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Amanda Vonarx
Land and Planning Manager
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25/04/2023

Dear Amanda,

**Re: Native Vegetation Impact Assessment: Glenrowan Terminal Station at 17 Glenwest Lane
Winton 3673**

AusNet Services (AusNet) have identified the required removal of native vegetation within the road reserve adjacent to the above listed address to enable the safe operation of proposed electricity infrastructure. DM Ecological has conducted this Native Vegetation Removal assessment to support an application for the native vegetation removal in accordance with the *Guidelines for the removal, destruction or lopping of native vegetation* (DELWP, 2017) herein referred to as 'the Guidelines'.

Two trees located within a 30m buffer zone associated with a new transformer are required to be removed from the adjacent Glenwest Lane road reserve. The trees proposed for removal are both large (>70cm diameter at breast height – DBH) White Box (*Eucalyptus albens*) trees. These were assessed previously by Nature Advisory (Glenrowan Solar Farm Cable Flora and Fauna Assessment, February 2022) as part of the Glenrowan Solar Farm Connection Works. In the report, they are identified as tree numbers 151 & 153. At that time the trees were identified as to be retained and as such, were not included in any planning permit for the Connection works or associated native vegetation offsets.

Construction of the solar farm is now well advanced and these trees have been retained to this point in accordance with the existing Planning Permit PA2101420 and the Flora and Fauna Assessment (Nature Advisory 2022). They were retained with some minor pruning to allow heavy machinery access. Pruning was less than 1/3 overall canopy cover and in line with AS4970-2009 *Pruning of amenity trees* (Figure 1). No offsets were required for the minor pruning works performed.

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Figure 1: Trees 151 & 153 retained with minor pruning, taken from Glenwest Lane looking south-east. (Photo by DM Ecological (August 2022).

Planning Permit PA2101420 relates to the construction of the works and installation of the transformer and associated connection works. To enable the safe operation of the transformer and based on updated design specifications, AusNet have identified the requirement for these two additional trees to be removed. Specifically, there is a requirement to install a 30m blast radius around the transformer and associated bund (Attachment A). This is because in the event of a pool fire (where the transformer may spill its oil), the oil (or the ignition for the flames) can be anywhere within the bund, and thus separation distances have been extended from the bund, rather than the transformer. The requirement comes from *Australian Standard 2067:2016 Substations and High Voltage Installation*.

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The project has investigated engineered controls (i.e. fire walls) to enable the retention of the trees however they were not feasible at the site and, vegetation removal is required to enable the safe operation of the 220kV transformer.

AusNet have consulted with Benalla Rural City Council (Attachment C) as the Local Government Authority and the relevant road authority for Glenwest Lane. Benalla Rural City Council have no objection to the removal of the two trees, per comms, J. Ingham 15/09/2022:

“The approach for the tree removal application below is appropriate. At this stage we have no objection to the proposal and will leave any decision on this to the DELWP environmental department”.

Under the Guidelines, native vegetation requires to be offset. To provide context to the native vegetation requiring removal (Trees 151 and 153) the following information should be considered:

- The trees are within the Central Victorian Upland (CVU) Bioregion;
- The relevant Ecological Vegetation Class (EVC) within the CVU bioregion is EVC 235 Plains Woodland/Herb-rich Gilgai Wetland Mosaic;
- Trees 151 and 153 both have diameters at breast height (DBH) exceeding 70cm, which is the large tree size for *Eucalyptus spp.* according to the EVC 235 benchmark;
- Both trees are White Box (*Eucalyptus albens*) which is not a character species listed in the EVC 235 benchmark;
- *Eucalyptus albens* is not listed as character species in any EVC benchmark within the CVU Bioregion; and
- Although they are not a character species of the relevant benchmark or Bioregion, both trees are defined as native vegetation per the definition in Clause 72 of the Victorian Planning Provisions, ‘plants that are indigenous to Victoria, including trees, shrubs, herbs and grasses’.

In preparing the permit application, the removal of the two trees would have been assessed via the intermediate pathway under the Guidelines, but to account for potential cumulative impacts to biodiversity, the two trees were added to the Project’s initial Native Vegetation Removal (NVR) Report, in accordance with the detailed pathway assessment under the Guidelines. Further, any ramifications under the following relevant legislation were also considered:

- Environment Protection and Biodiversity Conservation Act 1999 (Commonwealth) (EPBC Act);
- Flora and Fauna Guarantee Act 1988 (FFG Act);
- Catchment and Land Protection Act 1994;
- Environment Effects Act 1978;
- Wildlife Act 1975;
- Aboriginal Heritage Act 2006;
- Heritage Act 2017;
- Planning and Environment Act 1987

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The above legislation had all been considered previously in the obtaining of relevant approvals to facilitate construction. This included a an EPBC Act referral (referral number 2021/9103) which determined the level of impact by the project on several Matters of National Environmental

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Significance (MNES). A decision on this referral was made on 03/03/2022 and determined that approval was not required. The original MNES impact assessment along with updates including the removal of trees 151 & 153 proposed here is provided in Table 1.

Table 1: Assessment of potential impacts of proposed tree removal of MNES.

MNES	Original assessment of impacts (per 2021/9103)	Additional impacts associated with removal of trees 151 & 153.	Determination of significant impact or referral requirement.
Grey Box (<i>Eucalyptus microcarpa</i>) Grassy Woodlands and Derived Native Grasslands of South-Eastern Australia	The proposed action will not compromise the condition or future survival of the retained part of the patch of this community and therefore the proposed action will not result in a significant impact on the community.	Trees to be removed are not within area identified as the MNES community. See Figure 3a Matters of National Environmental Significance Assessment for Glenrowan Solar Farm and Cable (Nature Advisory 2021).	The removal of trees 151 & 153 will not result in any additional impacts to the MNES community. No further referral or approval required.
Painted Honeyeater	Since there are no records from the referral site itself and no Critical Habitat identified, it is unlikely the referral proposal would adversely affect any habitat critical for the species.	There are still no records of the species in the study area. No mistletoe is present on trees 151 or 153. Their removal is unlikely to have any additional impacts to the species than had been previously determined.	No further referral or approval required.
Regent Honeyeater	The limited area of likely habitat for Regent Honeyeater affected, and the relatively small average tree size give the removed trees in the roadside habitat patch very low potential for being Critical Habitat for Regent Honeyeater. Given this, it is unlikely that the project will affect habitat critical for the survival of the species. would be adversely affected. There are no records of Regent Honeyeater from the referral area, and the extent of suitable breeding habitat is small. Therefore, any impact on the to the breeding cycle of Regent	There are still no records of the species in the study area. Given the extent of existing fragmentation in the referral area and the limited area of removal (two trees within a patch that is otherwise retained) there is unlikely to be any additional impacts to the species than had been previously determined.	No further referral or approval required.

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MNES	Original assessment of impacts (per 2021/9103)	Additional impacts associated with removal of trees 151 & 153.	Determination of significant impact or referral requirement.
	Honeyeater is unconfirmed and unlikely to be significant.		
Swift Parrot	The project is expected to result in the removal of a limited number of trees that is unlikely to reduce significantly the availability or quality of habitat for Swift Parrot. It is expected that the Swift Parrot population would not decline as a result and that the affected area would remain suitable for the species should it shoes to pass through it. the habitat is very small in extent and unlikely to contain large numbers of high nectar-yield eucalypts which as mostly large tree.	Trees 151 & 153 are large trees however have not been identified as hollow bearing in previous assessments and no hollows were observed on site. Per the referral, it's possible Swift Parrot could visit the referral area from time to time however the removal of these two trees is not likely to affect presence, particularly when the far more suitable habitat in the nearby Warby Ranges remains more attractive.	No further referral or approval required.

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Based on the detailed assessments previously undertaken (Nature Advisory, 2021 & 2022), EPBC referral 2021/9103, its determination of no required approval and the recent site assessments by DM Ecological, it is unlikely there will be significant impact to MNES will occur as a result of the removal of these two additional trees. AusNet have been able to avoid and minimise impacts to these trees through construction to date, however it appears there are no alternatives to removal to enable the safe operation the 220kV transformer, particularly in regard to the requirements of AS2067:2016 *Substations and High Voltage Installation*.

Removal of the trees is understood to be is required by May 2022 to enable the commissioning and operation of the transformer and connection to the Glenrowan Solar Farm.If you have any questions or require further information, please don't hesitate to contact me.

Kind regards,



Dylan McWhinney | BEnvSci, CEnvP, MEIANZ

Principal Ecologist



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Attachments:

- A. Tree Removal Plan
- B. Correspondence with Benalla Rural City Council
- C. Native Vegetation Removal Report
- D. Quotation to Supply Offsets
- E. Glenrowan Solar Farm Cable Flora and Fauna Assessment (Nature Advisory, February 2022)

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