Barn Hill Wind Farm

SEB Investigations Report

Final

September 2026

umwelt

Barn Hill Wind Farm

SEB Investigations Report

Final

Prepared by
Umwelt (Australia) Pty Limited

[redacted]

[redacted]

1/112 Hayward Avenue, Torrensville SA 5031

This report was prepared using
Umwelt's ISO 9001 certified
Quality Management System.

Acknowledgement of Country



Disclaimer

This document has been prepared for the sole use of the authorised recipient and this document may not be used, copied or reproduced in whole or part for any purpose other than that for which it was supplied by Umwelt (Australia) Pty Ltd (Umwelt). No other party should rely on this document without the prior written consent of Umwelt.

Umwelt undertakes no duty, nor accepts any responsibility, to any third party who may rely upon or use this document. Umwelt assumes no liability to a third party for any inaccuracies in or omissions to that information. Where this document indicates that information has been provided by third parties, Umwelt has made no independent verification of this information except as expressly stated.

©Umwelt (Australia) Pty Ltd

Document Status

Rev No.	Reviewer Name	Date	Approved for Issue Name	Date
Final	Angela Carpenter	21/09/2026	Dr Travis How	24/09/2026

Abbreviations

Abbreviation	Definition
AGL	AGL Energy Limited
BAM	Bushland Assessment Method
CT	Certificate of Title
CR	Crown (land)
DEW	Department for Environment and Water (South Australia)
ha	Hectares
IBRA	Interim Biogeographic Regionalisation of Australia
kV	Kilovolt
MW	Megawatt
NV Act	*Native Vegetation Act 1991*
NV Fund	Native Vegetation Fund
NVC	Native Vegetation Council
SEB	Significant Environmental Benefit
STAM	Scattered Tree Assessment Method

Contents

Abbreviations i

1.0 Introduction 1

1.1 Scope and Objectives 1

1.2 Offset Requirements 1

1.2.1 Significant Environmental Benefit 1

1.2.2 SEB Management Actions 2

1.3 Barn Hill Wind Farm 3

1.3.1 Administrative Boundaries 4

1.3.2 Native Vegetation Impacts 4

2.0 Methods 5

2.1 Desktop Assessment 5

2.2 Field Assessment 5

2.3 Consultation 5

3.0 SEB Investigation Results 7

3.1 Sites Within the Wind Farm Boundary 1

3.1.1 Site 1 1

3.1.2 Site 2 2

3.1.3 Site 3 2

3.1.4 Site 4 3

3.2 Sites Outside the Wind Farm Boundary 4

3.2.1 Site 5 (Forestry Block) 4

3.2.2 Site 6 (Saltmarsh) 5

3.2.3 Site 7 (Broughton River) 6

3.3 Site Characteristic Summary 6

4.0 SEB Site Suitability Summary 8

5.0 References 11

Figures

Figure 3.1 Overview of SEB Investigation Sites 1

Tables

Table 3.1 Offset Area Other Attributes 6

Table 4.1 Summary of Offset Suitability 9

Photos

Photo 3.1 Site 1, Facing North (4 March 2025, Umwelt). 1

Photo 3.2 Site 3, *Acacia nyssophylla* Shrubland over *Austrostipa* spp. Facing South (September 2023, Umwelt). 2

Photo 3.3 Site 4, Facing North Toward Clements Gap Wind Farm, (4 March 2025, Umwelt). 3

Photo 3.4 Site 5, Forestry Block on Larcombes Track (30 January 2024, Umwelt). 4

Photo 3.5 Site 6, Saltmarsh Along Collinsfield Road (September 2023, Umwelt). 5

Photo 3.6 Site 7, Broughton River (Redhill) Facing East (6 March 2025, Umwelt). 6

1.0 Introduction

The Project is located in the Mid-North region of South Australia, between Mundoora and Redhill, and comprises up to 50 wind turbine generators, an overhead transmission line and associated infrastructure.

1.1 Scope and Objectives

Native vegetation clearance required for the Project must be offset under the *Native Vegetation Act 1991*. The available offset mechanisms include establishing a new on-ground Significant Environmental Benefit (SEB) area, obtaining credits from an existing SEB area or third-party provider, or making a payment into the Native Vegetation Fund. An on-ground offset must provide a net environmental gain, preferably protect like-for-like vegetation near the impact area, and be secured for at least as long as the Project's impacts.

Umwelt was engaged by AGL Energy Limited, on behalf of Barn Hill Wind Farm Pty Ltd, to investigate opportunities for an on-ground SEB offset for the Barn Hill Wind Farm, considering the values outlined by associated legislation and described further below.

1.2 Offset Requirements

All proposed development projects are subject to State and Commonwealth laws for protection of the environment, including the NV Act (South Australia). Assuming that impacts cannot be avoided, and that to the extent reasonably possible, impacts have been avoided and minimised during project development phase, certain criteria apply for the establishment of suitable offsets, described in detail in **Section 1.2.1.**

Documents which should be referred to for full detail include:

- Native Vegetation Council (2020). Policy for a Significant Environmental Benefit Under the *Native Vegetation Act 1991* and Native Vegetation Regulations 2017. Government of South Australia.
- Native Vegetation Council (2020). Guide for calculating a Significant Environmental Benefit Under the *Native Vegetation Act 1991* and Native Vegetation Regulations 2017. Government of South Australia.

1.2.1 Significant Environmental Benefit

An SEB is achieved through the establishment of an area of land to be managed and protected for the growth / enhancement of native vegetation. The NVC must be satisfied that even after allowing for clearance of native vegetation, the overall condition of the environment will be improved and result in a net environmental gain. In order to achieve a significant benefit, the gain to the environment must be greater than the loss by a specified amount. In order to achieve an SEB, a proponent will have multiple options available to them. This includes providing an on-ground SEB through the following means:

- providing a new SEB Area

- using credit from an existing SEB Area
- obtaining SEB credit from someone else
- engaging a Third-Party Provider to deliver a SEB.

Alternatively, a proponent may make a payment into the Native Vegetation Fund, however, proponents with projects that have an offset obligation of greater than 150 SEB points, must make a reasonable attempt to identify an on-ground SEB before a payment will be accepted. Refer to the SEB Policy for further details. If a proponent chooses an on-ground SEB option, an assessment of the proposed SEB Area must occur in accordance with the following steps.

- Undertake an assessment of the proposed on-ground SEB in accordance with approved methodology (i.e. BAM / STAM in the Agricultural Region).
- Determine the biodiversity benefit, considering protection gain and management gain, where:
    - Protection gain is the likelihood of vegetation loss in the absence of protection (i.e. through management).
    - Management gain is the capacity and extent to which a site can recover or be restored, and the time required for restoration to occur.

Other principles associated with approved SEB areas include, that offsets should:

- Protect like-for-like vegetation, to ensure that vegetation species / communities and critical habitats are not systematically degraded or lost from the landscape.
- Be located in relatively close proximity to the site of impact to ensure the integrity of the local environment is maintained (i.e. same IBRA Association, IBRA Subregion or at the least, within the same IBRA Region).
- Secure outcomes for at least as long as the projects impact (i.e. typically permanent), and not in areas likely to be impacted by future development.

1.2.2 SEB Management Actions

1.2.2.1 Standard Offset Management Actions

A list of standard SEB offset area conditions is included below. These management actions would be required to be implemented, as a minimum,

- A SEB Area must be managed in accordance with a NVC approved management plan. The management plan will stipulate the management actions that must be undertaken over the initial 10 years from the establishment of the SEB Area, plus on-going monitoring and maintenance activities.
- Environmental threats and degrading processes must be managed within the SEB Area. In particular, a SEB Area must be managed in accordance with the following minimum commitments:
    - permanent exclusion of domestic stock: stock grazing may be permitted on occasions, but only if grazing is required for the sole purpose of ecological management and undertaken in accordance with an approved management plan

- where required, erect and maintain fences and gates in good stock proof condition at all times
- prevent the spread of and, as far as possible, eliminate established pest animals and plants
- not erect, place nor permit any structure or dwelling to be placed on the SEB Area
- not permit the removal, introduction or disturbance of any soil, rocks, or other minerals, or the construction of dams other than those already existing on the SEB Area
- not allow (unless required by law) any deterioration in the natural state or in the flow, supply, quantity or quality of any body of water onto or from the SEB Area, (for example, no construction of dams)
- not permit the removal of any standing or fallen timber
- no fertiliser application or artificial feeding
- no soil disturbance (beyond that which is necessary for agreed management actions)
- no cropping
- no dumping of rubbish, unwanted machinery or plant material.

1.2.2.2 Protection in Perpetuity

The Native Vegetation Council is likely to require a Heritage Agreement to be placed over the SEB Area, as is their current practice.

Heritage Agreements are established in perpetuity to protect and enhance the natural character of the site's flora and fauna. Each Heritage Agreement, while bound by standard conditions, is unique and can include clauses specific to the management of the native vegetation within the conservation area.

Any change in ownership or lease to the property that contains a Heritage Agreement area must be noted to the Native Vegetation Branch. Regardless of lease, transfer or sale, the Heritage Agreement remains binding on the property title holder at that time.

The contract is formed between a landowner and the Minister responsible for *the Native Vegetation Act 1991* (the Act).

The NVC is an advisory body to the Minister. According to Section 23(5) of the Act, the Minister must not enter into, vary or terminate a Heritage Agreement without first consulting and obtaining the approval of the NVC.

Water points need to be decommissioned in an area of a Heritage Agreement, unless accompanied by an approved grazing management plan.

1.3 Barn Hill Wind Farm

The Barn Hill Wind Farm Project comprises a wind farm of up to 360 Megawatts (MW) incorporating up to 50 wind turbines, a 270 MW grid-scale Battery Energy Storage System, a 275 kilovolt (kV) transmission line to connect the Project to the grid. The Project also includes associated infrastructure, including underground and overhead electrical cables, a high voltage substation with associated infrastructure, operations and maintenance facilities, meteorological monitoring masts, site access and egress improvements, local road treatments and internal tracks, drainage and stormwater management infrastructure, internal transmission line, security fencing, lighting and

surveillance, as well as related construction works and temporary construction compounds and facilities to support the delivery of the Project.

1.3.1 Administrative Boundaries

The Barn Hill Wind Farm is located in the Mid-North of South Australia, within the Port Pirie Regional Council and the Wakefield Regional Council, within the Hundreds of Barunga, Boucaut, Koolunga and Redhill, and the Northern and Yorke Landscape Management Region.

The Interim Biogeographic Regionalisation of Australia (IBRA), which broadly describe areas of similar topography, geology, soil, and vegetation composition, puts the Project Area within the Eyre Yorke Block IBRA Bioregion and St Vincent Subregion, represented by the Barung and Crystal Brook IBRA Environmental Associations.

1.3.2 Native Vegetation Impacts

A draft native vegetation clearance application was prepared by EBS Ecology (now Umwelt) in 2024 (EBS Ecology 2024). Data was collected in 4–9 September 2023 for the wind farm. The transmission line was surveyed 30–31 January 2024.

Based on the draft native vegetation clearance assessment, the Project was estimated to require the clearance of approximately 58.83 hectares of native vegetation and one scattered tree. The corresponding indicative offset obligation was approximately 2,276.62 SEB points, equivalent to approximately 284.51 hectares of on-ground offset or a payment of $1,683,970.29, including GST and the administration fee.

These figures were based on an earlier Project design and superseded assessment scoresheets. They should therefore be treated as indicative.

Native vegetation associations proposed to be impacted by the Project include:

- *Themeda triandra* +/- *Lomandra* spp. Grassland.
- *Bursaria spinosa* Shrubland +/- emergent *Allocasuarina verticillata* over *Themeda triandra* and *Lomandra* spp.
- *Austrostipa* spp. Grassland.
- *Lomandra* spp. Grassland
- *Pimelea stricta* Shrubland
- Mixed tall shrubland over native grasses and forbs
- Mixed chenopod shrubland +/- *Acacia victoriae* ssp.
- *Salsola australis* shrubland.

2.0 Methods

2.1 Desktop Assessment

A preliminary desktop feasibility assessment considered the offset assessment guidelines and practical implementation considerations to determine potential suitability of a site, including:

- Likelihood of containing similar vegetation associations and flora and fauna species assemblages as the impacted sites.
- Landscape context similarity (i.e. same IBRA Bioregion > Subregion > Association).
- Proximity to impact site.
- Habitat connectivity / value (i.e. proximity to existing protected areas such as Heritage Agreements or conservation areas).
- Parcel size (i.e. is it likely to meet SEB requirements).
- Landholder willingness to participate and ability to secure landholder agreements.

The desktop assessment incorporated information collected through previous ecological investigations undertaken for the Project, including native vegetation mapping, Bushland Assessment Method (BAM) survey data, threatened ecological community assessments, and native vegetation clearance calculations. Existing aerial photography and cadastral mapping were reviewed to identify parcels containing native vegetation that were located outside the approved development corridor and therefore unlikely to be affected by construction activities.

2.2 Field Assessment

Field observations used in this assessment were derived from ecological surveys undertaken for the Barn Hill Wind Farm between September 2023 and March 2025. Vegetation condition information was obtained from BAM assessments completed as part of the native vegetation clearance investigations, supplemented by targeted site inspections undertaken during subsequent ecological and bird and bat monitoring surveys.

The field assessment focused on confirming vegetation condition, management history, surrounding land use, evidence of fragmentation, stock access, weed burden and opportunities for vegetation improvement. No additional BAM assessments were undertaken specifically for this SEB investigation, with existing survey data and visual inspections used to determine the suitability of potential offset areas outside of the Barn Hill Wind Farm Project Area.

2.3 Consultation

Consultation was undertaken with [redacted] throughout the investigation process, including discussions with [redacted], regarding potential offset opportunities and landholder considerations. Site inspections were undertaken with AGL representatives during field visits in March 2025 and local knowledge regarding land management, fencing history and landholder preferences was considered where available.

Following completion of the initial feasibility investigations, Umwelt discussed potential offset pathways with the Native Vegetation Branch, including the suitability of several candidate offset areas and the broader challenges associated with identifying like-for-like offsets within the locality.

Investigations subsequently focused on the *Acacia nyssophylla* shrubland area (Site 3) as the most suitable conventional offset opportunity. Discussion also occurred regarding the potential for weed control and revegetation works along the Broughton River as a novel offset approach, noting further consideration by the Native Vegetation Branch and Native Vegetation Council would be required before such an approach could be supported. The discussions raised uncertainty around the suitability of this option under the current SEB policy as well as land tenure constraints, like-for-like limitations and corridor width restrictions.

The meetings held with the Native Vegetation Branch (NVB) to discuss the feasibility investigations are summarised below:

- Meeting Date: 8 May 2025
  - [redacted]
  - Discussed potential SEB areas identified, with the advice to continue investigations at one area (Site 3).
  - Site 7 (Broughton River) was discussed as a novel approach, however limitations included land tenure (road reserve), like-for-like vegetation type and corridor width requirements (minimum 30 m wide).
- Meeting Date: 13 October 2025
  - [redacted]
  - [redacted] the limitations with the SEB offset investigation, concluding that no suitable offset was able to be found.

3.0 SEB Investigation Results

The SEB feasibility investigations incorporated:

- Ecological survey information collected for the Project since 2011.
- Detailed flora surveys of the wind farm area undertaken between 4 and 9 September 2023.
- Flora surveys of the transmission line undertaken on 30 and 31 January 2024.
- Observations made during subsequent field surveys, including bird and bat surveys undertaken in November 2024 and March 2025.
- Desktop review of vegetation mapping, land tenure, development constraints and aerial imagery.
- Consideration of surrounding land uses, including cropping and grazing.
- Discussions with [redacted].
- Preliminary calculation of the potential SEB points that could be generated by the most promising site.

Seven potential offset locations (**Figure 3.1**) were selected for further investigation including four sites located within the wind farm boundary but outside the approved development corridor and three additional options outside the wind farm boundary, comprising a forestry block, a saltmarsh area and a section of the Broughton River at Redhill, detailed further in the following sections.

All sites were within the administrative boundaries affected by the Project, as described in **Section 1.3.1.**

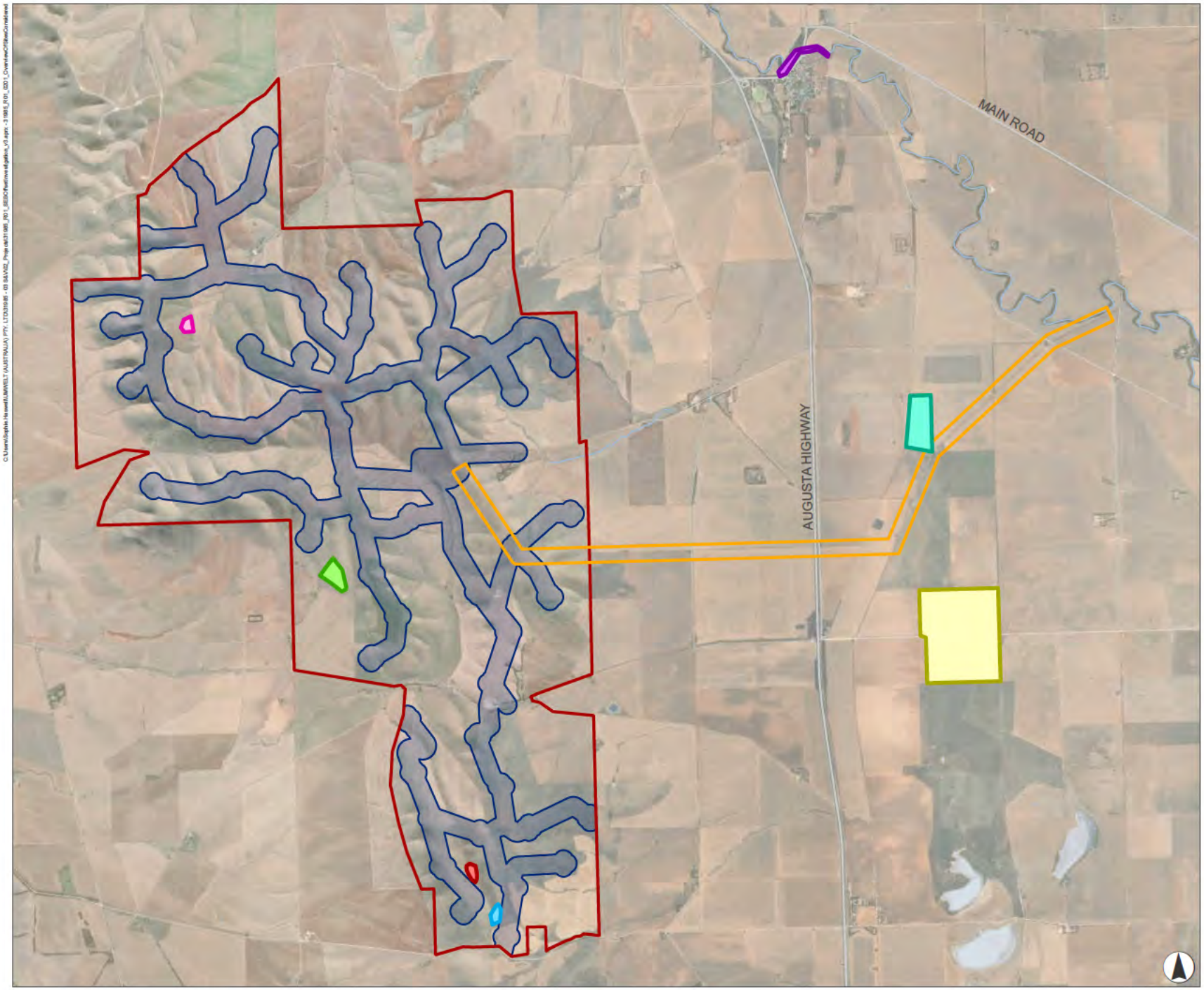


FIGURE 2.1

Overview of Sites Considered

Legend

- Wind Farm Boundary
- Transmission Line Corridor
- Proposed Approval Corridor
- Main road
- Water course
- Water body

Offset Sites Considered

- Site 1
- Site 2
- Site 3
- Site 4
- Site 5
- Site 6
- Site 7

0 1 2

Kilometres

Scale 1:70,000 at A4
GDA2020 MGA Zone 54

This document and the information are subject to Terms and Conditions and Umwelt (Australia) Pty Ltd ("Umwelt") Copyright in the drawings, information and data recorded ("the information") is the property of Umwelt. This document and the information are solely for the use of the authorized recipient and this document may not be used, copied or reproduced in whole or part for any purpose other than that which it was supplied by Umwelt. Umwelt makes no representation, undertakes no duty and accepts no responsibility to any third party who may use or rely upon this document or the information.
APPROVED FOR AND ON BEHALF OF Umwelt

Image Source: ESRI Basemap (2025) | **Data Source:** SA DIT, SA DEW (2024)

3.1 Sites Within the Wind Farm Boundary

3.1.1 Site 1

Site 1 (CT 570 720) comprises approximately 2.25 ha of native vegetation mapped as *Bursaria spinosa* shrubland with emergent *Allocasuarina verticillata* over a native grassland understorey. The site occurs within a small gully and is currently protected by existing stock exclusion fencing. The vegetation displayed a relatively diverse native ground layer and appeared to be responding positively to the exclusion of stock grazing.

Despite the vegetation values present, the site is small, isolated and poorly connected to surrounding native vegetation. The site has already received the primary management intervention likely to generate ecological gains, being long-term stock exclusion, limiting the opportunity for additional measurable improvement through SEB management actions.



Photo 3.1 Site 1, Facing North (4 March 2025, Umwelt).

3.1.2 Site 2

Site 2 (CT 5363 297) comprises approximately 2.38 ha of native vegetation occurring within the same general landscape setting as Site 1. The site supports vegetation consistent with *Bursaria spinosa* shrubland over native grassland associations.

The site is similarly constrained by its small size and limited connectivity to other native vegetation remnants. While native vegetation condition appears reasonable, the site is unlikely to generate substantial additional gains through management and is therefore assessed as having limited suitability as a stand-alone offset area.

3.1.3 Site 3

Site 3 (CT 5363 297) was initially identified as a 7.72 ha patch of *Acacia nyssophylla* shrubland over *Austrostipa grassland* located outside the proposed disturbance footprint. Subsequent investigations expanded the area under consideration to approximately 27 ha by incorporating surrounding native grassland communities and designing a practical offset boundary based on landform and existing fencing.

The site contains vegetation associations directly comparable to those impacted by construction of the Project and represents the largest contiguous area of suitable native vegetation identified during the investigation. Preliminary calculations indicated that the site could generate approximately 165 SEB points, equivalent to approximately 7 to 10% of the Project's indicative offset requirement.

Although insufficient to satisfy the Project's entire offset obligation, Site 3 has the strongest potential to form part of an on-ground offset strategy due to its size, condition, vegetation diversity and capacity for long-term management.



Photo 3.2 Site 3, *Acacia nyssophylla* Shrubland over *Austrostipa* spp. Facing South (September 2023, Umwelt).

3.1.4 Site 4

Site 4 comprises approximately 2.38 ha of native vegetation surrounded by cropping land. The vegetation patch exhibits characteristics consistent with previously mapped *Bursaria spinosa* shrubland communities.

Although the patch has persisted within the agricultural landscape, its small size and exposure to edge effects from surrounding cropping activities substantially limit its capacity to generate meaningful biodiversity gains. Consequently, the site is considered unsuitable as a primary offset area.

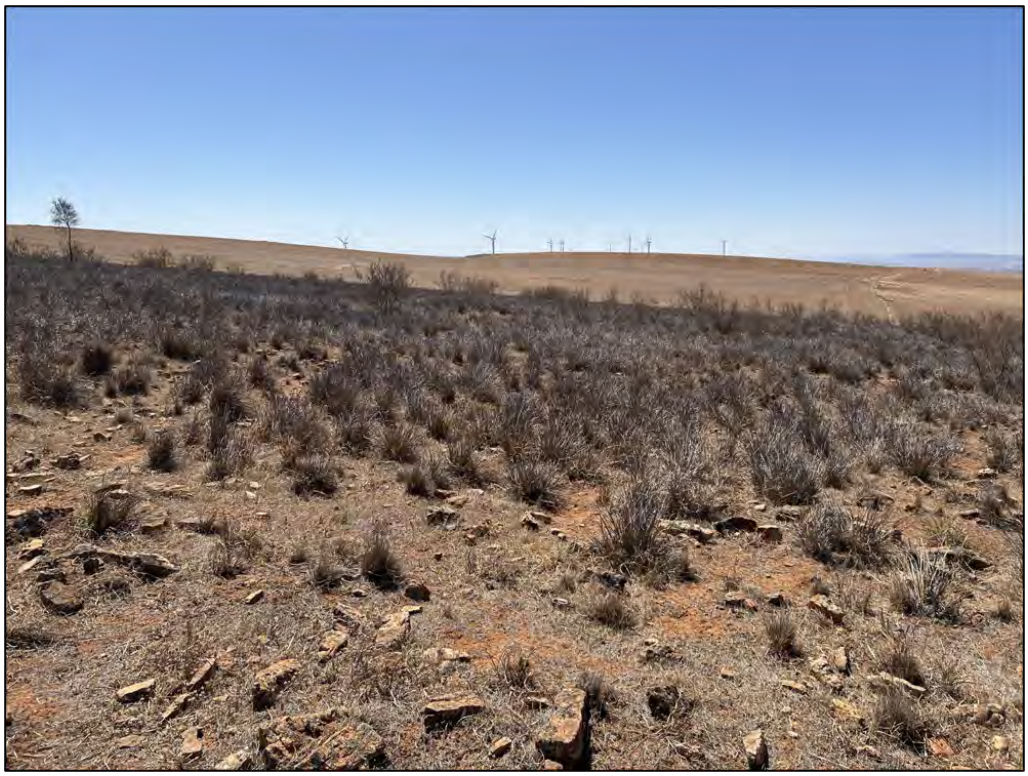


Photo 3.3 Site 4, Facing North Toward Clements Gap Wind Farm, (4 March 2025, Umwelt).

3.2 Sites Outside the Wind Farm Boundary

3.2.1 Site 5 (Forestry Block)

A Department for Environment and Water (DEW) forestry block (CR/5765/948) east of the Project Area was assessed following its identification by [redacted] as a potential offset opportunity. The site comprises three land parcels totalling approximately 22 ha. The block comprises predominantly planted vegetation, including species that are not indigenous to the locality and species listed as Declared under the *Landscape South Australia Act 2019*, *Casuarina glauca*.

As the vegetation is largely the result of previous planting activities, does not represent a remnant native vegetation community comparable to those impacted by the Project, and comprises Crown Land, the site is considered unsuitable for SEB offset purposes.



Photo 3.4 Site 5, Forestry Block on Larcombes Track (30 January 2024, Umwelt).

3.2.2 Site 6 (Saltmarsh)

A large area of saltmarsh vegetation was identified along Collinsfield Road (within CT/6077/695, CT/5596/558, CT/5674/575, CT/6077/695). While the site represents a substantial area of native vegetation, it differs markedly from the vegetation communities proposed to be impacted by the Project.

The area does not satisfy the like-for-like principle that underpins SEB assessments and is also likely to have ongoing agricultural value. Consequently, the site is not considered suitable as an offset area.



Photo 3.5 Site 6, Saltmarsh Along Collinsfield Road (September 2023, Umwelt).

3.2.3 Site 7 (Broughton River)

The Broughton River at Redhill (CR/5758/715) was investigated as a potential opportunity for landscape-scale weed control and revegetation works. Unlike the other sites assessed, this option represents a restoration-based offset rather than protection of an existing remnant vegetation patch.

While the concept has merit from a landscape restoration perspective, it represents a novel offset approach that would require specific support from the Native Vegetation Branch and Native Vegetation Council. At the time of assessment, sufficient information was not available to confirm whether this approach would be accepted as an eligible SEB, however, subsequent conversations with NVC indicate that the land tenure and the narrow linear geometry of the corridor, make it unsuitable for a SEB Offset.



Photo 3.6 Site 7, Broughton River (Redhill) Facing East (6 March 2025, Umwelt).

3.3 Site Characteristic Summary

Table 3.1 summarises the characteristics associated with each site as it relates to the SEB principles described in **Section 1.2.1.**

Table 3.1 Offset Area Other Attributes

	Site 1	Site 2	Site 3	Site 4	Site 5	Site 6	Site 7
Like for like administrative context	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Like for like vegetation	Yes	Yes	Limited	Yes	No	No	No
Connectivity to remnant vegetation	Low	Low	Moderate	No	No	No	Low

	Site 1	Site 2	Site 3	Site 4	Site 5	Site 6	Site 7
Connectivity to protected areas	No	No	No	No	No	No	No
Management potential	Limited	Limited	Moderate	Moderate	Limited	Moderate	Moderate
Sufficient size	No (2.25 ha)	No (2.38 ha)	Partial (27 ha)	No (2.38 ha)	Partial (21.76 ha)	Yes (123.77 ha)	Not defined.
Landholder amenability	No	No	No	No	Not defined	Not defined	Not defined

4.0 SEB Site Suitability Summary

A range of potential on-ground SEB opportunities were investigated both within and outside of the Barn Hill Wind Farm Project Area. Investigations included desktop assessment of historical ecological survey information, review of vegetation mapping and native vegetation clearance data, targeted field inspections, consideration of land tenure constraints, consultation with [redacted] representatives and discussions with the Native Vegetation Branch regarding potential offset pathways.

The initial assessment found that the potential sites within the wind farm boundary were generally small, fragmented and subject to edge effects associated with surrounding agricultural land. Sites 1, 2 and 4 were assessed as having limited capacity to generate meaningful biodiversity gains.

The options outside the wind farm boundary were also assessed as having limited suitability:

- The forestry block was not considered suitable because it contained planted trees, including species not indigenous to the region, and the planted vegetation would not contribute meaningfully to SEB gains.
- The saltmarsh was considered unlikely to provide a like-for-like offset because the Project does not propose to clear saltmarsh vegetation.
- Weed control and possible revegetation along the Broughton River at Redhill was identified as a potentially beneficial but novel offset approach that would require consideration and acceptance by the Native Vegetation Branch before it could be progressed.

The most promising conventional offset opportunity identified during the investigations was the *Acacia nyssophylla* shrubland area (Site 3). This site contained vegetation associations comparable to those impacted by the Project and represented the largest contiguous area of native vegetation identified during the assessment, though still only providing a small portion (<10%) of the required offset. Subsequent investigations expanded the area under consideration and preliminary calculations indicated that the site could contribute toward the Project's SEB obligation. However, while Site 3 was considered the most ecologically suitable option identified, it was not a deliverable SEB solution because the proponent was unable to secure the land for long-term offset management, and the area would only satisfy a small proportion of the Project's total SEB obligation.

Additional discussions were undertaken regarding alternative offset opportunities outside of the Project Area, including restoration and revegetation opportunities along the Broughton River near Redhill. While this option offered potential landscape-scale environmental benefits, discussions with the Native Vegetation Branch indicated that the proposal was unlikely to satisfy SEB requirements due to factors including land tenure constraints, the difficulty in demonstrating a like-for-like outcome, and limitations associated with the linear nature and width of the corridor. Consequently, this option was not considered a viable SEB solution.

Based on the investigations undertaken, the proponent has made reasonable attempts to identify an on-ground SEB offset for the Project. Several potential offset opportunities were investigated within and outside of the Project Area, however, no suitable and deliverable on-ground SEB area was identified that could be secured and approved in accordance with current SEB policy requirements, as summarised in **Table 4.1**.

The investigations documented in this report demonstrate that the Proponent has undertaken a thorough assessment of available offset opportunities within the locality and pursued multiple

potential pathways in consultation with relevant stakeholders and regulators. Despite these efforts, no feasible on-ground offset solution was identified, and it is therefore concluded that payment into the Native Vegetation Fund is considered the appropriate mechanism for satisfying the Project's SEB obligation.

Table 4.1 Summary of Offset Suitability

Site	Approx. Area (ha)	Vegetation / Offset Opportunity	Key Advantages	Key Constraints	Overall Suitability
Site 1	2.25	*Bursaria spinosa* shrubland over native grassland	Existing native vegetation in fair condition. Stock exclusion fencing already present.	Small, isolated and fragmented remnant. Existing fencing means limited opportunity for further management gains. Low capacity to generate meaningful SEB gains.	Poor
Site 2	2.38	*Bursaria spinosa* shrubland over native grassland	Native vegetation remnant with some connectivity to nearby vegetation.	Small size, fragmented landscape context and limited potential for measurable biodiversity gains.	Poor
Site 3 (Acacia Offset Area)	27.02	*Acacia nyssophylla* shrubland over *Austrostipa* spp. with surrounding native grasslands	Largest contiguous area identified. Contains vegetation associations comparable to those impacted by the Project. Preliminary calculations indicated potential to contribute toward the Project's SEB obligation.	Landholder unwilling to pursue establishment of an offset area. Unable to secure long-term management arrangements required for an SEB. Would only address a portion of the Project's total SEB obligation.	Small, but ecologically suitable, however, not feasible to implement due to landholder constraints.
Site 4	2.38	*Bursaria spinosa* shrubland over native grassland	Retained native vegetation patch within agricultural landscape.	Small remnant surrounded by cropping land. High edge effects and limited opportunity to generate substantial biodiversity gains.	Poor
Site 5 (Forestry Block)	21.76	Planted vegetation / forestry area	Relatively large area available.	Vegetation predominantly planted and includes non-local species. Does not represent a suitable remnant vegetation community for SEB purposes. Potential future forestry use also constrains offset suitability.	Poor
Site 6 (Saltmarsh)	123.77	Saltmarsh vegetation community	Large area of native vegetation.	Does not satisfy like-for-like principles as the Project does not impact saltmarsh vegetation. Existing agricultural value and grazing use likely to constrain implementation.	Poor
Site 7 (Broughton River, Redhill)	Not defined.	Weed control and revegetation along riparian corridor.	Potential landscape-scale environmental benefit through restoration and weed management.	Discussions with the Native Vegetation Branch indicated constraints associated with land tenure, like-for-like requirements and the narrow width of the corridor. Uncertainty regarding	Unsuitable under current SEB framework

Site	Approx. Area (ha)	Vegetation / Offset Opportunity	Key Advantages	Key Constraints	Overall Suitability
				acceptability under current SEB policy.	

5.0 References

EBS Ecology (2024). Barn Hill Wind Farm and Battery Project Native Vegetation Clearance Data Report. Report to WSP Global Inc. EBS Ecology, Adelaide.

Native Vegetation Council (2024a). Policy for a Significant Environmental Benefit Under the Native Vegetation Act 1991 and Native Vegetation Regulations 2017. Government of South Australia.

Native Vegetation Council (2024b). Guide for calculating a Significant Environmental Benefit Under the Native Vegetation Act 1991 and Native Vegetation Regulations 2017. Government of South Australia.

Native Vegetation Council (NVC) (2020c). Bushland Assessment Manual July 2020. Native Vegetation Council, Adelaide.

umwelt

P 1300 793 267 E info@umwelt.com.au W umwelt.com.au

NSW | ACT | WA | QLD | VIC | SA ABN 18 059 519 041