

13 June 2025

██████████
Assistant Director
Department of Climate Change, Energy, the Environment and Water (DCEEW)
John Gorton Building, King Edward Terrace
Parkes, ACT

SENT BY EMAIL

Dear ██████████,

Subject: EPBC 2020/8668 Valley of the Winds Wind Farm – Request to vary

ACEN Australia is requesting a variation to the proposed controlled action for the Valley of the Winds wind farm (the Project) which was provided by the Department on 13th July 2020. Following consultation with DCEEW in May 2025, ACEN requests a variation under section 156A of the EPBC Act to include an additional area and further refine and remove areas from the referred proposed action area.

The original proposal was (and remains) to construct, operate and maintain a wind farm with supporting infrastructure, including a high voltage transmission line, near Coolah, New South Wales.

Description and justification of changes to the proposed action

The proposed variation is to amend the footprint of the Project's proposed action area 'Project Area' which has occurred as a result of: detailed design review; community and agency consultation and feedback; avoidance of constraints where possible, eg avoiding and minimising impacts to biodiversity; and changes to the delivery of the main grid connection to the Project.

Since the controlled action decision in 2020, the following project changes have occurred:

1. Removal of 330kV overhead transmission line from the Leadville connection point and the Girragulang connection point to the Wollar switching station.
 - This will be delivered by EnergyCo/ACE-REZ as part of the Central West Orana Renewables Energy Zone transmission project and is subject to separate approvals.
 - Please note that the section of the 330kV transmission line which is internal to the Project and connects the Mount Hope and Girragulang Clusters remains.
2. Reduction in number of wind turbines from 175 to 131 including associated access tracks and turbine laydown areas.
3. Removal of 4 and relocation of 7 meteorological masts.
4. Amendments to access routes, including:
 - Removal of access to the Girragulang cluster via Uarbry township, with an alternative access ~3km west
 - Removal of light vehicle access from Coolah to the Mount Hope cluster via Neilrex Road
 - Removal of light vehicle access from Leadville to the Leadville cluster via the Leadville stock route and Warden's Rd
5. Inclusion of additional substation in the Mount Hope cluster following analysis of electrical design requirements.
6. Inclusion of upgrades to the Black Stump Way and Moorefield Rd

As a result of these changes the project area has reduced in size.

Please refer to Figure 1 which shows the referred project area and the varied project area.

Impacts to Matters of National Environmental Significance (MNES)

The Project was referred to the Commonwealth Minister for the Environment in 2020 and was declared a controlled action due to potential impacts primarily to Box Gum Woodland Critically Endangered Ecological Community (CEEC) (Referral 2020/8668). The referral identified potential impacts to two communities and 29 species listed under the EPBC Act. These species were derived from the project footprint identified in the original referral in 2020.

Since the original referral occurred, several key changes have taken place, which has changed the referral 'Project area' ('Study area' within the Biodiversity Development Assessment Report (BDAR)) from that initially assessed, the key one being the removal of the 330kV overhead transmission line from the Wind Farm to the Wollar switching station which has reduced the Development site of this Project and significantly reduced impacts associated with MNES as a result.

Two access options into the Girragulang Road cluster were considered as part of the original state assessment. In late 2024, the 'Girragulang Road cluster Alternative Access' was determined to be the most suitable and the access option originally assessed in the BDAR (2023) 'Girragulang Road cluster via Moorfield Road' through Uarbry was removed from the project and all areas (ha) and credits related to this option have been removed from any assessment and are not considered further in the BDAR (2025). This is discussed further in the BDAR (2025) Section 1.1. Please note that light vehicle access remains on Moorefield Rd West, west of the cluster.

The Development site has also been significantly truncated and reduced through a number of design iterations since 2020, as part of the avoid and minimise requirements of the Biodiversity Offset Scheme (BOS) and in accordance with the Biodiversity Assessment Method (BAM). This included the removal of a number of turbine locations identified as comprising significant vegetation or their proximity to mapped caves and clifflines.

A recent inclusion to the Project assessment included the impacts associated with road upgrades along Black Stump Way and Moorefield Road west to support the Project.

All Project impacts to MNES relevant to (Referral 2020/8668) have been updated and addressed as part of the Project. Those MNES impacted are outlined in Table 1 and can be found in Figure 2.

The required impact assessment for all species and communities listed as MNES are included within the finalised BDAR (2025) Section 11.3. A number of species were assumed present for the portion of the project comprising upgrades to Black Stump Way and Moorefield Road. Further discussion of mitigation measures and offsets for impacts to MNES are addressed below.

Table 1 Impacts to MNES

MNES	Quantum	Consequence
Grey Box (<i>Eucalyptus microcarpa</i>) Grassy Woodlands and Derived Native Grasslands of South-eastern Australia	0.67 ha of woodland removed. 4.04 ha of derived grasslands impacted.	No significant residual impact considered likely.

White Box-Yellow Box-Blakely's Red Gum Grassy Woodland and Derived Native Grassland	36.10 ha of woodland removed.	No significant residual impact considered likely.
Regent Honeyeater (<i>Anthochaera phrygia</i>)	Removal of 2.17 ha of potential foraging habitat.	Removal of a minor amount of potential habitat. No significant residual impact considered likely.
Swift Parrot (<i>Lathamus discolor</i>)	Removal of 2.17 ha of potential foraging habitat.	Removal of a minor amount of potential habitat. No significant residual impact considered likely.
Superb Parrot (<i>Polytelis swainsonii</i>)*	Removal of 2.17 ha of potential foraging habitat.	Removal of a minor amount of potential habitat. No significant residual impact considered likely.
Eastern Cave Bat (<i>Vespadelus troughtoni</i>)*	Removal of 2.36 ha of foraging habitat. No impacts to breeding habitat.	No significant residual impact considered likely.
Large-eared Pied Bat (<i>Chalinolobus dwyeri</i>)^	Removal of 58.91 ha of foraging habitat. No impacts to breeding habitat. "Low" risk rating of wind turbine strike.	No significant residual impact considered likely.
Koala (<i>Phascolarctos cinerus</i>)*	Removal of 2.17 ha of potential habitat. No impacts to breeding habitat.	Removal of a minor amount of potential habitat. No significant residual impact considered likely.
White-throated Needletail (<i>Hirundapus caudacutus</i>)	Removal of native vegetation which may promote invertebrate activity and act as foraging habitat. No impacts to breeding habitat. "Negligible" risk rating of wind turbine strike.	No significant residual impact considered likely.
Pink-tailed Legless Lizard (<i>Aprasia parapulchella</i>)*	Removal of 2.90 ha of potential habitat. No impacts to breeding habitat.	Removal of a minor amount of potential habitat. No significant residual impact considered likely.
Gang-gang Cockatoo (<i>Callocephalon fimbriatum</i>)*	Removal of 1.21 ha of foraging habitat.	Removal of a minor amount of potential foraging habitat. No significant residual impact considered likely.
Grey-headed Flying-fox (<i>Pteropus poliocephalus</i>)	Removal of 2.17 ha of potential foraging habitat.	Removal of a minor amount of potential foraging habitat. No significant residual impact considered likely.

^ portion of impacted area assumed presence

* Assumed presence (Black Stump Way and Moorefield Road)

Mitigation measures and offsets for impacts to MNES

Over several design iterations, the Development site has been reduced by approximately 44% from 1,318 ha to 735 ha. Significant areas of the development site no longer comprise native plant communities due to historical agricultural activities, with paddocks representing over 71% of the Development site.

Impacts associated with the Black Stump Way and Moorefield Road upgrades are considered minor and small scale, within the majority of impacts associated with disturbed roadside edges.

Efforts to avoid and minimise impacts to biodiversity were also implemented along the proposed access road upgrades for Black Stump Way and Moorefield Road, where 81% of this area is confined to exotic grassland roadsides. 12% of the impact area associated with road upgrades is located within areas where the native vegetation or threatened species habitat is in the poorest condition. The remaining 7% occurs within degraded roadside remnant vegetation, and where possible, impacts to a number of hollow-bearing trees has been avoided to minimise impacts to vegetation and associated habitat for MNES.

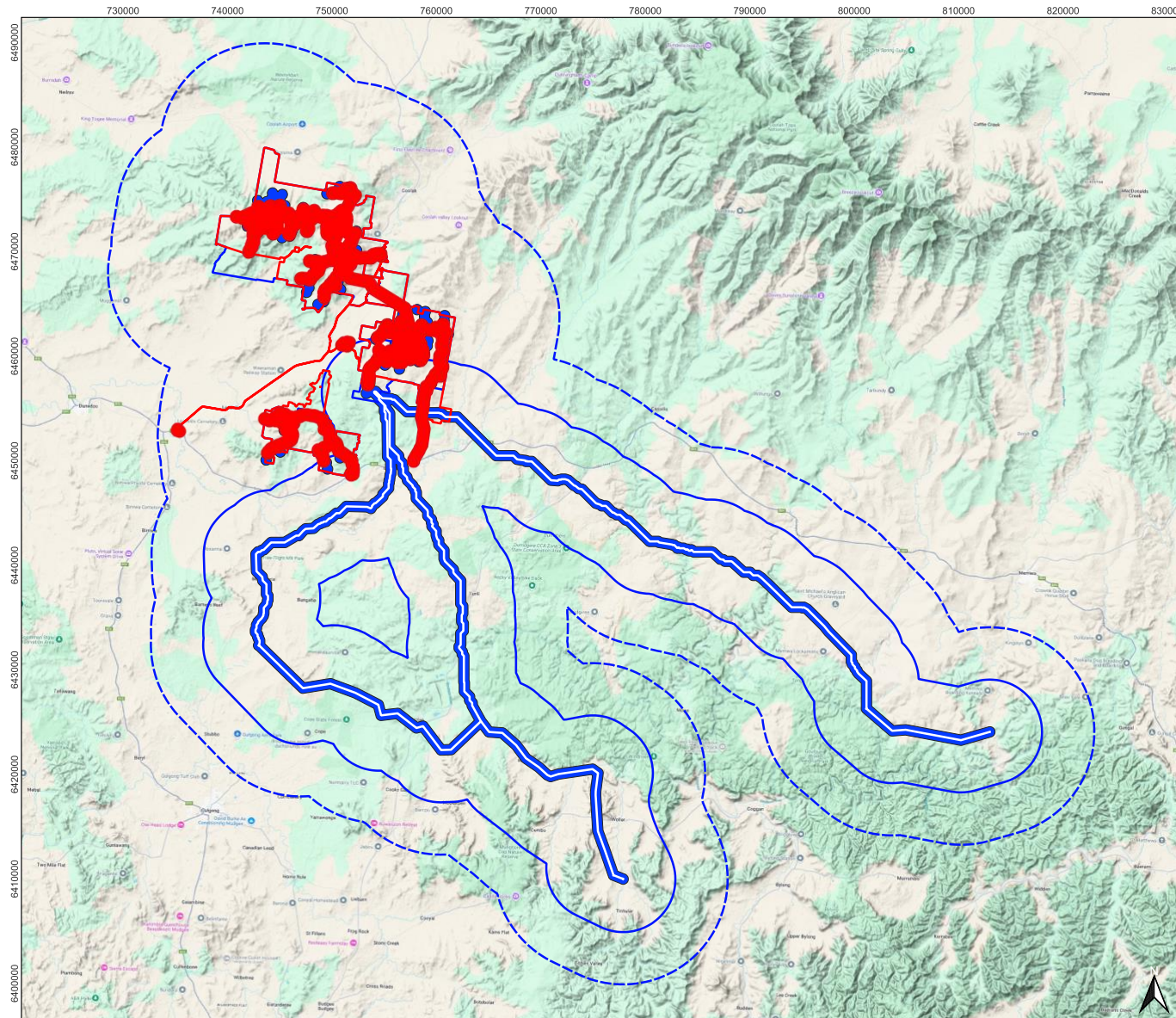
The resulting impacts to MNES listed in Table 2 and presented in Figure 2 below have generated a credit requirement under the BC Act, as per the Biodiversity Offset Scheme based on impacts for the Project.

Table 2 Impacts to MNES that require offsets

MNES	Quantum	Offset generated under BC Act
Grey Box (<i>Eucalyptus microcarpa</i>) Grassy Woodlands and Derived Native Grasslands of South-eastern Australia	0.67 ha of woodland removed 4.04 ha of derived grasslands impacted	Yes, offsets generated for the area of impact associated with BC Act listed EEC Yes - 77 credits
White Box-Yellow Box-Blakely's Red Gum Grassy Woodland and Derived Native Grassland	36.10 ha of woodland removed	Yes, offsets generated for the area of impact associated with BC Act listed CEEC Yes – 748 credits
Eastern Cave Bat (<i>Vespadelus troughtoni</i>)*	Removal of 2.36 ha of foraging habitat. No impacts to breeding habitat.	Yes – 23 credits
Large-eared Pied Bat (<i>Chalinolobus dwyeri</i>)^	Removal of 58.91 ha of foraging habitat. No impacts to breeding habitat.	Yes – 1,452 credits
Superb Parrot (<i>Polytelis swainsonii</i>)*	Removal of 2.17 ha of foraging habitat.	Yes – 63 credits
Koala (<i>Phascolarctos cinerus</i>)*	Removal of 2.17 ha of potential habitat. No impacts to breeding habitat.	Yes – 63 credits
Pink-tailed Legless Lizard (<i>Aprasia parapulchella</i>)*	Removal of 2.90 ha of potential habitat. No impacts to breeding habitat.	Yes – 32 credits
Gang-gang Cockatoo (<i>Callocephalon fimbriatum</i>)*	Removal of 1.21 ha of foraging habitat.	Yes – 34 credits

^ portion of impacted area assumed presence

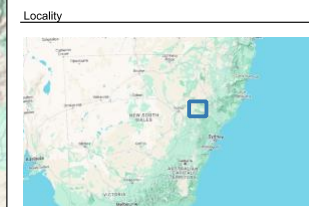
* Assumed presence (Black Stump Way and Moorefield Road)



- Legend**
- Original EPBC Application Area
 - Current Project Area

Notes

1. Project features shown are preliminary and subject to change.



Project

Valley of the Winds
Renewable Energy from ACEN

Title

**Valley Of The Winds
EPBC Areas**

Date
30/05/2025

0 10000 20000 m

1:330001 GDA2020 / MGA zone 55

Figure 1: Referred and Current Project Area

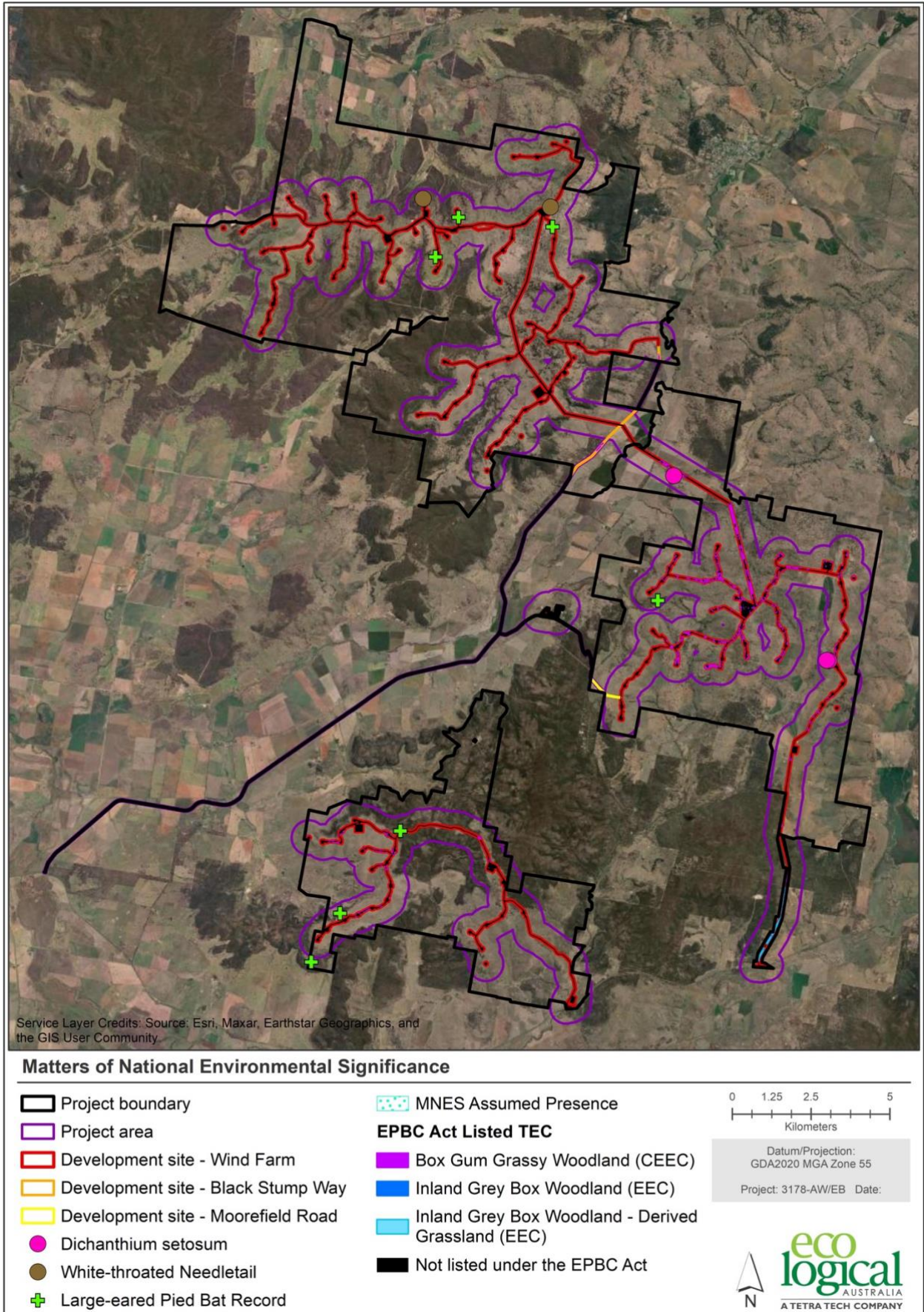
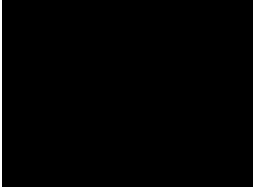


Figure 2: MNES identified in the Project area

Please let me know if you require any further information or would like to discuss.

Yours sincerely



Project Developer
ACEN Australia