species Polygons within the Approved Development Corridor



Legend

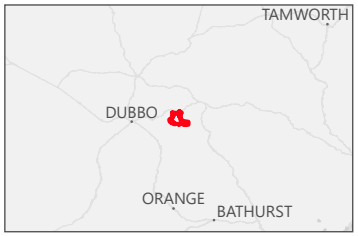
- Project Site
- Development Corridor
- Development Footprint
- Category 1 - Exempt Land
- State Forest
- NPWS Reserve
- Road
- Railway
- Waterway
- Barking Owl Species Polygon

Umwelt TS records

- Barking Owl

NSW BioNet Atlas TS records

- Barking Owl



0 2.5 5

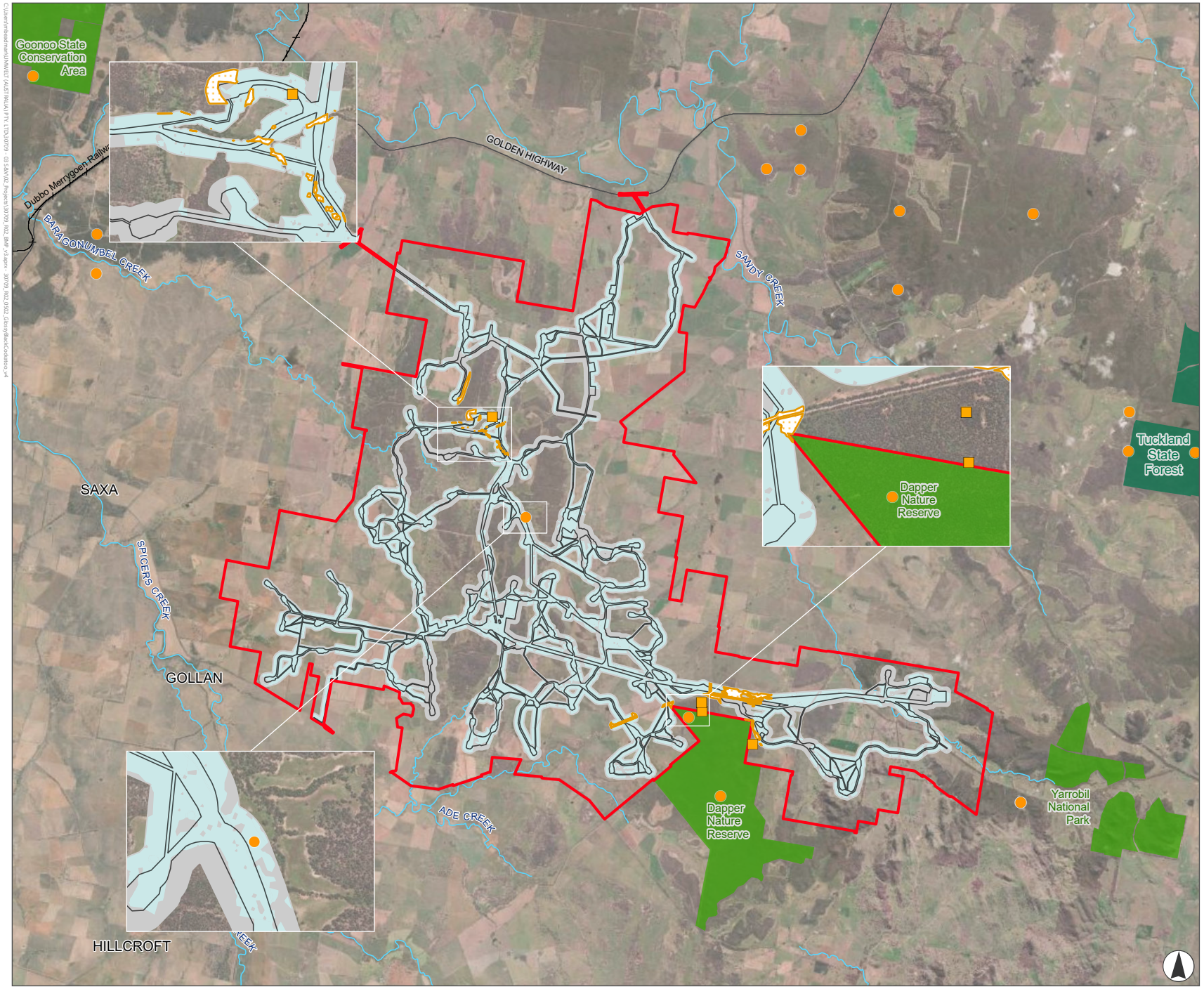
Kilometres

Scale 1:150,000 at A4
GDA2020 MGA Zone 55

Image Source: ESRI Basemap (2023) | **Data Source:** NSW DFSI (2023)

FIGURE 5.2

Identified Glossy Black-cockatoo Species Polygons within the Approved Development Corridor



Legend

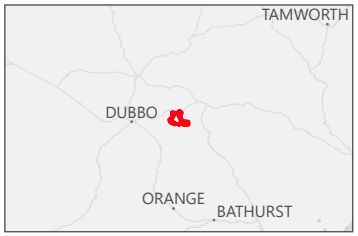
- Project Site
- Development Corridor
- Development Footprint
- Category 1 - Exempt Land
- State Forest
- NPWS Reserve
- Road
- Railway
- Waterway
- Glossy Black-cockatoo Species Polygon

Umwelt TS records

- Glossy Black-cockatoo

NSW BioNet Atlas TS records

- Glossy Black-cockatoo



0 2.5 5

Kilometres

Scale 1:150,000 at A4
GDA2020 MGA Zone 55

Image Source: ESRI Basemap (2023) | **Data Source:** NSW DFSI (2023)

5.2 Project Activities and Potential Biodiversity Impacts

Potential biodiversity impacts, including key direct impacts associated with native vegetation clearing, are summarised in **Table 5.4**. These are listed against relevant Project phases to be completed within Stage 1 of the Project, including pre-construction minor works, construction works and operation and maintenance (excluding the battery storage system). Where Project-specific biodiversity avoidance, mitigation and management measures are relevant, this is indicated with the corresponding section number.

Table 5.4: Project Phases and Relevant Impacts

				Relevant Avoidance, Mitigation and Management Measures								
Project Phase (Stage 1)	**Approximate Duration**	**Activities**	**Potential Biodiversity Impacts**	**Detailed Design Section 6.1.1**	**Vegetation Clearing Procedures Sections 6.1, 6.4**	**Offsetting Section 6.10**	**Native Fauna Sections 6.2, 6.3, 6.4**	**Weeds, Pathogens and Vertebrate Pests Section 6.5**	**Bushfire Section 6.6**	**Soil and Water Section 6.7**	**Noise, Dust and Light Section 6.8**	**Rehabilitation Section 6.9**
Pre-construction Minor Works	6-8 months	Surveys, overhead line safety markings, building and road dilapidation surveys, investigative drilling, excavation or salvage, minor clearing or translocation of native vegetation, establishing temporary site offices, installation of environmental impact mitigation measures, wind monitoring masts and construction of minor access roads and minor adjustments to services/utilities.	Minor clearing of native PCTs, TECs and threatened species habitat, fauna interactions, weed and pathogen spread	Relevant	Relevant	Relevant	Relevant	Relevant	Relevant	Relevant	Relevant	Relevant
Construction	40 months	Including but not limited to the carrying out of any earthworks and construction of ancillary infrastructure and excluding any works defined as pre-construction minor works.	Clearing of native PCTs, TECs and threatened species habitat, fauna interactions, weed and pathogen spread, bushfire risk, indirect soil and water impacts, noise, dust and light	Relevant	Relevant	Relevant	Relevant	Relevant	Relevant	Relevant	Relevant	Relevant
Operation and Maintenance	30 years	Ongoing monitoring and maintenance of all Project infrastructure, including replacement of major components (e.g. WTG blades) as required and land management within the Development Corridor	Fauna interactions including bird and bat strike, minor weed and pathogen spread, bushfire risk	-	-	-	Relevant	Relevant	Relevant	-	-	-

6 Biodiversity Impact Avoidance, Mitigation and Management

6.1 Minimising Native Vegetation Disturbance

The management measures described in the following sections will ensure that potential impacts of native vegetation clearing are minimised, particularly for sensitive vegetation types and habitat. Where vegetation is removed, this will be conducted in a manner to minimise related impacts to fauna.

Unless specified, the management measures described below are applicable to all fauna groups, including potential threatened fauna and migratory species (**Section 4.6.2**) and those with identified habitat clearing limits (refer **Table 5.2**).

6.1.1 Detailed Design

Prior to and during construction, the Project will be subject to a detailed design process, to be undertaken by the Contractors for their scope of works. The detailed design process will:

- Confirm which WTG locations will be constructed from the approved locations
- Identify the final micro-sited locations of those WTGs and associated infrastructure
- Establish a 200 m buffer from the surveyed boundary of the Dapper Nature Reserve, excluding the final micro-siting of all WTGs to the full buffer extent, in accordance with Development Consent Condition A8(e) (refer to **Section 6.1.2**)
- Ensure ancillary facilities are located outside the 200 m buffer from the surveyed boundary of the Dapper Nature Reserve, consistent with the WTG buffer requirement
- Assess construction requirements, site compounds and laydown areas
- Consider the construction of new access tracks or upgrades to existing tracks proximate to, or on the interface with, Dapper Nature Reserve in accordance with Development Consent Condition B35
- Identify micro-sited location of ancillary infrastructure to be constructed for the Project
- Provide detailed civil and electrical designs for most infrastructure, including the clearance limits required during construction
- Result in a Final Development Footprint inclusive of all earthworks associated with permanent infrastructure and temporary facilities required for the construction of the Project.

The detailed design process will seek to minimise clearing of native vegetation, including key threatened species habitat and hollow-bearing trees. This will be achieved through selection of construction methodologies, a defined and reduced construction footprint, designing roads, cable routes and other hardstand areas in previously disturbed areas, consolidating linear infrastructure disturbance impacts where possible (e.g. underground cable routes) to minimise fragmentation of undisturbed areas, selecting direct access routes to WTGs to limit the area of ground disturbance, and reducing disturbance required for cut and fill batters.

Importantly, the detailed design process will assess compliance with the native vegetation clearing limits. The maps and quantification of the Final Development Footprint will be periodically reviewed and updated consistent with stages of detailed design and construction.

6.1.2 Micro-siting of Infrastructure

Prior to commencing construction, micro-siting of WTGs and ancillary infrastructure will be undertaken to inform the detailed design (see **Section 6.1.1**), and the final layout of Project infrastructure. Micro-siting will involve representatives from SCWF, the Contractors, design engineers and environmental consultants. The need for further micro-siting may arise during construction to minimise impacts or to address construction conflicts and complexities.

Any micro-siting will be undertaken to comply with Development Consent Condition A8. This includes:

- Limiting surface disturbance to within the Development Corridor (with the exception of meteorological masts) as shown in **Figure 1.2**;
- No WTG will be moved more than 100 metres from the relevant GPS coordinates shown in Appendix 1 of the Development Consent;
- WTGs T47 and T58 must not be micro-sited closer to NSW Telecommunications Authority's microwave links;
- Proximity of the WTG provides a separation of at least 50 m from the canopy of existing native vegetation to the tip of the WTG blade, or where the proposed location of the tip of the blade of a wind turbine is already within 50 m separation distance of the canopy of existing native vegetation, the tip of the blade of the wind turbine at the revised location is not any closer to the existing native vegetation;
- Proximity of WTG is at least 200 m away from the surveyed boundary of Dapper Nature Reserve;
- Revised locations of WTGs and/or ancillary infrastructure would not result in any non-compliance with the conditions of the Development Consent.
- Meteorological masts will be located within the Development Corridor where possible and their development will not result in any non-compliance with the conditions of the Development Consent.

In addition, the following parameters will be considered when determining the micro-sited position of WTGs and ancillary infrastructure:

- Reducing the area of native vegetation to be cleared, in particular TECs, hollow-bearing trees and vegetation identified as habitat for threatened species;
- Siting in areas that are already cleared, for example, existing tracks and disturbed areas, or where vegetation is sparse;
- Maximising terrain features to support construction;
- Enabling safe access and egress for personnel and over-dimensional equipment;
- Identifying optimal positioning of ancillary infrastructure;
- Constructability and geotechnical constraints; and
- Optimising energy yield;

6.1.3 Minimising Loss of Hollow-bearing Trees

In accordance with Development Consent Condition B23(ii), impacts to hollow-bearing trees are to be minimised during construction activities. The following controls will be implemented:

- Where WTGs, roads and ancillary infrastructure occur in areas where hollow-bearing trees have been identified or likely to occur, an overall assessment will be undertaken to assess the general layout and design to identify opportunities where hollow-bearing tree loss could be minimised;
- Undertaking hollow-bearing tree surveys at all WTG locations (surveying all trees within a 150 m radius of the approved WTG location) so that the blade tip is at least 50 m from the canopy of existing hollow-bearing trees (refer **Section 6.1.2** for methodology);
- Restrict storage and access by plant and vehicles to the dripline of hollow-bearing trees;
- Siting infrastructure and undertaking temporary disturbance (i.e. compound, laydown areas and temporary access tracks) in areas that are already cleared or where vegetation is sparse (for example, existing tracks and disturbed areas);
- Identifying and marking hollow-bearing trees that occur with 5 m of the construction impact area for their protection;
- Where feasible and reasonable adapt construction methodologies at particular locations to protect hollow-bearing trees that would have otherwise been impacted by construction activities; and
- During operations, if it is identified that a tree needs to be removed a hollow-bearing tree survey will be undertaken to determine feasibility of retention.
- As described in **Section 6.1.5**, there are specific pre-clearance surveys that are required to be undertaken to identify Glossy black-cockatoo nesting activity within hollow-bearing trees. The EPBC

Approval defines ‘suitable hollow bearing trees for Glossy black-cockatoos’ as *living or dead trees with hollows greater than 15cm diameter and high than 8m above the ground*.

6.1.4 Demarcation of Clearance Boundaries

The Contractor’s detailed design will define the disturbance boundaries required for construction of the Project to ensure any native vegetation or fauna habitat located outside of the Approved Development Corridor is not cleared, in accordance with Condition B22 of the Development Consent. Where proximate to the Dapper Nature Reserve boundary, the design will identify the nature reserve boundary relative to the Approved Development Corridor and associated assets. It is intended that the boundaries will be digitally captured and displayed within the Project survey and GIS databases. This data will be made available both digitally and in hard copy map format to inform and guide vegetation clearing, and post-construction for land preparation and rehabilitation requirements. The data will include all impact-limited biodiversity features within the Final Development Footprint (that is, those for which impact avoidance is required and / or proximity encroachment is not permitted). The Contractors will be responsible for demarcating vegetation clearing boundaries based on the detailed design and construction requirements, and as detailed in **Section 6.1.1**.

6.1.5 Management of Vegetation Clearing

The following sections detail the vegetation clearing controls to be implemented during construction of the Project or any other time during the Project life that requires vegetation clearing.

Vegetation Disturbance Permit

Prior to any vegetation clearing or proposed disturbance activity, the Contractor is responsible for the development of a Vegetation Disturbance Permit (VDP) procedure, to the satisfaction of SCWF. The VDP procedure must provide capability for:

- Pre-clearing
  - Identify the proposed work areas;
  - Confirm that the proposed works are within the final detailed design; and
  - Estimate the area (ha) of vegetation to be cleared, and confirm that this is within the approved clearing limits.
- Construction
  - Pre-clearing procedure has been completed;
  - The vegetation clearing procedure has been communicated to all relevant personnel;
  - Implementation of the vegetation clearing procedure;
  - Implementation of any active fauna management, including details of capture and release;
  - Details of any unexpected finds;
  - Any relevant information for salvage of resources (see **Section 6.1.6**); and
  - Any relevant information for future rehabilitation or revegetation (see **Section 6.9**).

The VDP procedure will be implemented by the Contractor for all areas where vegetation clearing or disturbance is proposed.

Pre-clearance Survey

A vegetation pre-clearing survey procedure will be developed by the Contractor prior to commencement of vegetation clearing. The outcomes of pre-clearance survey will inform the VDP, and relevant management measures that are applicable for identified fauna or habitat.

The pre-clearance survey procedure will include a preliminary inspection of the Approved Development Footprint by the Contractor prior to clearing to determine:

- The area of native vegetation to be cleared, including mapped TECs;

- The location of hollow-bearing trees;
- Potential habitat features located within proposed disturbance areas that may require management during clearing;
- Habitat features (such as large fallen logs and hollows) that can be salvaged where practicable for reuse in rehabilitation areas or in adjoining non-disturbed native vegetation areas (**Section 6.1.6**);
- Resident fauna, including actively nesting birds, mammals, tree hollows that may contain roosts, nests or dens, or suspected active microbat roosts that may require active management prior to or during disturbance (see active management protocols below);
- Visual inspection to identify any farm dams which may be impacted;
- The presence of weed species in proposed work areas, including an estimation of number and spread, to determine if weed management actions are required prior to vegetation clearing to prevent further spread;
- The presence of any previously unrecorded threatened flora or fauna species requiring management under the unexpected finds (refer to **Section 6.4**).

The pre-clearance survey is required to be undertaken in all areas of the following vegetation zones (as detailed in **Section 4.5.1**) where vegetation clearance (removal of trees, shrubs, ground layer) or disturbance (pruning or trimming of branches, mowing or slashing) is required for the Project:

- PCT 81 - Western Grey Box - cypress pine shrub grass shrub tall woodland in the Brigalow Belt South Bioregion
  - Vegetation Zone 1 – Moderate to Good
- PCT 266 - White Box grassy woodland in the upper slopes sub-region of the NSW South Western Slopes Bioregion
  - Vegetation Zone 3 – Moderate to Good
  - Vegetation Zone 4 – Thinned Canopy
  - Vegetation Zone 5 – Planted
- PCT 267 - White Box - White Cypress Pine - Western Grey Box shrub/grass/forb woodland in the NSW South Western Slopes Bioregion
  - Vegetation Zone 7 – Moderate to Good
  - Vegetation Zone 8 – Thinned Canopy
- PCT 272 - White Box - Black Cypress Pine - red gum +/- Mugga Ironbark shrubby woodland in hills of the NSW central western slopes
  - Vegetation Zone 10 – Moderate to Good
  - Vegetation Zone 11 – Shrubby
  - Vegetation Zone 12 – Thinned Canopy
- PCT 281 - Rough-Barked Apple - red gum - Yellow Box woodland on alluvial clay to loam soils on valley flats in the northern NSW South Western Slopes Bioregion and Brigalow Belt South Bioregion
  - Vegetation Zone 14 – Moderate to Good
- PCT 467 - Blue-leaved Ironbark - Black Cypress Pine shrubby sandstone open forest in the southern Brigalow Belt South Bioregion (including Goonoo)
  - Vegetation Zone 16 – Moderate to Good
  - Vegetation Zone 17 – Shrubby
  - Vegetation Zone 18 – Thinned Canopy
- PCT 468 - Narrow-leaved Ironbark - Black Cypress Pine +/- Blakely's Red Gum shrubby open forest on sandstone low hills in the southern Brigalow Belt South Bioregion (including Goonoo)
  - Vegetation Zone 20 – Moderate to Good

There is no minimum clearance or disturbance area threshold to trigger the pre-clearance surveys.

The vegetation zones listed above are all those vegetation communities that are predominantly treed. The remaining vegetation zones listed below are predominantly derived grassland communities and that do not support intact tree canopy or shrub layers. However, as they are derived communities from parent treed vegetation communities, scattered trees and shrubs do occur. The pre-clearance surveys are therefore required in the following vegetation zones where the removal of trees or shrubs or disturbance (pruning or trimming of branches) is required for the Project.

- PCT 81 - Western Grey Box - cypress pine shrub grass shrub tall woodland in the Brigalow Belt South Bioregion
    - Vegetation Zone 2 – Derived Native Grasslands
- PCT 266 - White Box grassy woodland in the upper slopes sub-region of the NSW South Western Slopes Bioregion
    - Vegetation Zone 6 – Derived Native Grasslands
- PCT 267 - White Box - White Cypress Pine - Western Grey Box shrub/grass/forb woodland in the NSW South Western Slopes Bioregion
    - Vegetation Zone 9 – Derived Native Grasslands
- PCT 272 - White Box - Black Cypress Pine - red gum +/- Mugga Ironbark shrubby woodland in hills of the NSW central western slopes
    - Vegetation Zone 13 – Derived Native Grasslands
- PCT 281 - Rough-Barked Apple - red gum - Yellow Box woodland on alluvial clay to loam soils on valley flats in the northern NSW South Western Slopes Bioregion and Brigalow Belt South Bioregion
    - Vegetation Zone 15 – Derived Native Grasslands
- PCT 467 - Blue-leaved Ironbark - Black Cypress Pine shrubby sandstone open forest in the southern Brigalow Belt South Bioregion (including Goonoo)
    - Vegetation Zone 19 – Derived Native Grasslands
- PCT 468 - Narrow-leaved Ironbark - Black Cypress Pine +/- Blakely's Red Gum shrubby open forest on sandstone low hills in the southern Brigalow Belt South Bioregion (including Goonoo)
    - Vegetation Zone 21 – Derived Native Grasslands
- Non-PCT (non-native pasture, cleared, Category 1 – Exempt Land)

Pre-clearance surveys will comprise the following:

- Meandering walked transects throughout the vegetation to be impacted actively searching for prominent fauna habitat (i.e. bird nests, tree hollows, dead trees with cracks/fissures or peeling bark, substantial log piles, termite mounds, rocky outcrops)
    - Transects are not required to be uniform but need to be done to a level of detail that ensures that present habitat can be identified. In some cases depending on the nature of the vegetation community, this may only require a single transect, in others this may require two or more transects.
- Any identified fauna habitat will be digitally recorded electronically with a hand-held GPS or field-based GIS platform. Details should include but not be limited to:
    - Location
    - Time and date
    - Recorder
    - Type of habitat
    - Details on the habitat (i.e. DBH of tree, size/diameter of hollow(s), sign of use…etc)
    - Any hazards (i.e. bee-hive, hanging branches)
    - Photo(s)
- Identified habitat will be physically marked/identified through the following:
    - For habitat trees (i.e. hollow bearing trees and/or dead habitat trees, bird nests…etc), a minimum of two (one side and the other) large ‘H’ will be sprayed on the trunk with fluoro paint (pink or orange is most commonly used)
    - Fluorescent flagging tape will be used to prominently identify the location of the recorded habitat (e.g. placed around the trunk, placed around branches…etc)

Any records of breeding activity of threatened fauna species identified during pre-clearance surveys will be reported to CPHR within five business days after positive identification. Reporting will include species identification, location details and a summary of the management measures implemented to avoid or minimise impacts.

Pre-clearance Survey – Barking Owl

An additional protocol will be applied for any hollow bearing trees identified from the pre-clearance survey (described above) that is considered a potential barking owl hollow bearing tree. As per the TBDC profile for the species (as of August 2025), a potential barking owl hollow bearing tree is:

- *a living or dead tree with a hollow >20 cm diameter that occurs >4 metres above the ground.*

For these potential barking owl hollow bearing trees, the following additional pre-clearance procedures will be undertaken with the objective being to confirm whether or not the hollow is or has been used by barking owl (as opposed to another owl species):

- Detailed search around the entire base of the tree and its branches, looking for sign of fresh or old white-wash.
- Use a drone and/or any form of an inspection camera (e.g. GoPro type camera on end of extension pole, flexible endoscopic cameras) to inspect the entrance of the hollow (for signs of use) and if possible determine if the hollow is in use by a barking owl, or any other fauna species.
    - If the hollow is confirmed to be in use by another fauna species other than barking owl, the following process relating to regurgitated owl pellets is NOT required.
    - If the hollow is confirmed to be in use by barking owl, the following process relating to regurgitated owl pellets is NOT required.
    - If the hollow is found to be not currently in use, or it is inconclusive, the following process relating to regurgitated owl pellets IS required.
- Depending on the outcomes of the two pre-clearance survey processes above, detailed searches around the entire base of the tree looking for fresh or old regurgitated owl pellets would be undertaken. Any pellets found that are considered to be or have the potential to be produced by a barking owl will be collected, labelled accordingly and sent to an expert for analysis of the contents to allow a conclusion to be made of the owl species which produced it.
    - The hollow bearing tree associated with the sampled regurgitated pellet should be treated precautionarily as a barking owl hollow bearing tree until results of provided.
    - Additional inspections of the hollow bearing tree associated with the sampled regurgitated pellet could be undertaken to provide further clarity on the species of origin.

Pre-clearance Survey – Glossy black-cockatoo Breeding Season (March to August)

In addition to the pre-clearance measures identified above, for any clearing scheduled to occur within Glossy black-cockatoo habitat during its breeding season (i.e. March to August), a targeted pre-clearance survey must be completed by a suitably qualified and experienced ecologist to identify the presence and location of any glossy black-cockatoo nesting activity within 72 hours of clearing works commencing, in accordance with EPBC Approval Condition 4. In the event nesting activity is identified, the protocol outlined in **Section 6.3** will be implemented.

- Areas of sensitive vegetation identified (that is, vegetation and habitat for which there is a clearing limit specified in Table 1 and Table 2 of Appendix 5 in the Development Consent, and EPBC Approval Condition 3 will be physically demarcated using a clear and consistent method which is developed by the Contractor in consultation with SCWF (e.g. bunding, tape, spray paint, etc.).
- Hollow-bearing trees within the Approved Development Footprint that will be impacted will be marked prior to clearing for the purpose of pre-clearance survey.
- Hollow-bearing trees within 5 m of the construction impact area that will be retained will be marked prior to clearing activities, for the establishment of an exclusion zone and protection from impacts. Fauna habitat features, resident fauna including actively nesting birds identified by the process above will be physically demarcated using a clear and consistent method which is developed by the Contractor in consultation with SCWF.

Vegetation Clearing

In accordance with the pre-clearance survey procedure, pre-clearance surveys must be undertaken by suitably qualified and experienced ecologists. Following pre-disturbance sign-off of the VDP, completion of

pre-clearance surveys and implementation of any identified site-specific management measures, clearing activities may commence. Tree felling must be completed within two weeks of the completion of pre-clearance surveys. The Contractor will be responsible for implementation of management measures to minimise disturbance to fauna and allow material salvage where applicable. These include:

- Supervision of clearing activities by appropriately qualified and experienced ecologists (or spotter/catchers), with the capacity to direct activities and manage impacted fauna;
- Initial felling of non-habitat trees or branches towards disturbed areas, rather than adjacent retained vegetation;
- Reinspection of habitat trees and other features identified during pre-clearance surveys for signs of current occupation;
- Nudging the trunk of habitat trees (with heavy machinery) as high as possible, waiting 30 seconds and then repeating the process a few times to encourage fauna to abandon trees, followed by rechecking for signs of occupation;
- Lowering of habitat trees as gently as possible, with care not to obstruct hollows and allow for fauna to escape, followed by rechecking for signs of occupation;
- Minimisation of further disturbance to felled habitat trees for a least one night to allow remaining fauna to escape;
- Management of interactions with native fauna in accordance with the measures described in **Section 6.1.5** (see below Fauna Management Protocol); and
- Marking and establishment of exclusion zones for habitat trees that are retained within 5 m of construction areas.

Fauna Management Protocols

If active fauna management is required as a result of the pre-clearing inspections, a qualified ecologist or spotter/catcher will be present to supervise clearing activities and manage any impacts and /or relocation of fauna. For example, the identification of tree hollows that may contain roosts, nests or dens, or the presence of resident fauna including actively nesting birds or mammals. In any area to be cleared, non-habitat vegetation is to be cleared first. Any fauna habitat (or resident fauna including actively nesting birds or suspected active microbat roosts) demarcated during the pre-clearing procedure is then to be left standing overnight to encourage the self-relocation of fauna. The fauna habitat will then be cleared in accordance with the following sections.

Hollow dependent species (including microbats)

- Habitat trees with hollows that may contain roost, nest or dens, or suspected active microbat roosts will be managed with the following actions, where it is deemed safe;
- Shaking the tree with machinery prior to clearing to encourage resident fauna to move to an alternative site;
- Soft pushing the tree to the ground in order to reduce the likelihood of disturbance to the habitat feature/roost/resident fauna present;
- Preferentially positioning the tree on the ground so the entrance to the hollow faces upwards (i.e. so fauna are able to exit);
- Inspecting the felled tree to confirm whether fauna have exited the tree; and
- If there are fauna remaining inside the tree which have not exited, leaving the felled tree overnight to allow any remaining fauna time to exit, which will be confirmed by reinspection on the following day.

Arboreal mammals

Where habitat trees are present, and the presence of arboreal mammals is suspected or known, they will be managed with the following actions, where safe:

- Shaking the tree with machinery to be used during clearing activities to encourage the animal to move to an alternative location;
- Soft pushing the tree to the ground in order to reduce the likelihood of disturbance to the habitat feature/animal present;

- Inspection of the felled tree to confirm that the mammal has relocated from the habitat feature; and
- Where the mammal is still present, leave the felled tree overnight to encourage the animal to relocate, which will be confirmed by reinspection on the following day.

Nesting birds

Where practicable, clearing activities will be scheduled to minimise disturbance to nesting birds (scheduled outside the spring season of September to December). Where clearing must occur during the breeding season, the tree is to be inspected from ground level for nests immediately prior to clearing to ensure that the nest is not active. If the nest is not active, the tree can be cleared.

Where an active nest of a threatened species is identified, the nest must not be removed, and the removal of the habitat tree must be postponed until birds have fledged. Clearing of trees within 100 m of an active threatened species nest will also be avoided until fledging has occurred, unless otherwise advised by a suitably qualified ecologist, to minimise the risk of nest abandonment. However, if there are no hatched young (i.e. un-hatched eggs), and adult birds of the threatened species have abandoned the nest, as determined by a suitably qualified ecologist, the habitat tree may may only be removed following prior consultation with CPHR.. Where possible and safe to do so, the un-hatched eggs will be collected and taken to a wildlife carer for rearing and later release, subject to CPHR consultation and approval.

Where a nest is active for a non-threatened species, management will be undertaken by a suitably qualified ecologist to minimise impacts to nesting birds. The birds present (generally fledglings) may be collected where safe to do so, and taken to a wildlife carer, prior to later release. The nest may then be removed from the tree and an inspection undertaken to confirm the nesting activity has ceased. The tree will then be cleared as soon as practicable to prevent nesting activity recommencing.

Where retention of a tree containing an active nest of a non-threatened species would result in safety risks or unreasonable construction constraints, works may proceed following assessment by a suitably qualified ecologist, with appropriate measures implemented to minimise impacts to nesting birds. Continuation of works should be considered on a case by case basis, by a suitably qualified ecologist. Consideration will be given to measures to avoid or minimise disturbance to the nest, the expected fledging timeframe, , whether the construction methods or sequencing can be adapted to avoid impacts, , and whether works can be carried out safely while the tree is in place. All efforts and consideration will be made to avoid clearing trees containing an active nets of a non-threatened species, and such an impact will only occur where the particular tree is considered critical path for maintaining the construction schedule of the Project.

Barking Owl Nesting Activity

In accordance with NSW Approval Condition B26(c)(iv), the Project will minimise its impacts on barking owl by implementing the following additional nesting activity protocol. For any hollow bearing tree that is confirmed, or strongly believed to be actively used by barking owl, clearing must not occur during breeding season (July – November):

- Within 100 m of the identified hollow bearing tree, and
- Until a suitably qualified ecologist has confirmed that:
  - All young barking owl at the location of the hollow bearing tree have vacated the hollow, and/or
  - Nesting activity has ceased.

Glossy black-cockatoo Nesting Activity

In accordance with EPBC Approval Condition 5, if Glossy black-cockatoo nesting activity (defined as *evidence of Glossy black-cockatoo tending to hollows, including but not limited to, birds observed entering or leaving hollows, birds in hollows, evidence of chipping at hollow entrances, observations of birds moving decayed debris, detection of calling of adult or chicks from within hollows or near the entrance of hollows*) is identified during the specific Glossy black-cockatoo pre-clearance surveys identified above, clearing must not occur:

- Within 100 m of the nesting activity, and
- Until a suitably qualified ecologist has confirmed that:

- All young Glossy Black-cockatoo at the location of the nesting activity have vacated the nest, and/or:
- Nesting activity has ceased.

6.1.6 Salvage of Habitat Features and Vegetative Materials

Tree felling presents opportunities for salvage of materials that may benefit biodiversity outcomes in adjacent areas (subject to landowner agreement) and/or rehabilitation of temporary disturbance areas. This may include:

- Salvage of habitat features such as hollows (cut out from whole trees), large hollow logs and boulders;
- Collection of fruits and seeds from native species occurring within disturbance areas, where practicable, for use in rehabilitation and revegetation activities. Seed collection will be undertaken by suitably qualified personnel at appropriate seasonal times, targeting local native species characteristic of the affected vegetation communities. Collected seed will be stored in appropriate conditions to maintain viability and will be used in propagation or direct seeding programs for rehabilitation of temporary disturbance areas and other revegetation works across the Project Site, reducing reliance on externally sourced seed stock;; and
- Removal, mulching and/or appropriate storage of cleared vegetation (refer **Section 6.9.1**).

If the Dapper Nature Reserve is considered for placement of salvaged materials material to facilitate rehabilitation activities, further environmental assessment and authorisation from the NPWS will be required prior to the works being undertaken.

6.2 Protection of Remnant Vegetation

Implementation of the measures described in **Section 6.1** will ensure that vegetation clearing is avoided and minimised where practicable. Where clearing is conducted, the measures also ensure that impacts to adjacent remnant vegetation and resident fauna are mitigated. Additional to this, the Contractor is responsible for:

- Ensuring vehicles, mobile plant and personnel remain within the Final Development Footprint;
- Locating laydown areas and other temporary disturbance activities in areas within the Approved Development Footprint; and
- Minimising further spread of weeds (refer **Section 6.5.1**) into adjacent remnant vegetation.

6.3 Minimising Impacts on Native Fauna

The Contractor is responsible for minimising impacts to fauna throughout construction of the Project, as well ensuring that appropriate handling techniques and management practices are applied as needed.

Management measures include:

- Measures as described in **Section 6.1** for tree felling, which will minimise disturbance of habitat and related impacts to fauna;
- Additional measures related to prevention of strike from WTG blades as described in the BBAMP (refer **Section 6.3.1**);
- Barricading and/or placement of ramps in open trenches and pits during construction to minimise ingress of fauna and allow egress;
- Either cover or use escape ramps in open trenches and pits at the end of each day’s work during construction to prevent ingress of fauna overnight.
- Access restrictions and driver training to reduce traffic, reduce speed and safely minimise fauna strike;
- For any fauna that are considered to be displaced or at risk of harm;
  - removal of threats where practicable and safe to do so;
  - referring to advice from on-ground ecologists, or contact the Wildlife Information, Rescue and Education Service (WIRES - 1300 094 737);
  - allowing uninjured fauna the opportunity pass through the area;

  - if necessary, capture by suitably qualified personnel and release as soon as possible into nearby, suitable and secure habitat (nocturnal animals should be held until dusk for release);
  - if release is to occur on the Dapper Nature Reserve, the act must be authorised by NPWS and may require licencing under the *NSW Biodiversity Conservation Act 2016*.
  - relocation of deceased fauna into adjacent vegetation, before checking pouches (e.g. kangaroo, koala, wombat or possum) for live young; and
  - transportation of injured or immature fauna to the nearest veterinary clinic or wildlife carer as soon as possible for assessment, treatment and care.
- Recording of all observed, captured, injured, deceased and/or released fauna in an appropriate register.
- Specific Glossy black-cockatoo pre-clearance surveys as discussed in **Section 6.1.5**.

6.3.1 Bird and Bat Adaptive Management Plan

A Bird and Bat Adaptive Management Plan (BBAMP) has also been developed for the Project to meet the requirements of Condition B27 of the Development Consent and Condition 10 of the EPBC Approval. The BBAMP includes monitoring requirements to be implemented throughout the operation and maintenance of the Project, as well as response measures to be implemented upon discovery of bird and bat carcasses within the Project Site. Mitigation and management measures are also detailed throughout the BBAMP.

Additionally, the BBAMP will also be prepared in a manner to satisfy Consent Condition B26 (c) (iv), which required the Project to minimise the impacts of the development on fauna species within the disturbance footprint and its surrounds, including glossy black cockatoo and barking owl.

6.4 Unexpected Threatened Flora and Fauna

If unexpected threatened flora or threatened/migratory fauna species (including but not limited to potential species listed in **Table 4.3** and **Table 4.5**) are observed or suspected to be at risk, the measures described above also apply, with particular care to avoid and/or minimise further harm. The Contractor's Environmental Advisor must also be notified within one business day of identification/confirmation, who will proceed to:

- Notify SCWF and/or relevant government agencies;
- Provide advice on additional species-specific measures may be directed;
- Arrange for a qualified ecologist, wildlife carer or animal handler for further assessment, relocation and/or advice as required; and
- Notify site staff of the threatened species find via toolbox talks.

6.5 Weeds, Pathogens and Vertebrate Pests

The presence of weeds, pathogens and vertebrate pests are generally exacerbated by disturbance, and have the potential to substantially impact biodiversity values. A large portion of the Project Site has been subject to prior clearing and agricultural activity, such that the Project is unlikely to introduce any significant new threats. However, ongoing management of these components, and prevention of further spread remains a priority.

6.5.1 Weeds and Pathogens

High threat weeds that have been recorded at the Project Site are listed in **Table 4.4**. Local Land Services (2022) have listed specific objectives such as eradication, containment or asset protection for a number of the species listed in **Table 4.4**. The Contractor Environmental Advisor will implement biosecurity controls during construction of the Project, while the SCWF Project Environmental Advisor will assume responsibility for this throughout the operational life of the Project.

Prevention of weed spread to or across the Project Site will substantially reduce costs for ongoing treatment, however the spread of weeds is difficult to avoid entirely and active treatment/removal is likely to be required, particularly during the construction phase when disturbance activity and risk of spread is at a peak.

The spread of pathogens can also be exacerbated by disturbance activities, if unmanaged. The Project is considered unlikely to contribute to further spread of pathogens, however active management remains a priority, particularly in proximity to Dapper Nature Reserve. No management activities will occur in the Dapper Nature Reserve unless a specific requirement is identified and without necessary assessment and authorisation by NPWS. Pathogens that may exist in the area are potentially impact native vegetation and frogs include:

- Dieback (*Phytophthora cinnamomi*);
- Myrtle rust (Pucciniales); and
- Amphibian chytrid fungus (*Batrachochytrium dendrobatidis*)

Ongoing management of weeds and pathogens is the responsibility of the Contractor and includes:

- Pre-clearance survey for high threat weeds, as described in Section 4.5.4 and Section 6.1.5;
- Annual quantitative survey for presence and extent of high threat weeds and pathogens, undertaken by a qualified and experienced ecologist during the construction phase, and compared with baseline data;
- Preparation of a weed dilapidation survey report, including weed mapping for the Project Site and information profiles for weed species that are identified during the dilapidation survey, or otherwise known to occur on the Project Site. Each weed profile must include the following information at minimum:
  - Description of the weed, growing cycles, habit, environmental impacts etc.
  - Example photograph(s) of the weed.
  - Biosecurity duty relevant to the weed, including any specific listing status under the Regional Strategic Weed Management Strategy. The weeds listed in **Section 4.5.4** will be managed in alignment with their relevant state weed management plan.
  - Details of other listing status (e.g. Weed of National Significance, High Threat Weed, etc).
  - Methods to minimise risk of establishment or spread of the weed.
  - Control methods for the weed required to demonstrate compliance with the Biosecurity Duty.
- Awareness training for all construction staff and contractors on high threat weeds, pathogens and prevention of further spread;
- Prevention of stock access to the Project Site where practicable and in consultation with host landowners;
- Prior to entering and leaving the Project Site, procedures for cleaning of vehicles, machinery and equipment, including the removal of all mud and plant matter, followed by washing with high pressure water where applicable;
- Keeping vehicles and machinery to dry surfaces and formed roads;
- Routine inspection of vehicles and machinery for mud, weed debris matter and weed seeds;
- Minimisation of soil disturbance where practicable;
- Certification of all imported building materials (e.g. soil and rubble) as free of weeds and weed seeds;
- Regular inspection of roadsides, laydown areas, buffer zones and stockpiles for presence of weeds (refer **Section 8.2**);
- Limiting movement of soil and vegetative materials across landowner boundaries, where practicable;
- Active treatment of high threat weeds as listed in **Table 4.4** and in accordance with the Central West Regional Strategic Weed Management Plan (Local Land Services, 2022), which may include mechanical removal, slashing, application of approved herbicides and biological control, by accredited personnel, according to product labels as applicable to the weed being treated and in consultation with host landowners;
- Specific measures to ensure that adjacent agricultural land and native vegetation is not significantly impacted by herbicides (e.g. avoiding strong winds, consideration of waterways, adhering to product instructions etc.);
- Documentation of the above activities, including dates, locations, methods and monitoring outcomes; and
- Review of construction outcomes to determine requirements for ongoing weed management requirements during operations.

6.5.2 Vertebrate pests

Feral animal species such as foxes and deer have been observed within the Project Site, however populations are not expected to increase as a result of the Project. SCWF will continue to work with relevant landowners regarding the management of vertebrate pests. Implementation of control measures within work areas is the responsibility of the Contractor, and include:

- Appropriate waste management, ensuring that waste materials do not attract pests;
- Documentation of vertebrate pests sightings including date, location and description of activity;
- Should monitoring identify increased vertebrate pest activity proximate to the Dapper Nature Reserve, NPWS Mudgee Area will be notified, and appropriate management actions implemented in consultation as required.
- Relative to documented activity and in accordance with the Central West Regional Strategic Pest Animal Management Plan 2024-2028 (Local Land Services, 2024),active control including baiting, trapping, shooting, exclusion fencing and harbour destruction, as approved.

Additional pest control is implemented with the intention of reducing prey for predatory birds (e.g. control of rabbits to deter wedge-tailed eagles) that are vulnerable to blade strike, this is documented in the BBAMP.

6.6 Bushfire

The Project Site is identified as bushfire prone land by the NSW Rural Fire Service (RFS). The Contractor is responsible for the implementation of bushfire management measures during construction of the Project in accordance with the NSW Rural Fire Services (RFS) Planning for Bush Fire Protection Guide (RFS 2019), and in consultation with the RFS (including any requirements in relation to aerial firefighting). This will become the responsibility of SCWF during operations.

Detailed measures are also described in the Emergency Plan. In summary, these include:

- Provision of fire response training for relevant personnel;
- Identification of fire related hazards, including accumulated rubbish and flammable substances;
- Establishment of appropriate asset protection zones, or buffers between sensitive infrastructure and bush fire hazards (e.g. adjacent vegetation) of a least 10 m, comprising a maintainable fuel-reduced physical separation (e.g. cleared firebreak);
- Provision of a dedicated water supply (including a water cart during the construction phase), fire suppression equipment and appropriate storage/maintenance of fuel and flammable liquids;
- Restrictions on hazardous work activities (e.g. hot works) during total fire bans; and
- Established procedures for notification of fire (e.g. call 000) and remaining safe during an emergency.

6.7 Soil and Water

Measures for the protection of soil and water will ensure that impacts to biodiversity impacts are minimised, particularly for riparian ecosystems.

6.7.1 Erosion and Sedimentation

Available soils information indicates a low erosion hazard for the majority of the Project Site, however upper slopes and areas within 40 m of defined streams may be highly erosive. Generally, topsoils are expected to be coarse to fine grained, non-sodic and non-dispersive, while subsoils are expected to be finer grained and potentially dispersive.

Erosion of soils and sedimentation of receiving creeks may lead to associated impacts to vegetation and aquatic fauna. Appropriate management of erosion and sedimentation is the responsibility of the Contractors within their respective areas of work, and particularly important during construction when areas may be cleared and soils exposed, potentially leading to gullying and sedimentation of waterways.

During detailed design and prior to construction, site-specific erosion and sediment control plans (ESCPs) will be prepared for each area by a Certified Professional in Erosion and Sediment Control (CPESC) and in accordance with Managing Urban Stormwater – Soils and Construction Volume 2C Unsealed Roads (DECC, 2008). The Project Soil and Water Management Plan, prepared in accordance with Development Consent Condition B21, should also be referred to for erosion and sedimentation control measures.

6.7.2 Contamination of Soils and Waterways

Waterway contamination is not considered a substantial risk for the Project, however potential impacts to aquatic fauna are also the responsibility of the Contractor and are managed appropriately. Relevant management measures include:

- Appropriately bunded storage of fuels, chemicals and liquids (including concrete batching and washout) a minimum of 50 m away from waterways and slopes of more than 10%, where practicable;
- Provision and maintenance of spills kits for management of accidental spills;
- Procedures to manage unexpected soil contamination;
- Appropriate classification and handling of waste materials; and
- Baseline and monthly upstream and downstream water quality monitoring for pH, electrical conductivity, turbidity, and total suspended solids (specific locations are defined in detailed design).

The Project Soil and Water Management Plan, prepared in accordance with Development Consent Condition B21, should also be referred to for appropriate control measures.

6.8 Noise, Dust and Light

Potential impacts to fauna from noise are expected to be negligible.

During construction and rehabilitation activities, water carts are used for dust suppression on unsealed roads and other areas with exposed soils.

Construction works are restricted to daytime hours where practicable, to minimise required lighting at night and associated light spill to surrounding areas. Potential impacts to nocturnal fauna from security and safety lighting are considered to be low. Relevant management measures include the use of light shields, motion detectors and timers.

6.9 Rehabilitation of Temporary Disturbance

Early rehabilitation activities will be focussed on temporary disturbance areas and will be completed progressively and as soon as reasonably practicable following construction, in accordance with Development Consent Condition B52.

Where practicable, landform stabilisation and reinstatement of soils will occur within approximately within 60 days of an area no longer being required for construction. Revegetation and seeding will generally be undertaken in the next suitable seasonal window to maximise establishment success, which may result in revegetation occurring up to 12 months after construction activities are completed in that area.

These are areas required only for construction, that may be rehabilitated when no longer required, and include:

- Site offices and compounds;
- Rock crushing facilities;
- Concrete batching plants;
- Stockpiles;
- Material storage compounds;
- Field laydown areas;
- Minor ‘work front’ construction access roads; and
- Meteorological masts.

For these areas, the Contractors will be responsible for landform stabilisation and re-establishment of a land use and vegetation type consistent with that which existed pre-disturbance. This approach will ensure that all areas are safe, stable, non-polluting and commensurate with pre-existing biodiversity values.

For a large portion of the Project Site and Approved Development Footprint, existing vegetation is classified as non-native agricultural land, and re-establishment of similar groundcover (e.g. pasture grasses) is acceptable. For any temporary disturbance areas with native PCTs, SCWF will endeavour to re-establishment a similar vegetation type. The types and extent of pre-disturbance PCTs are described in **Section 4.5** and presented on **Figure 4.2**. Where it is not possible to carry out permanent rehabilitation, interim rehabilitation strategies will be employed to minimise dust generation, soil erosion and weed incursion until such time that it is. The following sections describe specific measures that will be implemented for rehabilitation.

It is noted that further details regarding final rehabilitation of the Project Site at the time of decommissioning will be provided in the Stage 3 revision of this BMP.

6.9.1 Stockpiling of Soils and Vegetative Materials

For temporary disturbance areas, topsoils and subsoils will be removed and stored separately for re-use. Topsoil, subsoil, vegetation and habitat features that are removed, mulched and/or salvaged during construction will be used in adjacent areas, disposed or placed in stockpiles until they can be re-used for rehabilitation activities.

Appropriate measures for the management of stockpiles include:

- Placement within the same land parcel, avoiding movement across landowner boundaries, and as close as possible to the intended area of re-use;
- Avoidance of temporary fences or flagging, and exclusion from:
  - beneath the canopy (dripline) of remnant mature trees; and
  - within 50 m of waterways;
- Ensuring that stockpiles are long and low with a height less than 1.5 m to preserve soil structure and biology, avoid compaction and prevent heating and a resulting fire hazard; and
- If stockpiled for a long period of time, soils should be seeded with pasture grasses, and eventually re-spread in appropriate areas.

6.9.2 Land Preparation

Prior to seeding (either native or non-native species), for areas where topsoil (including seedbank) and/or subsoil have been removed, the following measures shall be considered:

- Gypsum may be added to dispersive subsoils to manage erosion.
- Available mulched vegetation that has been stockpiled may be turned into topsoil. For re-spreading this process provides improved surface stability, water retention and fertility for seed germination and vegetation establishment, however care should be taken not to over-apply and supress germination from the retained seedbank.
- Soils must be re-spread across the area to re-instate the original profile (i.e. subsoil underlying topsoil), with a minimum topsoil depth of 100 mm where resources allow. Where practicable, soils are returned to the same areas to ensure that soil type and seedbank are matched to pre-existing vegetation.
- Salvaged logs and/or biodegradable erosion control matting (e.g. jute mesh) may be used for particularly high-risk areas with dispersive topsoils (e.g. steep slopes and areas within 40 m of defined streams).
- To increase water infiltration and optimise establishment and growth of vegetation, topsoiled areas must be lightly ripped in parallel with contours to create a ‘key’ between the topsoil and the subsoil. During this process, tines must be lifted for approximately 2 m every 200 m to reduce the potential for channelised erosion on slopes greater than 10°. Ripping must be undertaken when soil is moist and immediately prior to any seeding for best results.
- Site-specific erosion and sediment control measures described in **Section 6.7** and ESCPs are implemented.

6.9.3 Fauna Habitat Enhancement

Salvaged habitat features such hollows (cut out from whole trees), large hollow logs and boulders may be used in adjacent areas (subject to landowner agreement) and/or rehabilitation areas to augment habitat complexity and encourage fauna return.

6.9.4 Vegetation Establishment

Rehabilitation and/or revegetation will be undertaken progressively in all temporary impact areas, that is, those areas that are not required to be maintained for the operational phase of the Project. This will aim to ensure that they are safe, stable, and non-polluting and reduce the total area exposed at any time in accordance with the Development Consent, including the re-creation of habitat for fauna.

With consideration to the future intended land uses, and the requirements for safe, stable, and non-polluting landscapes, existing vegetation communities in the Development Corridor will be used to inform the revegetation. Importantly, regeneration and restoration of disturbed areas will include the re-spreading of reserved topsoil containing a seed bank stock and propagules associated with the pre-disturbance vegetation community. Rehabilitation of internal access roads that are not required following construction will be undertaken.

Prior to the commencement of rehabilitation activities and once the detailed design is progressed and disturbance areas identified, the Contractors will prepare a Rehabilitation Management Program to the satisfaction of SCWF. The Program will be developed to ensure targets and species selection are appropriate in temporary impact areas where CEEC and threatened species habitat have been impacted. Note: The Rehabilitation Management Program cannot be provided within this BMP as it is dependent on the specific construction methodology to be implemented by the Contractor which is not yet established.

The Rehabilitation Management Program will include as a minimum:

- Identification of the pre-existing conditions/ land uses prior to construction;
- A program for the progressive rehabilitation activities in all disturbed areas (commencement and any follow up), which would be progressively updated during construction as areas become available for rehabilitation;
- Proposed rehabilitation methods (i.e. replacement of topsoil containing a seed bank, topsoil preparation, cover crop, seeding, mulching, watering regime etc). Note: this detail cannot be provided within this BMP as it is dependent on the specific construction methodology to be implemented by the Contractor which is not yet established;
- A diagram showing the location of areas to be rehabilitated, vegetation communities to be established and species composition based on the detailed design;
- Development of plant species mixes taking into consideration the pre-existing land use and condition, future land uses, and landowner requirements. Seed mixes will include an initial cover crop to stabilise the soil;
- Where rehabilitation works are to occur close to threatened communities or species habitat, revegetation will be with species native to the mapped communities where possible;
- Proposed physical controls/works to ensure long-term stabilisation of rehabilitated areas, including:
  - controls required to ensure stability of slopes;
  - provision of appropriate drainage infrastructure/ controls to prevent scouring or ponding;
  - measures to address scouring/ erosion occurrences
- Details of proposed weed control (hand removal, spot spraying, broad application of herbicide); and
- Details of rehabilitation monitoring required, including performance criteria, triggers for corrective action, corrective actions.

The Contractor will be responsible for implementing the Rehabilitation Management Program under the supervision of the SCWF. Rehabilitation will be monitored by the Contractor in accordance with **Section 8**.

6.10 Biodiversity Offsetting

In accordance with Development Consent Condition B24 (and EPBC Approval Condition 19), biodiversity credits of a number and class as specified within Table 1 and Table 2 of Appendix 5 of the Development Consent must be retired prior to carrying out any development that could directly or indirectly impact biodiversity values requiring offset.

To compensate for approved clearing extents within the Approved Development Footprint, offsetting requirements have been determined in accordance with the NSW Biodiversity Offsets Scheme (BOS) as per the BC Act. These are presented for each PCT in the form of required ecosystem credits in **Table 6.1** and for identified threatened species habitat in **Table 6.2**.

Table 6.1: Required Ecosystem Credits for Impacted PCTs

PCT	Zone ID	Condition Class	BC Act	EPBC Act	Approved Development Footprint (Impact) Area (ha)	Ecosystem Credits Required
81 - Western Grey Box - cypress pine shrub grass shrub tall woodland in the Brigalow Belt South Bioregion	1	Moderate to Good	EEC	EEC	1.0	39
	2	Derived Native Grasslands	EEC	EEC	1.7	33
266 - White Box grassy woodland in the upper slopes sub-region of the NSW South Western Slopes Bioregion	3	Moderate to Good	CEEC	CEEC	5	427
	4	Thinned Canopy	CEEC	CEEC	8.0	312
	5	Planted	CEEC	CEEC	2.0	57
	6	Derived Native Grasslands	CEEC	CEEC	6.7	152
267 - White Box - White Cypress Pine - Western Grey Box shrub/grass/forb woodland in the NSW South Western Slopes Bioregion	7	Moderate to Good	EEC	EEC	8.3	341
	8	Thinned Canopy	EEC	EEC	6.5	290
	9	Derived Native Grasslands	N/A	N/A	14.1	200
272 - White Box - Black Cypress Pine - red gum +/- Mugga Ironbark shrubby woodland in hills of the NSW central western slopes	10	Moderate to Good	N/A	N/A	30.4	1,150
	11	Shrubby	N/A	N/A	5.0	135
	12	Thinned Canopy	N/A	N/A	2.0	43
	13	Derived Native Grasslands	N/A	N/A	52.6	899
281 - Rough-Barked Apple - red gum - Yellow Box woodland on alluvial clay to loam soils on valley flats in the northern NSW South Western Slopes Bioregion	14	Moderate to Good	CEEC	CEEC	22.3	1,222
	15	Derived Native Grasslands	CEEC	CEEC	6.0	174

PCT	Zone ID	Condition Class	BC Act	EPBC Act	Approved Development Footprint (Impact) Area (ha)	Ecosystem Credits Required
and Brigalow Belt South Bioregion						
467 - Blue-leaved Ironbark - Black Cypress Pine shrubby sandstone open forest in the southern Brigalow Belt South Bioregion (including Goonoo)	16	Moderate to Good	N/A	N/A	53.7	1,741
	17	Shrubby	N/A	N/A	15.9	285
	18	Thinned Canopy	N/A	N/A	5.0	92
	19	Derived Native Grasslands	N/A	N/A	19.6	135
468 - Narrow-leaved Ironbark - Black Cypress Pine +/- Blakely's Red Gum shrubby open forest on sandstone low hills in the southern Brigalow Belt South Bioregion (including Goonoo)	20	Moderate to Good	N/A	N/A	1.9	46
	21	Derived Native Grasslands	N/A	N/A	2.1	25
Total					**275.3**	**7,798**

Table 6.2: Required Species Credits for Impacted Threatened Species Habitat

Common Name	Scientific Name	Habitat Type	Habitat Clearing Extent (ha)	Species Credits Required
Glossy Black-cockatoo	*Calyptorhynchus lathami*	Potential breeding habitat	15.1	649
Barking Owl	*Ninox connivens*	Potential breeding habitat	22.0	889
Total				**1,538**

In regards to **Table 6.2** above, it is noted that correspondence from DPHI dated 6 March 2025 has approved the removal of credit requirements for the pink-tailed legless lizard, following the completion of surveys between September and November 2024 during which the species was not recorded. The pink-tailed legless lizard previously had an assumed presence within the Development Corridor, generating 139 species credits. Should the species be recorded within the Project Site, the unexpected finds protocol outlined in **Section 6.4** will be triggered.

Additionally, in accordance with Condition B26(c)(iii) of the development consent, 53.8 ha of Box Gum Woodland CEEC is required to be securely conserved within a Biodiversity Stewardship Agreement, including:

- 31.3 ha of intact woodland;
- 9.9 ha of disturbed and modified woodlands; and
- 12.6 ha of derived native grasslands.

A Biodiversity Offset Strategy will be implemented to satisfy the biodiversity offset requirements of Condition B24, including the secure conservation of 53.8 ha of Box Gum Woodland CEEC within a Biodiversity Stewardship Agreement (BSA). Staging of credit retirement may be applied, subject to Planning Secretary agreement in accordance with Condition B24.

To support delivery of these requirements, Squadron Energy has secured land suitable for establishment of a Biodiversity Stewardship Site (BSS), known as 'Barberosa & The Escape', located on Nanangroe Road, Adjungbilly (Lots 1 and 2 DP1277828). The subject land comprises approximately 684 ha, within which the BSS will be established, and contains sufficient Box Gum Woodland to accommodate the required 53.8 ha conservation commitment.

The site contains biodiversity values capable of generating ecosystem and species credits some of which are consistent with the Amended BDAR commitments.

The following ecosystem credit values are present at the BSS site:

- Inland Riverine Forests (≥50% and <70% cleared)
- White Box – Yellow Box – Blakely's Red Gum Grassy Woodland and Derived Native Grassland CEEC
- Western Slopes Dry Sclerophyll Forests (≥50% and <70% cleared)
- Upper Riverina Dry Sclerophyll Forests (<50% cleared)

The BSS contains substantial areas of White Box – Yellow Box – Blakely's Red Gum Grassy Woodland and Derived Native Grassland (Box Gum Woodland CEEC). Vegetation condition mapping indicates:

- 197.2 ha of intact Box Gum Woodland
- 142 ha of disturbed and modified Box Gum Woodland
- 200.9 ha of Box Gum Woodland Derived Native Grassland, which will be subject to Active Restoration Management Actions (ARMAs) to improve ecological condition.

The BSS also supports species credit potential for Yass Daisy and Southern Myotis.

Active management of the BSS will be undertaken in accordance with the Biodiversity Stewardship Agreement and will include:

- Weed control,
- Feral pest animal control,
- Active Restoration Management Actions (ARMAs) for Box Gum Woodland Derived Native Grassland,
- Fire management,
- Grazing management,
- Ongoing ecological monitoring, and
- Adaptive management to improve vegetation condition over time.

The site is predicted to generate approximately 3,208 ecosystem credits and 175,708 species credits, which will contribute to meeting offset obligations for the development.

The land proposed for the BSS is owned by Squadron Energy, and the Biodiversity Stewardship Agreement is currently in preparation, with establishment anticipated by August 2026.

Additional credits, where required, will be sourced from credits on the market in accordance with the NSW Biodiversity Offsets Scheme (BOS) within the region to support both offset delivery and broader regional biodiversity outcomes.

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7 Roles, Responsibilities and Training

7.1 Roles and Responsibilities

In accordance with Development Consent Condition B26, following receipt of the NSW Planning Secretary's approval, this BMP must be implemented for the Project Site. The roles and responsibilities for relevant personnel are provided in **Table 7.1**.

Table 7.1: Key Roles and Responsibilities

Role	Responsibility
SCWF Project Manager (responsibilities to be implemented for the life of the Project)	• Oversee the implementation of the BMP; • Ensure appropriate approvals and licences are held; • Have a working knowledge of the BMP; and • Implement the relevant responsibilities outlined in the EMS.
SCWF Project Environmental Advisor (responsibilities to be implemented for the life of the Project)	• Oversee the implementation of the BMP; • Oversee monitoring and reporting compliance with the BMP; • Inspection of clearing works to ensure that the BMP is being implemented; • Implement the relevant responsibilities outlined in the EMS.
Contractor Project Manager (responsibilities to be implemented during construction of the Project)	• Ensure resources are made available to enable works to comply with this; • Responsible for the implementation of this BMP; • Responsible for the induction of staff and contractors; • Ensure vehicles, mobile plant and personnel remain within the Final Development Footprint; • Responsible for appointing an appropriately qualified and experienced ecologist, in liaison with SCWF; • Maintain an induction register for all personnel on the Project Site; • Responsible for addressing corrective actions arising from environmental inspections; and • Implement the relevant responsibilities outlined in the EMS.
Contractor Environmental Advisor (responsibilities to be implemented during construction of the Project)	• Development and management of a cumulative vegetation clearing and disturbance register; • Develop and implement a VDP procedure for the Project Site; • Development of weekly monitoring report in accordance with **Section 8.1**; • Respond to unexpected threatened flora/fauna finds in accordance with **Section 6.4**; • Supervise works being undertaken in environmentally sensitive areas including demarcation of sensitive vegetation areas; • Implement management measures to allow material salvage where applicable; • Manage weed and pathogen spread throughout the Project Site; • Manage erosion and sedimentation impacts during construction; • Implement the biodiversity management monitoring framework; • Prepare and implement a Rehabilitation Management Program to the satisfaction of SCWF; • Ensure pre-clearance surveys are undertaken in accordance with this BMP; • Oversee vegetation removal;

Role	Responsibility
	• Ongoing monitoring of retained vegetation and threatened species; and • Implement the relevant responsibilities outlined in the EMS.

7.2 Training, Competence and Awareness

7.2.1 Site Inductions

All site personnel will be required to undergo a site-specific induction, to be developed and administered by the Contractor. The induction will include:

- An introduction to the Development Consent requirements and the contractor's obligations under this BMP;
- The location of the Development Consent and this BMP;
- Awareness training for sensitive biodiversity issues and relevant impacts;
- An overview of the management measures detailed in this BMP;
- A clear communication of roles and responsibilities under this BMP, including any stop-work situations, incident, non-conformances and notification requirements; and
- The detail and location of other plans relevant to this BMP (e.g. BBAMP).

An induction register will be maintained by the Contractor, including the name, date, and confirmation of completion of induction of all personnel.

7.2.2 Toolbox Talks

Toolbox talks will be provided to personnel with a key role in biodiversity management, particularly to highlight the relevant management measures required to be implemented in accordance with this BMP.

8 Monitoring, Reporting and Corrective Actions

The monitoring and reporting framework provides assurance that the measures described in this BMP are being implemented effectively, and that associated biodiversity impacts are avoided, minimised and mitigated. Where they are not, a relevant response and/or corrective actions will be applied. The Contractor is responsible for monitoring, reporting and implementation of corrective actions.

8.1 Cumulative Vegetation Clearing and Disturbance Register

SCWF will be responsible for developing a cumulative vegetation clearing and disturbance register which will be implemented by all Contractors responsible for vegetation clearing. This register will provide for the progressive tracking and recording of both planned/forecasted and actual vegetation clearing and disturbance throughout pre-construction and construction phases of the development. This will ensure that both planned and actual clearing is kept to within the approved clearing limits, and below the calculated offsetting requirements for each PCT and threatened fauna species polygon (refer **Section 6.10**).

The cumulative vegetation clearing and disturbance register will be progressively updated by Contractors and provided to SCWF within a weekly Environmental Monitoring Report, as described below. Updates to the register will be informed by:

- Changes to the Final Development Footprint during the detailed design and micro-siting process (refer **Section 6.1.1** and **Section 6.1.2** respectively);
- Ground survey and GIS-based calculations of planned and actual clearing/disturbance for each work area; and
- Comparison of the proposed area with clearing limits for PCT's and species polygons, as described in **Section 5**.

8.2 Inspections

During pre-construction and construction, daily inspection of work areas will include the following components, as applicable during active works:

- VDPs;
- Disturbance boundary and habitat feature demarcation;
- Pre-clearance surveys;
- Tree-felling;
- Habitat feature salvage;
- Protection of remnant vegetation;
- Open pits and trenches for fauna;
- Hygiene procedures and documented weed and seed inspections;
- Material and vehicle movement; certifications;
- Bush fire and other hazards;
- Dust; and

Fortnightly inspections will be conducted during construction for:

- Vegetation clearing activities and habitat salvage / placement;
- Waste management areas;
- Stockpiles (may be reduced to monthly if not actively disturbed);
- Areas susceptible to weeds;
- Erosion and sedimentation (including following rain events);
- Rehabilitation areas (during active works, e.g. surface preparation, seeding); and
- Security lighting.

8.3 Auditing

Auditing of the implementation of this BMP will be carried out in accordance with the auditing procedure outlined in the EMS.

8.4 Annual Compliance Reporting

In accordance with Condition 33 of the EPBC Approval, SCWF must prepare an Annual Compliance Report for each Annual Compliance Report period (i.e. each subsequent 12 month period from 4 March 2025). The Annual Compliance Report will include the following:

- Accurate and complete details of compliance and any non-compliance with:
  - Each condition imposed under the Development Consent, if a condition attached to the EPBC Approval decision requires compliance with that Development Consent condition;
  - Each condition attached to the EPBC Approval; and
  - All commitments made within this BMP.
- A schedule of all plans in effect in relation to these conditions during the Annual Compliance Report period;
- Accurate and complete details of how each plan was implemented during the Annual Compliance Report period; and
- If any incident occurred, accurate and complete details of each incident.

The Annual Compliance Report will be prepared in accordance with the *Annual Compliance Report Guidelines* (Commonwealth of Australia, 2023) and will be published to the Project website within 20 business days following the end of each Annual Compliance Reporting period. Each published Annual Compliance Report will remain on the Project website until the expiry date of the EPBC Approval.

Sensitive biodiversity data may be redacted from the publicly issued version of the Annual Compliance Report, in accordance with the requirements of EPBC Approval Condition 37.

8.5 Management Triggers and Corrective Actions

The biodiversity management monitoring framework is presented in **Table 8.1**, and will be implemented by the Contractor Environmental Advisor during construction and the SCWF Project Environmental Advisor during operations. For each biodiversity component and relevant management measures, monitoring methods include an indication of frequency, relevant documents, duration and relevant parameters. Specific locations, timing and methodology will be developed further during the detailed design process.

Following construction, requirements for further monitoring/reporting on rehabilitation, erosion and weeds at a suitable frequency will be determined based on outcomes during construction, in consultation with relevant agencies. In the event that the performance measures as detailed in **Table 8.1** are not met, corrective actions will be developed by the Contractor Environmental Advisor.

Table 8.1: Biodiversity Management Monitoring Framework

Topic	Impact Mitigation Measure	Monitoring Method	Timing/Frequency	Reporting Output	Responsibility	Performance Criteria	Corrective Action
Minimising native vegetation disturbance	Detailed design to quantify overall predicted impacts to vegetation. **Section 6.1.1**	Desktop / GIS review of detailed design against native vegetation and threatened species habitat mapping to calculate area of clearing and ensure the approved clearing limits (refer to **Section 5.1**) are not exceeded.	During each design change and prior to completion of clearing event.	Detailed design with impact calculations.	Contractor in consultation with SCWF Project Manager.	Zero exceedances of the vegetation clearing limits specified in the approval documentation (refer to **Section 5.1**).	Immediate hold-point on all scheduled clearing works for PCT/s which are at risk of having clearing limits exceeded. Review mapping to determine cause and review the construction/clearing method and alignment of the Development Footprint within the Development Corridor to identify methods to reduce required clearing.
		Desktop / GIS review of each new work area and completed area of clearing against native vegetation and threatened species habitat mapping to calculate area of clearing.	On completion of each clearing event.	Cumulative vegetation clearing register.	Contractor.	Zero exceedances of the vegetation clearing limits specified for each work area.	Immediate hold-point on all scheduled clearing works for PCT/s which have exceeded approved clearing limits. Review future planned clearing areas to identify methods to reduce future clearing. Review the contractor clearing procedures and identify strengthened restrictions and monitoring processes to prevent any excess clearing beyond the predicted amounts. If, at completion of all clearing, the total approved clearing limit has been exceeded, report the exceedance to DPHI/AG DCCEEW in accordance with the timeframes specified in respective approvals.
	Micro-siting of infrastructure **Section 6.1.2**	Desktop review of 3D model of topography, tree height and cut and fill at each WTG location to calculate the distance between the tree canopy of each hollow-bearing tree and the tip of the WTG blade.	During each micro-siting event.	Micro-siting reports, mapping.	SCWF Project Manager in consultation with the Contractor.	Zero exceedances of the micro-siting requirements specified by Development Consent Condition A8.	If proposed micro-siting design is non-compliant with Development Consent Condition A8, review mapping to determine cause and revise WTG location so that micro-siting complies with relevant requirements.
	Identification of clearance boundaries **Section 6.1.4**	Vegetation Disturbance Permit Pre-clearing procedure Daily environmental inspections	Prior to commencement of clearing at each new work area. Daily during active clearing. At completion of clearing.	Completed Vegetation Disturbance Permit. Weekly environmental inspection reports.	Contractor.	No vegetation clearing occurs outside of Final Development Footprint. Zero exceedances of the vegetation clearing limits specified for each work area	Immediate hold-point on clearing works if clearing is observed to have occurred outside of Final Development Footprint and/or in exceedance of the approved clearing limits. Review future planned clearing areas to identify methods to reduce future clearing. Review the contractor clearing procedures and identify strengthened restrictions and monitoring processes to prevent any excess clearing beyond the predicted amounts. If, at completion of all clearing, the total approved clearing limit has been exceeded, report the exceedance to DPHI/AG DCCEEW in accordance with the timeframes specified in respective approvals.
	Pre-clearing procedure **Section 6.1.5**	Vegetation Disturbance Permit Pre-clearing procedure Daily environmental inspections	Prior to commencement of clearing at each new work area.	Pre-clearing inspection report/records.	Contractor.	All items identified in the pre-clearing survey (i.e. habitat features) have appropriate management planning for vegetation clearing and are communicated effectively to relevant personnel.	If the Vegetation Disturbance Permit does not provide suitable management measures for items identified during the pre-clearance surveys, consult with a suitably qualified and experienced ecologist to ensure relevant controls and management measures are defined in the Vegetation Disturbance Permit prior to commencement of clearing.
	Vegetation clearing procedure	Vegetation Disturbance Permit Daily environmental	During clearing activities.	Completed Vegetation Disturbance Permit.	Contractor.	All vegetation clearing works completed in accordance with Vegetation Disturbance Permit.	In the event clearing of vegetation is not undertaken in accordance with Vegetation Disturbance Permit, consult with suitably qualified and experienced ecologist to

Topic	Impact Mitigation Measure	Monitoring Method	Timing/Frequency	Reporting Output	Responsibility	Performance Criteria	Corrective Action
	Section 6.1.5	inspections		Weekly environmental inspection reports.			determine if impact to threatened species or ecological community has occurred. If deemed to be a non-compliance with relevant approvals, report to DPHI/AG DCCEEW in accordance with timeframes specified in respective approvals.
	Fauna active management protocols **Section 6.3**	Vegetation Disturbance Permit Fortnightly environmental inspections	During clearing activities.	Completed Vegetation Disturbance Permit. Weekly environmental inspection reports.	Contractor.	Active management protocols are implemented for fauna identified as being at risk of impact by the Project.	In the event initial protocols are not effective, implement further controls as soon as possible to mitigate risk of fauna impacts. Consult with suitably qualified and experienced ecologist as required.
	Unexpected threatened species finds **Section 6.4**	Vegetation Disturbance Permit	During clearing activities.	Completed Vegetation Disturbance Permit. Weekly environmental inspection reports.	Contractor in consultation with the SCWF Project Manager.	Zero impacts to unexpected threatened species finds without appropriate approvals in place.	In the event an impact to an unexpected threatened species is suspected to have occurred, consult with suitably qualified and experienced ecologist to determine if impact has occurred. If the event is identified by a suitably qualified and experienced ecologists, communication with SCWF Project Manager is required on the same day. If deemed to be a non-compliance with relevant approvals, report to DPHI/AG DCCEEW in accordance with timeframes specified in respective approvals.
Minimising loss of key fauna habitat, including tree hollows	As per ‘minimising native vegetation disturbance’ above.						
	Minimising loss of hollow-bearing trees **Section 6.1.3**	Vegetation Disturbance Permit Pre-clearing procedure Daily environmental inspections	Prior to commencement of clearing at each new work area.	Pre-clearing inspection report/ records.	Contractor.	All hollow-bearing trees identified in pre-clearance checks are managed by relevant controls in accordance with this BMP and the Vegetation Disturbance Permit.	In the event hollow-bearing trees are impacted without appropriate controls being implemented, consult with suitably qualified and experienced ecologist to determine if impact has occurred. If deemed to be a non-compliance with relevant approvals, report to DPHI/AG DCCEEW in accordance with timeframes specified in respective approvals.
Maximising salvage of resources within the approved disturbance area for beneficial reuse	Salvage of biological resources during disturbance activities in accordance with **Section 6.1.6** of this BMP.	Monitoring for salvageable resources during active vegetation clearing.	Prior to commencement of clearing at each new work area. Daily during active clearing. At completion of clearing.	Completed Vegetation Disturbance Permit. Pre-clearing inspection report/records Weekly environmental inspection reports.	Contractor.	All biological resources identified for salvage during pre-clearance surveys have been salvaged.	Investigate opportunities for additional salvages in adjacent clearing areas to ensure adequate biological resources are available for placement in rehabilitation.
	Salvage and stockpiling of top/subsoil for later use in rehabilitation. **Section 6.9.1**	Soil stockpiles will be monitored to ensure soil resources are stabilised until such time as they can be reused.	Fortnightly during environmental inspections.	Weekly environmental inspection reports.	Contractor.	Soil stockpiles are constructed as per requirements of **Section 6.9.1**	Stockpiles to be stabilised and/or reconfigured to meet the relevant requirements (placement, height etc.) within two weeks of observation.

Topic	Impact Mitigation Measure	Monitoring Method	Timing/Frequency	Reporting Output	Responsibility	Performance Criteria	Corrective Action
Protecting native vegetation and key fauna habitat outside approved disturbance areas	As per 'minimising vegetation disturbance' above.						
	Project vehicles to remain within the Final Development Footprint **Section 6.2**	Induction records Daily environmental inspections	Daily during environmental inspections.	Weekly environmental inspection reports.	Contractor.	Zero disturbance to vegetation and habitat outside of the Final Development Footprint.	Review demarcation of boundaries to ensure the Final Development Footprint is adequately demarcated. Correct any shortcomings as soon as possible following observation.
	Laydown and temporary disturbance areas in already disturbed areas where practicable and feasible. **Section 6.2**	Detailed design Daily environmental inspections	Daily during environmental inspections.	Weekly environmental inspection reports.	Contractor.	Disturbance areas are minimised where practicable and feasible.	Review detailed design planning and maximize opportunities for location of laydown/temporary disturbance areas within already disturbed areas.
Minimising impacts on fauna	As per 'minimising vegetation disturbance' above.						
	Glossy black-cockatoo pre-clearance surveys during breeding season (March to August) **Section 6.1.5**	Vegetation Disturbance Permit Pre-clearing procedure Daily environmental inspections	72 hours prior to clearing of any area of glossy black-cockatoo habitat during breeding season of March to August.	Completed Vegetation Disturbance Permit. Weekly environmental inspection reports.	Contractor.	No clearing within identified glossy black-cockatoo habitat during the breeding season of March to August without a species-specific pre-clearance survey being completed.	In the event clearing within identified glossy black-cockatoo habitat during the breeding season of March to August occurs without the relevant pre-clearance survey being implemented, consult with suitably qualified and experienced ecologist to determine if impact has occurred. If deemed to be a non-compliance with relevant approvals, report to AG DCCEEW in accordance with timeframes specified in EPBC Approval.
	Trenches / pits shall be managed to minimise ingress of fauna and allow egress of fauna from the trench / pit. **Section 6.3**	Daily environmental inspections Visual inspection of trench / pit	Twice daily whilst excavation remains open.	Weekly environmental inspection reports.	Contractor.	Zero fauna injuries/deaths caused by entrapment in trenches/pits.	Increase frequency of trench/pit inspections and implement additional egress features. Increase awareness for construction staff (i.e. pre-start talks etc.) regarding inspection and notification requirements
	Vehicle speed limits within construction areas will be reduced to minimise fauna strike risk. **Section 6.3**	Visual monitoring by all personnel.	Daily.	Reporting of non-conformances only.	Contractor.	Zero fauna injuries/deaths caused by vehicles within construction areas.	Increase awareness for construction staff (i.e. pre-start talks etc.) and consider reducing speed limits and/or increasing signposting.
Minimising the potential indirect impacts on threatened fauna and flora species, including migratory species and 'at-risk' species	As per 'minimising native vegetation disturbance' above. As per 'Controlling erosion' below. As per 'Controlling weeds and feral pests' below.						
	Management of construction hours to minimise light spill to surrounding habitats. **Section 6.8**	Monitoring of adherence to standard construction hours. Visual monitoring by all personnel.	Fortnightly.	Weekly environmental inspection reports.	Contractor.	Use of artificial lighting outside of daylight hours (with the exception of security/safety lighting) near existing/remnant habitat areas is avoided.	Remove any unnecessary lighting outside of daylight hours where safe/practicable to do so.
	Management of dust-generation during	Visual monitoring of dust suppression use and effectiveness by all personnel.	Daily.	Weekly environmental inspection	Contractor.	Visible dust is actively managed e.g. use of water carts.	Reduce intensity of works during weather conditions conducive to excessive dust generation.

Topic	Impact Mitigation Measure	Monitoring Method	Timing/Frequency	Reporting Output	Responsibility	Performance Criteria	Corrective Action
	construction e.g. use of water carts. **Section 6.8**			reports.			
Controlling weeds and feral pests	Whole-of-site weed surveys will be undertaken by suitably qualified contractor. **Section 6.5.1**	Methods at discretion of suitably qualified contractor but may include survey plots and transect assessments.	Pre-construction to establish baseline conditions. Annually during construction with additional monitoring to be scheduled in consideration of the results.	Weed dilapidation survey reports.	Contractor.	Weed surveys have been completed to inform required weed management actions.	Implement weed surveys for areas which have not previously been surveyed to determine weed management actions.
	Implementation of weed management actions where weed incursion or spread is identified. **Section 6.5.1**	Visual monitoring of areas subject to any weed management actions to monitor success.	Fortnightly environmental inspections. Monthly inspections of treated areas which are not within active works areas.	Weekly environmental inspection reports. Weed control records.	Contractor.	High threat weed spread does not increase as a result of the Project relative to results of pre-construction surveys.	Consult with the suitably qualified contractor to implement additional weed management controls.
	Soil disturbance will be managed to minimise the spread of weeds. **Section 6.5.1**	Visual inspections of active work areas and soil stockpiles.	Fortnightly during environmental inspections	Weekly environmental inspection reports.	Contractor.	Soil stockpiles to be free of weed growth.	Consult with the suitably qualified contractor to implement additional weed management controls.
	Waste is managed to reduce opportunities for scavenging pest animals. **Section 6.5.2**	Visual monitoring and inspections in accordance with the Contractor's Construction Environmental Management Plan.	Fortnightly during environmental inspections.	Weekly environmental inspection report.	Contractor.	All bins are covered and in good working condition to mitigate risk of scavenging pest species.	Increase awareness for construction staff (i.e. pre-start talks etc.) and consider increasing placement of bins.
Controlling erosion	Develop and implement an Erosion and Sediment Control Plan, in accordance with the requirements of Managing Urban Stormwater: Soils and Construction (Landcom, 2004). **Section 6.7.1**	Visual monitoring of ESCP implementation during environmental inspections and ESCP effectiveness during post-rainfall inspections.	Weekly environmental inspections. Immediately following rainfall/high wind.	Weekly environmental inspection reports.	Contractor.	Erosion is controlled in accordance with ESCPs and does not lead to impacts to biodiversity values.	Corrective actions to be implemented in accordance with the ESCPs and Project Soil and Water Management Plan.
Rehabilitating and revegetating temporary disturbance areas	Implementation of Rehabilitation Management Program which addresses the management measures identified in **Section 6.9** of this BMP.	Fortnightly inspections of rehabilitated areas to monitor for: • drainage conditions (i.e. no ponding or scouring); • weeds; • areas of instability that require stabilisation or remediation; • signs of erosion; • whether revegetated areas are growing as expected; and • requirements for follow up rehabilitation activities including any weed control, reseeding, vertebrate pest control and watering as required.	Fortnightly during active works. Monthly until rehabilitated areas have achieved a minimum coverage / stabilisation criteria (to be set in the Rehabilitation Management Program).	Weekly environmental inspection reports. Rehabilitation monitoring reporting to be set in the Rehabilitation Management Program.	Contractor.	Rehabilitation Management Program is prepared prior to commencement of rehabilitation. Performance/completion criteria to be set in the Rehabilitation Management Program.	Corrective actions to be identified and administered by the Contractor on an as needed basis.

Topic	Impact Mitigation Measure	Monitoring Method	Timing/Frequency	Reporting Output	Responsibility	Performance Criteria	Corrective Action
		A photographic register will be utilised to record groundcover conditions at the commencement of rehabilitation to monitor progress over time.					

9 Incident and Non-Compliance Management

9.1 Incident Notification and Reporting

9.1.1 Development Consent

Under the Development Consent, an 'incident' is defined as:

> "*an occurrence or set of circumstances that causes or threatens to cause material harm to the environment, and as a consequence of that environmental harm, may cause harm to the health and safety of human beings, and which may or may not be or cause a non-compliance*."
>
> Where 'material harm' is defined as:
>
> *"involves actual harm to the environment that may include (but not be limited to) a leak, spill, emission, other escape or deposit of a substance, and as a consequence of that environmental harm (pollution), may cause harm to the health or safety of people; or*
>
> *results in actual loss or property damage of an amount, or amounts in aggregate, exceeding $10,000 (such loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment."*

Within 24 hours of becoming aware of an incident, SCWF will provide a written notification via the Major Project website. This notification will address details of the incident as required by Development Consent Condition C10.

Within seven days of making the initial incident notification, SCWF will provide DPHI with a subsequent incident report in accordance with the requirements of Condition C11 and Appendix 8 of the Development Consent.

9.1.2 EPBC Approval

Under the EPBC Approval, an incident is defined as:

> "*any event which has the potential to, or does, harm any protected matter, other than as authorised by this approval".*

Where a 'protected matter' is defined as:

> "*a matter protected under a controlling provision in Part 3 of the EPBC Act for which this approval has effect."*

SCWF will notify AG DCCEEW within one business day of becoming aware of any incident in accordance with the requirements listed in Condition 39 of the EPBC Approval.

Within seven business days of making the initial incident notification, SCWF will provide AG DCCEEW with a subsequent incident report in accordance with the requirements of Condition 40 of the EPBC Approval.

9.1.3 Incidents affecting Dapper Nature Reserve

SCWF will notify NPWS Mudgee Area (6370 9000 or npws.mudgee@environment.nsw.gov.au) within one business day of becoming aware of an incident that directly or indirectly affects the Dapper Nature Reserve.

In the event of an emergency, SCWF will notify the NPWS Blue Mountains Branch Duty Officer (8275 17478 or npwsbmb.dutyofficer@environment.nsw.gov.au).

9.2 Non-Compliance Notification and Reporting

Under the Development Consent, a non-compliance is defined as:

> "*an 'occurrence, set of circumstances or development that is a breach of the consent but is not an incident.'*"

SCWF will notify DPHI in writing via the Major Projects NSW Planning Portal website within seven days after becoming aware of any non-compliance, in accordance with Development Consent Condition C12. Any non-compliance notification will identify the development Project and the application number, set out the condition of consent that the development Project is non-compliant with, why it does not comply, the way in which it does not comply and the reasons for the non-compliance (if known), and. The notification will also identify what actions have been undertaken, or will be undertaken, and when, to address the non-compliance.

Under the Development Consent, a non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.

10 Review and Revision

10.1 Triggers for Review and Revision

In accordance with Development Consent Condition C2, the BMP will be reviewed (and updated if necessary), within 3 months, unless the Planning Secretary agrees otherwise, of:

- The submission of an incident report under condition C10;
- The submission of an audit report under condition C14; or
- The approval of any modification to the conditions of this consent.

Additional triggers for review and revision of this BMP include:

- Substantial changes in Project scope and design;
- At completion of Stage 1 (prior to the commencement of Stage 2) of this BMP;
- Upon direction from AG DCCEEW to include specific management measures within this BMP, in accordance with EPBC Condition 8; and
- As directed by the SCWF Project Manager and/or relevant agencies.

10.2 Matters to be Considered During BMP Review

Review and revision of this BMP will consider:

- Environmental monitoring reports;
- Any reported non-compliances or incidents; and
- Opportunities for improvement of:
  - mitigation/management measures, Biodiversity Impact Avoidance, Mitigation and Management;
  - monitoring methods and appropriate triggers;
  - initial response and corrective actions; and
  - relevant roles, responsibilities and training.

10.3 Distribution and Publication of Revised BMP

In accordance with the procedure described in the EMS, a copy of the updated BMP and changes will be distributed to all relevant stakeholders. Changes will also be communicated to relevant site personnel via relevant stakeholder consultation structures, site inductions and toolbox talks.

Once the revised BMP has been approved, and in accordance with the Development Consent Condition C15, the revised BMP will be published and made publicly available on the SCWF website: https://www.squadronenergy.com/our-projects/spicers-creek-wind-farm. In accordance with EPBC Approval Condition 22, this will occur within 15 business days of the revised BMP being approved.

In accordance with EPBC Approval Condition 9, SCWF must also notify AG DCCEEW at the same time as submitting any request to have a revised version of the BMP approved by the NSW Planning Secretary if those revisions are relevant to protected matters. If a revised version of the BMP is approved by the NSW Planning Secretary, SCWF must provide AG DCCEEW with the approved revised BMP within five business days of its approval and specify what changes have been made from the previous approved version, and any implications of the changes for EPBC Act listed bird species.

SCWF must implement the most recent version of the BMP approved by the NSW Planning Secretary, to the extent that it applies to the protection of protected matters until the expiry of the EPBC Approval.

11 References

Commonwealth of Australia (2023) *Annual Compliance Report Guidelines.*

Bureau of Meteorology (BOM) (2024) *Climate Statistics for Australian Locations – Monthly Climate Statistics - Gulgong Post Office Site no. 062013* http://www.bom.gov.au/climate/averages/tables/cw_062013.shtml.

Department of Environment and Climate Change (2008) *Managing Urban Stormwater – Soils and Construction Volume 2C Unsealed Roads*, NSW Department of Environment and Climate Change.

Department of Planning and Environment (2022) *Threatened reptiles Biodiversity Assessment Method survey guide*, NSW Department of Planning and Environment.

Department of Planning Industry and Environment (2020) *Saving our Species - Hygiene Guidelines – Protocols to protect priority biodiversity areas in NSW from Phytophthora cinnamomic, myrtle rust, amphibian chytrid fungus and invasive plants*, NSW Department of Planning, Industry and Environment.

NSW Local Land Services (2018) *Central West Regional Strategic Pest Animal Management Plan*, New South Wales Local Land Services.

NSW Local Land Services (2022) *Central West Regional Strategic Weed Management Plan*, New South Wales Local Land Services.

NSW Rural Fire Service (2019) *Planning for Bush Fire Protection 2019*.

Standards Australia Limited (2009) *Australian Standard AS4970 Protection of Trees,* Standards Australia Limited, Sydney.

Umwelt (2023a) *Biodiversity Development Assessment Report – Spicers Creek Wind Farm*

Umwelt (2023b) *Amended Biodiversity Development Assessment Report – Spicers Creek Wind Farm*

Umwelt (2024) *Amended Biodiversity Development Assessment Report Addendum, Revised Final – Spicers Creek Wind Farm*

Squadron Energy (2025) *Spicers Creek Wind Farm Bird and Bat Adaptive Management Plan.*

Squadron Energy (2025) *Spicers Creek Wind Farm Emergency Plan.*

Squadron Energy (2025) *Spicers Creek Wind Farm Environmental Management Strategy.*

Appendix A Consultation Register

Our ref: DOC25/618826
Your ref: SSD 41134610

Bill Wallach
Umwelt
National Biodiversity Renewables Lead
bwallach@umwelt.com.au

Dear Bill

Spicers Creek Wind Farm – Draft Biodiversity Management Plan (SSD 41134610)

Thank you for your request via the NSW Major Projects Planning Portal dated 4 July 2025 to the Conservation Programs, Heritage and Regulation Group (CPHR), of the NSW Department of Climate Change, Energy, the Environment and Water (NSW DCCEEW) inviting comments on the Draft Biodiversity Management Plan (BMP) for Spicers Creek Wind Farm.

We understand that Condition B26 of the Spicers Creek Wind Farm consent requires preparation of a BMP in consultation with CPHR. Our advice aims to assist the proponent to adequately address the requirements of approval Condition B26, prior to formal submission.

The draft BMP does not contain quantitative completion or performance criteria to establish satisfactory progress of actions, or a Trigger Action Response Plan (TARP) that identifies where actions have failed to meet performance criteria.

We note that the draft BMP provides limited detail on Condition B26(c)(iii) which requires that the proponent minimise the impacts to Box Gum Woodland Critically Endangered Ecological Communities (CEEC) through a Biodiversity Stewardship Agreement (BSA). We recommend that the BMP be updated to include further details on the proposed measures for addressing this Condition.

Our recommendations relating to the draft BMP are summarised in **Attachment A,** with supporting advice provided in **Attachment B.**

If you have any questions about this advice, please do not hesitate to contact Michelle Howarth, Senior Conservation Planning Officer, via michelle.howarth@environment.nsw.gov.au or (02) 6885 5339.

Yours sincerely,

Candice Larkin
A/Senior Team Leader Planning, North West
Conservation Programs, Heritage and Regulation Group

30 July 2025

CPHR's recommendations

Spicers Creek Wind Farm – Biodiversity Management Plan

Recommendations

1.1 Revise the BMP to include targets and triggers that are quantitative, unambiguous and relate to performance or completion criteria for all management activities.

1.2 Ensure all performance criteria, completion criteria and indicators:

- meet the 'SMART' principles.
- are drafted with consideration of current baseline conditions.
- are supported by suitable monitoring methods.

2.1 Include a description of the management measures that would be implemented for each of the specific matters listed in approval condition B26 within the BMP. The BMP should be a stand-alone document which can be read without additional documents.

3.1 Include the pre-clearance survey procedure in the BMP, ensuring any additional mitigation measures proposed for glossy black-cockatoo and barking owl are incorporated.

4.1 Where active nests are identified, postpone removal of habitat trees until birds have fledged.

5.1 Exposed trenches should be checked for trapped fauna at least twice a day (morning and afternoon/evening) at a minimum.

6.1 Ensure any operational impacts for the glossy black-cockatoo and barking owl which have not been addressed in the BMP are addressed within the BBAMP.

Attachment B

CPHR's detailed comments

Spicers Creek Wind Farm – Biodiversity Management Plan

1. The BMP must include quantitative performance measures and targets, completion criteria, monitoring and trigger points for corrective action.

The Biodiversity Management Plan (BMP) does not contain quantitative completion or performance criteria to establish satisfactory progress of actions, or a Trigger Action Response Plan (TARP) to identify where actions have failed to meet performance criteria.

Section 8.3 of the BMP states:

> *'Auditing of the implementation of the BMP will be carried out in accordance with the auditing procedure outlined in the EMS'.*

For auditing to be possible, the BMP must include quantitative criteria and indicators.

Section 8.5 of the BMP states *'In the event that the performance measures as detailed in Table 8.1 are not met, corrective actions will be developed by the Contractor Environmental Advisor'.* It is not sufficient to suggest that the triggers will be developed if required. The BMP should be revised to include a TARP with clear management triggers and corrective actions.

CPHR provides the following standard advice to proponents in relation to performance criteria, completion criteria and performance indicators for BMPs:

- Performance/completion criteria:
    - **Performance criteria** are the standards against which performance is to be measured. They are intended to express the standard/target to be achieved during the applicable planning period. The standards/targets should be set using baseline data where possible. Performance is then measured in terms of progress towards the specified standard/target. Sometimes it is also appropriate to set annual targets for some management measures within a planning period, depending on the specific circumstances.
    - **Completion criteria** should express the ultimate target, for instance at the end of a specific stage of the project and the end of life of the project. Where a specific matter is only relevant to the initial timeframe of the BMP, it is appropriate to equate performance criteria with completion criteria.
    - As far as possible, performance and completion criteria should relate to actual on-ground outcomes/states (e.g. reduction of 'pest species x' abundance to a specified acceptable threat level), rather than the implementation of a specific management measure.
- **Performance indicators** identify how achievement of performance criteria or targets will be measured. Performance indicators/measures should be quantitative (e.g. number/percentage decline in the abundance of 'pest species x' in each management domain).

CPHR strongly encourages proponents to ensure that all performance/completion criteria, and indicators also conform to the **'SMART'** principles (specific, measurable, achievable, realistic, time-bound). Monitoring methods should be suitably targeted to the performance indicators and able to measure progress towards the performance criteria, completion criteria and triggers for corrective action.

CPHR recommends that the BMP should be amended to include targets and triggers that are quantitative, unambiguous and relate to performance or completion criteria for all measures outlined in Table 8.1.

Recommendations

1.1 Revise the BMP to include targets and triggers that are quantitative, unambiguous and relate to performance or completion criteria for all management activities.

1.2 Ensure all performance criteria, completion criteria and indicators:

- meet the 'SMART' principles.
- are drafted with consideration of current baseline conditions.
- are supported by suitable monitoring methods.

2. Sufficient detail should be included in the BMP so the management measures required by approval condition B26 can be implemented.

The BMP outsources management actions by reference to other documents such as the 'Bird and Bat Adaptive Management Plan' and 'Soil and Water Management Plan' which have not yet been prepared.

Condition B26 of the approval states that the BMP must include a description of the measures that would be implemented for each of the specific matters related to the conservation of biodiversity values at the development site.

Section 6.5.2 of the BMP also states:

> *'Additional pest control is implemented with the intention of reducing prey for predatory birds that are vulnerable to blade strike, this is documented in the BBAMP'*.

All pest management activities must be included in the BMP. The BMP should contain quantitative performance measures and targets, completion criteria, monitoring and trigger points for corrective action, as detailed in issue one above, for each of the specific matters listed in the approval condition B26.

Recommendation

2.1. Include a description of the management measures that would be implemented for each of the specific matters listed in approval condition B26 within the BMP. The BMP should be a stand-alone document which can be read without additional documents.

3. Pre-clearance survey protocols should be included in the BMP.

Section 6.1.5 under *'Pre-clearance Survey'* states that *'a vegetation pre-clearance survey procedure will be developed by the Contractor prior to commencement of the vegetation clearing'.* The pre-clearance survey procedure should be prepared as part of the BMP and incorporate the additional mitigation measures proposed for glossy black-cockatoo and barking owl.

Recommendations

3.1. Include the pre-clearance survey procedure in the BMP, ensuring any additional mitigation measures proposed for glossy black-cockatoo and barking owl are incorporated.

4. Active bird nests should not be removed.

In section 6.1.5 under *'Nesting Birds'*, the draft BMP states:

> *'Where a nest is active, the birds present (generally fledglings) will be collected where safe, and taken to a wildlife carer'.*

Where an active nest of a threatened species is identified, the nest must not be removed, and the removal of the habitat tree must be postponed until birds have fledged.

Furthermore, CPHR does not support the removal of any active nests. It is recommended that the removal of the habitat tree be postponed until birds have fledged for any active nest.

Recommendation

4.1. Where active nests are identified, postpone removal of habitat trees until birds have fledged.

5. The management of fauna along open trenches requires further consideration.

Table 8.1 of the BMP states that open trenches and pits will be inspected daily for trapped fauna. It is recommended that exposed trenches/pits be checked at least twice a day (i.e. morning and afternoon/evening) at a minimum.

Recommendation

5.1. Exposed trenches should be checked for trapped fauna at least twice a day (morning and afternoon/evening) at a minimum.

6. All impacts to the glossy black-cockatoo and barking owl during operation should be managed.

Consent Condition B26 (c) (iv), which states *'minimise the impacts of the development on threatened flora and fauna species within the disturbance footprint and its surrounds, including the pink-tailed legless lizard, glossy black cockatoo and barking owl'* is not limited to construction impacts.

It is noted that not all operational impacts to these species have been addressed in the BMP. CPHR acknowledges that the management actions and mitigation methods for a number of operational impacts, such as turbine collisions, are better placed in the BBAMP. We recommend that additional management and mitigation actions for the glossy black-cockatoo and barking owl be incorporated into the BBAMP.

Recommendation

6.1. Ensure any operational impacts for the glossy black-cockatoo and barking owl which have not been addressed in the BMP are addressed within the BBAMP.

From:	Fiona CHRISTIE
To:	Zeina Jokadar
Subject:	SSD SSD-41134610 Spicers Creek Wind Farm (EPBC 2022/09387) - Biodiversity Management Plan Consultation [SEC=OFFICIAL]
Date:	Monday, 1 September 2025 4:10:19 PM

OFFICIAL

Hi Zeina,

Thanks for chatting with me this afternoon and once again apologies for not seeing this in the system earlier and contacting you. As said, I have reached out to NSW and hopefully this item can be actioned in the NSW public portal soon.

Confirming that the department has considered the Spicers Creek Wind Farm (SSD 41134610) - Biodiversity Management Plan - 26 May 2025 and have no comments.

Please reach out if you require anything further.

Kind regards,
Fiona

Dr Fiona Christie
Assistant Director
Northern NSW Assessments
Environment Regulation Division | Environment Assessments NSW and ACT Branch
Ngunnawal Country, John Gorton Building, King Edward Terrace, Parkes ACT 2600 Australia
Department of Climate Change, Energy, the Environment and Water
P 0487 891 302 **E** fiona.christie@dcceew.gov.au

DCCEEW.gov.au | ABN 63 573 932 849

Acknowledgement of Country
Our department recognises the First Peoples of this nation and their ongoing connection to culture and country. We acknowledge Aboriginal and Torres Strait Islander Peoples as the Traditional Owners, Custodians and Lore Keepers of the world's oldest living culture and pay respects to their Elders past, present and emerging.

OFFICIAL

Our ref: DOC25/864753

Bill Wallach
National Biodiversity Renewables Lead
Umwelt Pty Ltd
bwallach@umwelt.com.au

Dear Bill

Spicers Creek Wind Farm – Biodiversity Management Plan

Thank you for your e-mail dated 15 September 2025 to the Conservation Programs, Heritage and Regulation Group (CPHR) of the NSW Department of Climate Change, Energy, the Environment and Water (NSW DCCEEW) inviting comments on the Biodiversity Management Plan for the Spicers Creek Wind Farm (SSD-41134610).

Most of the issues raised in our correspondence dated 30 July 2025 have been adequately addressed. Our recommendations relating to outstanding issues are summarised in **Attachment A,** with supporting advice provided in **Attachment B.** The numbering follows that used in our previous response.

If you have any questions about this advice, please do not hesitate to contact David Geering, Senior Conservation Planning Officer, via david.geering@dcceew.nsw.gov.au or (02) 6883 5335.

Yours sincerely

Candice Larkin
A/Senior Team Leader Planning, North West
Conservation Programs, Heritage and Regulation Group

14 October 2025

CPHR's recommendations
Spicers Creek Wind Farm – Biodiversity Management Plan

Matters addressed in revised BMP – no further action required

1.1 Revise the BMP to include targets and triggers that are quantitative, unambiguous and relate to performance or completion criteria for all management activities.

1.2 Ensure all performance criteria, completion criteria and indicators:

- meet the 'SMART' principles.
- are drafted with consideration of current baseline conditions.
- are supported by suitable monitoring methods.

2.1 Include a description of the management measures that would be implemented for each of the specific matters listed in approval condition B26 within the BMP. The BMP should be a stand-alone document which can be read without additional documents.

5.1 Exposed trenches should be checked for trapped fauna at least twice a day (morning and afternoon/evening) at a minimum.

Residual recommendations – action required

3.1 Reinstate the 200m buffer on any hollow-bearing tree that is confirmed or strongly believed to be actively used by barking owl for clearing during the breeding season.

4.1 Report all records of breeding threatened species found during pre-clearance surveys to CPHR.

4.2 No nest of a threatened species should be removed without prior consultation with CPHR.

4.3 The removal of the tree, and surrounding habitat, should be postponed until birds have fledged and can move out of the cleared area.

6.1 Ensure any operational impacts for the glossy black-cockatoo and barking owl which have not been addressed in the BMP are addressed within the BBAMP.

3. CPHR does not support the buffer distance for clearing around barking owl nest trees

Section 6.1.5 states "*the Project will minimise its impacts on barking owl by implementing the following additional* nesting *activity protocol. For any hollow bearing tree that is confirmed, or strongly believed to be actively used by barking owl, clearing must not occur during breeding season (July – November) within 100m of the identified hollow bearing tree*". CPHR notes that the previous version of the BMP had a buffer of 200m from nest trees.

Clearing activities 100m from an active nest would likely result in abandonment. The reaction of a breeding pair of barking owls to such activity at 200m will be dependent on the pair's tolerance to disturbance. However, given the largely fragmented nature of the wind farm site, this buffer is acceptable.

Recommendation:

3.1 Reinstate the 200m buffer on any hollow-bearing tree that is confirmed or strongly believed to be actively used by barking owl for clearing during the breeding season.

4. Active bird nests should not be removed

Section 6.1.5 of the BMP states that "*Where an active nest of a threatened species is identified, the nest must not be removed, and the removal of the habitat tree must be postponed until birds have fledged* " however this is caveated with the statement that "*if there are no hatched young (i.e. un- hatched eggs), and adult birds of the threatened species have aborted the nest, as determined by a suitably qualified ecologist, the habitat tree may be removed. Where possible and safe to do so, the un-hatched eggs will be collected and taken to a wildlife carer for rearing and later release*".

We recommend that all records of breeding threatened species found during pre-clearance surveys should be reported to CPHR. No nest of a threatened species should be removed without prior consultation with CPHR.

It is further suggested that "*Where a nest is active for a non-threatened species, the birds present (generally fledglings) will be collected where safe, and taken to a wildlife carer, prior to later release*". CPHR does not support the removal of any active nests. The removal of the tree, and surrounding habitat, should be postponed until birds have fledged and can move out of the cleared area.

Recommendations:

4.1 Report all records of breeding threatened species found during pre-clearance surveys to CPHR.

4.2 No nest of a threatened species should be removed without prior consultation with CPHR.

4.3 The removal of the tree, and surrounding habitat, should be postponed until birds have fledged and can move out of the cleared area.

6. Operational impacts to fauna which are not addressed in the BMP must be addressed in the BBAMP.

CPHR previously acknowledged that the management actions and mitigation methods for a number of operational impacts, such as turbine collisions, are better placed in the Bird and Bat Adaptive Management Plan (BBAMP). We welcome the opportunity to review the BBAMP.

Recommendation:

6.1 Ensure any operational impacts for the glossy black-cockatoo and barking owl which have not been addressed in the BMP are addressed within the BBAMP.

Your ref: SSD - 41134610
Our ref: DOC25/883074-2

Zeina Jokadar
Environmental Advisor - Operations
Squadron Energy

By email: zeina.jokadar@squadronenergy.com

Spicers Creek Wind Farm – Draft Biodiversity Management Plan

Thank you for referring the Spicers Creek Wind Farm Draft Biodiversity Management Plan SSD-41134610 (Version B), prepared by Squadron Energy, dated 10 September 2025 (DBMP). The NSW National Parks and Wildlife Service (NPWS) retains an interest in the overall management of biodiversity due to the development site's shared interface with Dapper Nature Reserve. NPWS appreciates this opportunity to provide comments on the draft BMP.

NPWS acknowledges that this consultation on the DBMP accords with Condition B26(a) of the State Significant Development SSD-41134610 Approval. We highlight that the nature reserve was gazetted under the NSW *National Parks and Wildlife Act 1974* (NPW Act) due to its natural values as outlined in the Dapper Nature Reserve Statement of Management Intent (OEH, 2014) https://www.environment.nsw.gov.au/publications/dapper-nature-reserve-statement-management-intent. NPWS has, by intent, restricted visitors to the nature reserve, with access primarily for conservation, specialist scientific research and specialised birdwatching groups.

On review of the DBMP, NPWS has considered the values of the nature reserve and the potential risks arising from the construction and operation of the wind farm, in providing the advice below. The advice centres on avoiding impacts and managing risks to the biodiversity values of the nature reserve.

NPWS recommends revising the DBMP to include as part of:

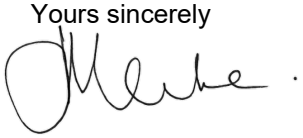
1. Section 6.1.1 Detailed design – as part of the detailed design process, additional clear actions to minimise impacts and risk of disturbance to Dapper Nature Reserve, by
    a. establishing the 200m buffer from the surveyed boundary of the nature reserve in accordance with Condition A8(e) of the Approval, excluding the final micrositing of all Wind Turbine Generators (WTGs) to the full buffer extent.
    b. ensuring ancillary facilities are established outside the 200m buffer from the surveyed boundary of the nature reserve, in line with the WTG buffer condition.
    c. considering the construction of new access tracks or upgrades to existing tracks proximate to, or on the interface with, the nature reserve in accordance with Condition B35 of the Approval and in considering impacts in accordance with Developments adjacent to National Parks and Wildlife Service lands (DPIE, 2020) via https://www.environment.nsw.gov.au/publications/developments-adjacent-national-parks-and-wildlife-service-lands
2. Section 6.1.4 Demarcation of Clearance Boundaries, subject to Condition B22 of the Approval, ensure the boundaries of the final development corridor and wind farm assets (WTG, auxiliary facility and internal access tracks) are to be digitally captured and displayed in the development's GIS database. Where proximate to the NPWS estate boundary, identify the nature reserve boundary relative to the development corridor and assets.
3. Section 6.1.6 Salvage of Habitat Features and Vegetative Materials – salvage and collection as an action in response to the clearing of native vegetation and site preparation for the WTG, ancillary

facilities and internal access tracks. Where the material may benefit biodiversity and habitat restoration outcomes, it will be utilised or moved to areas adjacent to the development corridor. Salvage may include habitat features such as tree hollows, scattered or fallen debris and boulders, with the collection of vegetative material (fruits and seeds) for use in propagation for site revegetation activities. Where the NPWS estate is considered for placement of salvaged materials or in the collection of plant material to facilitate rehabilitation activities, further environmental assessment and authorisation from the NPWS will be required.

4. Section 6.3 - Minimising Impacts on Native Fauna - where native fauna is deemed displaced or at risk of harm with relocation and release proposed, if the release is to occur on the nature reserve, the act must be authorised by NPWS and may require licencing under the *Biodiversity Conservation Act 2016*. Ensure this is addressed as part of the BMP.
5. Section 6.5.1 - Weeds and Pathogens – where active management remains a priority, particularly in proximity to Dapper Nature Reserve. The BMP should include as part of:
    a. pathogen actions, with the identified priority considerations around Phytophthora (*Phytophthora cinnamomi*), Myrtle rust (*Austropuccinia psidii*), and Chytrid fungus (*Batrachochytrium dendrobatidis*), baseline data is obtained, documented with set performance standards. This will support the annual quantitative survey as proposed for detecting the presence and extent of pathogens on the interface of the nature reserve. Provide methodology and targeted collection requirements, which will be completed by a qualified and experienced ecologist.
    b. weed actions, as part of the development site biosecurity requirements under the *Central West Regional Strategic Weed Management Plan 2023-2027* (Local Land Services, 2022). Provide or reference the baseline dataset and survey methodology to be applied to the proposed annual quantitative survey for the presence and extent of high-threat weeds, which will be completed by a qualified and experienced ecologist.
    c. management activities occurring proximate to, or on the interface of the nature reserve, can be coordinated with NPWS to ensure effective management of high-threat weeds and pathogen risks. Contact with the NPWS Mudgee Area is recommended.
6. Section 6.5.2 Vertebrate Pests – provide for the monitoring programs set for vertebrate pest threats within the development corridor, ensure consistency with the targeted priorities set out in the *Central West Regional Strategic Pest Animal Management Plan 2024-2028 (Local Land Services, 2024*), with management programs notified where proximate to, or where issues are detected on the interface of the nature reserve.
7. Section 6.8 Noise, Dust and Light - minimise lighting requirements and associated light spill impacts on the nature reserve, use the *National Light Pollution Guidelines for Wildlife (DCCEEW, 2023)* - https://www.dcceew.gov.au/environment/biodiversity/publications/national-light-pollution-guidelines-wildlife to assist in lighting design.
8. Section 9.1.1 Incident Notification and Reporting (Development consent) – in the notification of incidents affecting the nature reserve, should include NPWS Mudgee Area 6370 9000 or npws.mudgee@environment.nsw.gov.au and for emergency notifications, the NPWS Blue Mountains Branch Duty Officer 8275 17478 or npwsbmb.dutyofficer@environment.nsw.gov.au.

Access to the nature reserve for any purpose during construction or operation is subject to authorisation issued by NPWS as the park authority. If you have any questions, please contact me on 02 6370 9006 or at Lisa.Menke@dcceew.nsw.gov.au.

Yours sincerely



Lisa Menke
Manager, Mudgee Area
NSW National Parks and Wildlife Service

16 October 2025

NSW National Parks and Wildlife Service

Your ref: SSD - 41134610
Our ref: DOC26/84281

Zeina Jokadar
Environmental Advisor - Operations
Squadron Energy

By email: zeina.jokadar@squadronenergy.com

Spicers Creek Wind Farm – Biodiversity Management Plan

Thank you for referring Response to Submission Table on the proposed amendments to the Spicers Creek Wind Farm Biodiversity Management Plan, dated 20 October 2025, in response to matters raised by the agency in our letter of 16 October 2025 (Ref DOC25/883074-2)

The NSW National Parks and Wildlife Service (NPWS) retains an ongoing interest in the management of biodiversity for the project, due to the development site's shared interface with Dapper Nature Reserve as land reserved under the NSW *National Parks and Wildlife Act 1974.* NPWS appreciates this final opportunity to confirm the proposed amendments to the Biodiversity Management Plan, and we acknowledge that the consultation accords with Condition B26(a) of the State Significant Development SSD-41134610 Approval.

On review of the Table and the proposed amendments to the set actions in the Biodiversity Management Plan, NPWS agrees matters highlighted have been sufficiently addressed. These amendments both address and manage the highlighted and potential risks arising from the construction and operation of the project. NPWS has provided Attachment 1 to this letter as a breakdown of matters raised and NPWS's position on the response to aid Squadron Energy's discussion with the NSW Department of Planning, Housing and Infrastructure – Planning.

NPWS raises awareness that any access to the nature reserve for any purpose must be subject to authorisation issued by NPWS as the park authority. All communications regarding the nature reserve are to be directed to the NPWS Mudgee Area via email on npws.mudgee@environment.nsw.gov.au.

If you have any further questions on NPWS perspectives relating to the project, please contact me on 02 6370 9006 or via Lisa.Menke@dcceew.nsw.gov.au.

Yours sincerely

Lisa Menke
Manager, Mudgee Area
NSW National Parks and Wildlife Service

11 February 2026

Attachment 1 – NPWS comments on the amendments to the Spicers Creek Wind Farm – Biodiversity Management Plan

Ref	EIS Section	NPWS original recommendations	NPWS position on the matters addressed
1	6.1.1	Detailed design – as part of the detailed design process, additional clear actions to minimise impacts and risk of disturbance to Dapper Nature Reserve, by a. establishing the 200m buffer from the surveyed boundary of the nature reserve in accordance with Condition A8(e) of the Approval, excluding the final micrositing of all Wind Turbine Generators (WTGs) to the full buffer extent. b. ensuring ancillary facilities are established outside the 200m buffer from the surveyed boundary of the nature reserve, in line with the WTG buffer condition. c. considering the construction of new access tracks or upgrades to existing tracks proximate to, or on the interface with, the nature reserve in accordance with Condition B35 of the Approval and in considering impacts in accordance with Developments adjacent to National Parks and Wildlife Service lands (DPIE, 2020) via https://www.environment.nsw.gov.au/publications/developments-adjacent-national-parks-andwildlife- service-lands	**Agreed** – matters raised have been adequately addressed. NPWS highlights the use of Guidelines for Developments adjacent to National Parks and Wildlife Service lands (DPIE, 2020) via https://www.environment.nsw.gov.au/publications/developments-adjacent-national-parks-and-wildlife-service-lands as guidance in identifying risks to the NPWS estate around future operations.
2	6.1.4	Demarcation of Clearance Boundaries, subject to Condition B22 of the Approval, ensure the boundaries of the final development corridor and wind farm assets (WTG, auxiliary facility and internal access tracks) are to be digitally captured and displayed in the development's GIS database. Where proximate to the NPWS estate boundary, identify the nature reserve boundary relative to the development corridor and assets.	**Agreed** – matters raised have been adequately addressed.
3	6.1.6	Salvage of Habitat Features and Vegetative Materials – salvage and collection as an action in response to the clearing of native vegetation and site preparation for the WTG, ancillary facilities and internal access tracks. Where the material may benefit biodiversity and habitat restoration outcomes, it will be utilised or moved to areas adjacent to the development corridor. Salvage may include habitat features such as tree hollows, scattered or fallen debris and boulders, with the collection of vegetative material (fruits and seeds) for use in propagation for site revegetation activities. Where the NPWS estate is considered for placement of salvaged materials or in the collection of plant material to facilitate rehabilitation activities, further environmental assessment and authorisation from the NPWS will be required.	**Agreed** – matters raised have been adequately addressed. NPWS highlights that all communications are to be directed to NPWS Mudgee Area via npws.mudgee@environment.nsw.gov.au.
4	6.3	Minimising Impacts on Native Fauna - where native fauna is deemed displaced or at risk of harm with relocation and release proposed, if the release is to occur on the nature reserve, the act must be authorised by NPWS and may require licencing under the *Biodiversity Conservation Act 2016*. Ensure this is addressed as part of the BMP.	**Agreed** – matters raised have been adequately addressed.

Ref	EIS Section	NPWS original recommendations	NPWS position on the matters addressed
5	6.5.1	Weeds and Pathogens – where active management remains a priority, particularly in proximity to Dapper Nature Reserve. The BMP should include as part of: a. pathogen actions, with the identified priority considerations around Phytophthora (*Phytophthora cinnamomi*), Myrtle rust (*Austropuccinia psidii*), and Chytrid fungus (*Batrachochytrium dendrobatidis*), baseline data is obtained, documented with set performance standards. This will support the annual quantitative survey as proposed for detecting the presence and extent of pathogens on the interface of the nature reserve. Provide methodology and targeted collection requirements, which will be completed by a qualified and experienced ecologist. b. weed actions, as part of the development site biosecurity requirements under the *Central West Regional Strategic Weed Management Plan 2023-2027* (Local Land Services, 2022). Provide or reference the baseline dataset and survey methodology to be applied to the proposed annual quantitative survey for the presence and extent of high-threat weeds, which will be completed by a qualified and experienced ecologist. c. management activities occurring proximate to, or on the interface of the nature reserve, can be coordinated with NPWS to ensure effective management of high-threat weeds and pathogen risks. Contact with the NPWS Mudgee Area is recommended.	**Agreed** – matters raised have been considered and/or a reasonable explanation on its application has been provided. *Noted for:* • *points (a) and (b) that the methodology and data collection requirements for site-based pathogen and weed monitoring will be determined by an ecologist before development commences.* • *point (c) that coordination with NPWS is not necessary as the distance (or buffer provided) from the reserve interface is deemed sufficient to not create a shared management zone.* Notification on program delivery is requested by NPWS as per the vertebrate pest program.
6	6.5.2	Vertebrate Pests – provide for the monitoring programs set for vertebrate pest threats within the development corridor, ensure consistency with the targeted priorities set out in the *Central West Regional Strategic Pest Animal Management Plan 2024-2028 (Local Land Services, 2024*), with management programs notified where proximate to, or where issues are detected on the interface of the nature reserve.	**Agreed** – matters raised have been considered and a reasonable explanation provided. *Noted for that coordination with NPWS is not necessary as the distance (or buffer provided) from the reserve interface is deemed sufficient to not create a shared management zone. Agreed to notify NPWS when programs are initiated.*
7	6.8	Noise, Dust and Light - minimise lighting requirements and associated light spill impacts on the nature reserve, use the *National Light Pollution Guidelines for Wildlife (DCCEEW, 2023)* - https://www.dcceew.gov.au/environment/biodiversity/publications/national-light-pollution-guidelineswildlife to assist in lighting design.	**Agreed** – matters raised have been adequately addressed.
8	9.1.1	Section 9.1.1 Incident Notification and Reporting (Development consent) – in the notification of incidents affecting the nature reserve, should include NPWS Mudgee Area 6370 9000 or	**Agreed** – matters raised have been adequately addressed.

Ref	EIS Section	NPWS original recommendations	NPWS position on the matters addressed
		npws.mudgee@environment.nsw.gov.au and for emergency notifications, the NPWS Blue Mountains Branch Duty Officer 8275 17478 or npwsbmb.dutyofficer@environment.nsw.gov.au.	

Department of Climate Change, Energy, the Environment and Water

Our ref: DOC26/85684

Zeina Jokadar
Environmental Advisor - Operations
Squadron Energy
zeina.jokadar@squadronenergy.com

Dear Zeina

Spicers Creek Wind Farm – revised Biodiversity Management Plan

Thank you for your request via email to the Conservation Programs, Heritage and Regulation Group (CPHR) of the NSW Department of Climate Change, Energy, the Environment and Water (DCCEEW) inviting comments on the revised Biodiversity Management Plan (BMP) for the Spicers Creek Wind Farm (SSD-41134610).

Most of the issues raised in our previous correspondence (dated 30 July 2025 – DOC25/618826, and 14 October 2025 – DOC25/864753-1) have been adequately addressed.

CPHR's recommendations relating to outstanding issues are provided in **Attachment A**.

CPHR is aware that the development consent does not restrict vegetation clearing during the spring breeding season. However, we recommend that wherever possible, clearing be scheduled to occur outside the months of September to December. Protocols for clearing native vegetation should be clearly presented in the BMP.

If you have any questions about this advice, please do not hesitate to contact the Conservation Planning and Assessments team – North, at rog.nw@dcceew.nsw.gov.au.

Yours sincerely,

Kirsten McWhirter
A/ Senior Team Leader, Conservation Planning and Assessments - North
Conservation Programs, Heritage and Regulation Group

18 February 2026

Attachment A

CPHR has reviewed *Spicers Creek Wind Farm Biodiversity Management Plan, SSD-41134610 dated 21 October 2025, prepared by Squadron Energy* (the revised BMP)

The following issue numbers relate to those in CPHR previous advice dated 14 October 2025 (DOC25/864753-1).

Matters addressed in revised BMP

Issue 3.1

CPHR notes the constraints regarding applying a 200 m buffer around hollow-bearing trees that are confirmed, or strongly believed to be actively used, by a barking owl, and accept that a buffer of 100 m, while not ideal, is sufficient in this instance.

Matters not addressed in revised BMP

Issue 4.1

Table 3.1 of the revised BMP indicates that section 6.1.5 resolves CPHR's request to 'report all records of breeding threatened species found during pre-clearance surveys to CPHR'. CPHR has been unable to locate this assurance in the revised BMP.

Recommendation:

Include a commitment to report all records of breeding threatened species found during pre-clearance surveys to CPHR.

Issue 4.2

Table 3.1 of the revised BMP also indicates that issue 4.2 (relating to the removal of a nest of a threatened species without consultation with CPHR), has been resolved by comments added to section 6.1.5 'nesting birds'. The BMP clearly states that active nests of threatened birds must not be removed until the birds have fledged. The BMP should also ensure that trees within 100 m of active nests are not cleared; to minimise the possibility of the nest being abandoned.

It is further stated that should any unhatched eggs be present in a nest of threatened species that has apparently been abandoned by the parents, as determined by a suitably qualified ecologist, the habitat tree may be removed. The BMP still contains no requirement for consultation with CPHR prior to the removal of the habitat tree and nest.

Recommendation:

Update the BMP to resolve issue 4.2, including requiring adequate reporting to, and consultation with, CPHR.

Department of Climate Change, Energy, the Environment and Water

Our ref: DOC26/113743-3

Zeina Jokadar
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Dear Zeina

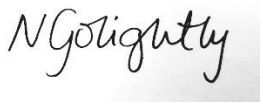
Spicers Creek Wind Farm – revised Biodiversity Management Plan

Thank you for your email request to the Conservation Programs, Heritage and Regulation Group (CPHR) of the NSW Department of Climate Change, Energy, the Environment and Water (DCCEEW) inviting comments on the revised Biodiversity Management Plan Version 002 (BMP) dated 18 February 2026 for the Spicers Creek Wind Farm (SSD-41134610).

CPHR is satisfied that the BMP addresses all of the concerns outlined in our advice of 18 February 2026 (DOC26/85684).

If you have any questions about this advice, please do not hesitate to contact the Conservation Planning and Assessments team – North, at rog.nw@dcceew.nsw.gov.au.

Yours sincerely,



Naomi Golightly
A/ Senior Team Leader, Conservation Planning and Assessments - North
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19 February 2026

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We develop, operate and own renewable energy assets in Australia, with 1.1 gigawatts (GW) of renewable energy in operation and a development pipeline of 20GW.

With proven experience and expertise across the project lifecycle, we work with local communities and our customers to lead the transition to Australia's clean energy future.

Squadron Energy acknowledges the Traditional Owners of Country throughout Australia. We pay our respects to Elders past, present, and emerging.

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