

**Submission:** Chalumbin wind farm proposal

**Date:** 9 January 2023

**Confidential treatment:** has not been requested

**Summary:** The Chalumbin Wind Farm project establishes a damaging precedent by placing renewable energy projects in secondary and primary regrowth ecosystems. Renewable energy projects should not depend on the clearing of existing vegetation.

**Supporting documents: Request to be heard:** No

## Chalumbin Wind Farm Proposal

### About The Waterways Network (TWN)

The Waterways Network is a community practice that considers how flows, rivulets, creeks, streams, and rivers form a connected network across the landscape of Australia that is fundamental to the health of our environment. The ecological integrity of the landscape is indispensable to the health of the world in which we live, and water is the critical ingredient in that integrity. The TWN is committed to understanding water as landscape flows in an Australia-wide context in all its variability and through the similarities and differences between basins, climatic zones, and jurisdictions.

### Submission points

1 The TWN acknowledge the need for renewable energy, but projects need to be in the right place given the large footprint of renewable energy projects, whether wind or solar.

2 Installation and maintenance of wind turbines require extensive road access. The biggest cause of loss of biodiversity is the fragmentation of habitat. Road networks are a major cause of the fragmentation of habitat.

3 Roads are vectors for feral and weed species.

4 Offsets have not delivered on the promise of a net gain for biodiversity. The TWN supports Ark Energy's use of a significant net gain principle to guarantee a positive and successful outcome. Still, the TWN is unconvinced that this net gain will be delivered, given past failures with offsets.

5 Erosion and sedimentation are significant issues for landscapes and coastal waters across Australia. The TWN does not consider that in this zone with rainfall of 4 metres or more, Ark Energy has sufficiently demonstrated an ability to eliminate the potential damage from the project.

6 The project does not respect the necessary 5 km for the breeding of brolgas and sarus cranes. This lack of respect for essential breeding buffers reinforces a precedent in Western Victoria where transmission lines and turbine locations are within 5 km of nesting sites. Although the birds may be present and even nesting, the wind farm infrastructure prevents the young's successful breeding and maturation. Any turbines or infrastructure should not be located within 5km of breeding sites.

7 It is inappropriate as a matter of process for these submissions to be submitted through the developer of the project. That is a failure of governance.

8 The project needs to be considered in the context of other proposed wind farms in the area and the cumulative impact of the projects collectively

9 Installation of the wind turbines and the ongoing maintenance will damage water flows over the landscape and waterways.