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Mr Michael Lennon
State Planning Commission

Comments on the Renewable Energy Consultation

Wombat Awareness Organisation (WAO) is a not for profit organisation specialising in the rescue, rehabilitation and advocacy of the Southern Hairy-nosed Wombat (SHNW). WAO is committed to improve the understanding and knowledge about the welfare and management of the species in South Australia and runs the largest and only free-range wombat sanctuary in Australia.

We operate a 24-hour rescue service and provides community education and coexistence strategies for SA Power Networks, Visionstream, Mid Murray Council and over 80 small business owners have contracted us for assistance.

WAO has concerns regarding the lack of protective policy for the Southern Hairy-nosed Wombats (SHNW) historically inhabiting grassland sites proposed for wind farms and solar farms in the Regional Council of Goyder, Light Regional Council and Mid Murray Council Areas of South Australia.

While supporting the development of Renewable Energy Facilities in this state, WAO's position is that some renewable energy facilities should not be supported or envisaged in certain sites containing important grassland habitat and resident populations of SHNW identified by DEW mapping and reports.

Wombats are shy territorial animals with extensive burrow networks. We have measured some SHNW burrows which extend up to 200m horizontally under the ground.

Adverse impacts arise for the SHNW from wind farms and solar farms include noise and vibration, shadow flicker, land disturbance, road kill, crushed in burrows collapsed by heavy vehicle traffic, excavation activities, burrow destruction, physical disturbance, construction activities, and damage to foraging grounds, feed quality (dust) and vegetation, soil erosion, interruption of movement corridors and disturbance from EMR.

Construction, existence and maintenance of Electricity infrastructure associated with both wind farms and solar farms including substations, transmission towers, maintenance tracks and underground powerlines also provide direct impacts for the species.

Negative impacts also arise for the energy facility developer/operator via tracks and heavy vehicles collapsing into underground burrows, burrowing damage to the integrity of infrastructure sites, foundations, fences and underground cables.

Trials of the removal and relocation of onsite animals to locations outside of our sanctuary

have been unsuccessful due to the territorial nature of the species. Wombats are solely reliant on the protection of their burrows for survival against elemental exposure. Already established burrows are inhabited by other wombats and relocated wombats are pushed out and new burrows are only created by young wombats.

Removal of wombats and the disruption of the social hierarchy creates space for other wombats to move in.

We are concerned particularly for the population in the Northern Mount Lofty Ranges which DEW acknowledges is the only wild population in the Adelaide and Mount Lofty Ranges NRM area. WAO has also been consulted by industry regarding SHNW in the vicinity of the proposed expansion of the Robertstown substation.

I have serious concerns regarding the lack of ecological surveys, inaccurate population estimation, the inaccurate mapping of current burrow systems and lack of responsibility to the wombats in the recent DA to develop the Twin Creek wind farm amongst the existing significant native grasslands at Hansborough and Bagot Well.

Mapping of burrows is simple and assisted by available satellite imagery (Nature Maps, Google Earth & AgInsite websites) which clearly define burrows within the vicinity of RES Australia's proposed construction. DEW mapping.

Predesign surveys should have signalled to the Developer, DEW, NVC and DPTI that this was not an appropriate site for a wind farm.

Should the wind farm proceed to construction, adjacent areas of grassland might also be targeted for further wind farm stages.

In conclusion, the Renewable Energy policy should be amended to include the following:

1. Areas of significant areas of native grassland providing habitat to resident fauna assets such as the Southern Hairy-nosed Wombat and Pygmy Blue Tongue Lizard as identified by DEW mapping should be excluded as sites for the development of wind farms and solar farms. Eg Northern Mount Lofty Ranges between Truro and Robertstown.
2. Detailed Mapping and consultant DA reports,, Construction Management Plans and ongoing management and monitoring plans will be publicly available and audited. Conditions of consent for wind farms and solar farms in significant biodiversity habitat will be enforced by DEW.
3. Referral Agency responses from DEW and NVC will provide “direction” on project refusals or amendments, consent conditions and compliance with consent conditions (upgraded from “regard” or advice”)

I would like to extend the opportunity for WAO to work with DEW and DPTI to develop further policy to protect and enhance the Southern Hairy-nosed Wombat populations in the Northern Mount Lofty Ranges.

Kindest Regards,

Brigitte Stevens
Wombat Awareness Organisation