

22 August 2023



Planning Secretary
Department of Planning and Environment

via Major Project Portal

Dear Planning Secretary

Re: Ungula Wind Farm – Secondary Intersection upgrades (Ilgingery Rd and Ungula Rd)

Squadron Energy Pty Ltd (SQE) is writing to the Department of Planning and Environment (DPE) in response to a request for additional information relating to our request for the minor relocation of two Secondary Intersections located on Ilgingery Road and Ungula Road, to accommodate the micro-siting of internal access roads (Major Project Portal Ref. SSD-6687-PA-16).

The requested information is:

1. Confirm whether the biodiversity offset calculations considered the proposed intersection locations.
2. Provide evidence that biodiversity and other impacts are consistent with those approved under the consent.

SQE's responses are provided below.

1. Confirm whether the biodiversity offset calculations considered the proposed intersection locations.

Biodiversity offset requirements for the development were calculated in May 2023, and involved consultation with the Biodiversity Conservation Science Directorate (BCS). The BCS have accepted the calculations – please refer to the BCS letter at Attachment 1.

SQE can confirm that the biodiversity offset calculations have factored in the proposed relocated intersection locations, together with the impacts associated with the micro-sited internal access road approaching those intersections.

2. Provide evidence that biodiversity and other impacts are consistent with those approved under the consent.

Biodiversity impacts

The biodiversity offset calculations were based on the disturbance footprint inclusive of the relocated intersections per our current request. The biodiversity offset calculations for the current 'final disturbance footprint' indicate that the clearing remains below the restrictions set within Condition B20 of SSD-6687. A comparison is provided in the Table 1.

Table 1

Vegetation type	Clearing limit (B20)	Final disturbance footprint calculations (from biodiversity offset calculations)
BC Act listed White-Box-Yellow Box-Blakely's Red Gum Woodland CEEC	28.73 ha	20.02 ha ¹
EPBC Act listed White Box-Yellow Box-Blakely's Red Gum Grassy Woodland and Derived Native Grassland CEEC	13.88 ha	10.35 ha ²

The relocation of the intersection on Ilgingery Road would enable an internal access road to approach Ilgingery Road from Turbine No. 105, rather than Turbine No. 102. This would eliminate approximately 2.3 kilometres of internal access road between Turbine No. 102 and Ilgingery Road. By contrast, the access road between Turbine No. 105 and Ilgingery Road would be approximately 800 metres in length and will not involve any impact to any BC Act or EPBC Act listed vegetation communities.

Further, the Ilgingery Rd intersection relocation will eliminate the need for project vehicles to traverse a section of Ilgingery Road that contains the BC Act listed Box Gum Woodland vegetation community.

Similarly, the proposed intersection relocation at Uungula Road will have not result in any impact or change to the Development's overall clearing areas for BC Act or EPBC Act listed vegetation communities.

The proposed intersection relocation would not result in any increase to biodiversity impacts permitted under the consent. Rather, the impacts to biodiversity would be reduced as a result of the relocations.

Other impacts

SQE can confirm that the proposed intersection relocation and associated access track micro-siting will not result in any additional impact to known Heritage items.

The surface disturbance associated with the intersection relocations and associated access track micro-siting remains within the development corridor, as shown in the mapping at Attachment 2.

As outlined in our previous submission, the revised location of the access track infrastructure would not result in any non-compliance with the conditions of the consent. The biodiversity and other impacts are consistent with those approved under the consent.

Conclusion

Pursuant to Condition B30, SQE requests the Planning Secretary's agreement to relocate the secondary intersections, as described in this letter, to accommodate the micro-siting of internal access roads.

If you have any questions or require further information, please don't hesitate to contact me.

Yours sincerely,



Alana Gordijn
Environmental Manager
 For and behalf of Uungula Wind Farm Pty Ltd

¹ Comprises Vegetation Zones 1, 8 and 10.

² Comprises Vegetation Zones 1 & 8.



Attachment 1 – Biodiversity impact calculations (BCS letter)

Our ref: DOC23/498674

Alana Gordijn
Environmental Manager
Squadron Energy
Alana.gordijn@squadronenergy.com

Dear Alana

Uungula Wind Farm – Offsets liability

Thank you for your email dated 19 May 2023 to the Biodiversity, Conservation and Science Directorate (BCS) of the Department of Planning and Environment (DPE) inviting comments on the proposed strategy to calculate the revised offset requirement for Uungula Wind Farm. BCS also notes that supplementary material was provided to us on 23 and 25 May 2023, via email.

BCS is satisfied that the approach to recalculating the offset requirements for Uungula Wind Farm is sound.

Our preference, if engineering options allow, is that adjacent linear features such as roads and cabling are consolidated into a single footprint wherever possible (see Figure 1). This would largely eliminate concerns around the ability of clearing contractors to negotiate a more complicated footprint. It will also reduce potential indirect impacts of native vegetation between these corridors and, potentially, reduce the overall impact area resulting in further avoidance and a reduced offset liability.

In addition, given the inherent complexity of the development footprint, we consider it critical that a specific protocol is prepared detailing the method and reporting for tracking that actual disturbance limits remain within the proposed clearing and credit calculations. This protocol should be included as an attachment to the Biodiversity Management Plan for the project which is currently being prepared.

The final disturbance footprint clearing calculations have been attached to this letter in **Attachment A**.

If you have any questions about this advice, please do not hesitate to contact David Geering, Senior Conservation Planning Officer, via david.geering@environment.nsw.gov.au or (02) 6883 5335.

Yours sincerely



Ben Ellis
A/Principal Project Manager, Planning North West
Biodiversity, Conservation and Science Directorate

15 June 2023



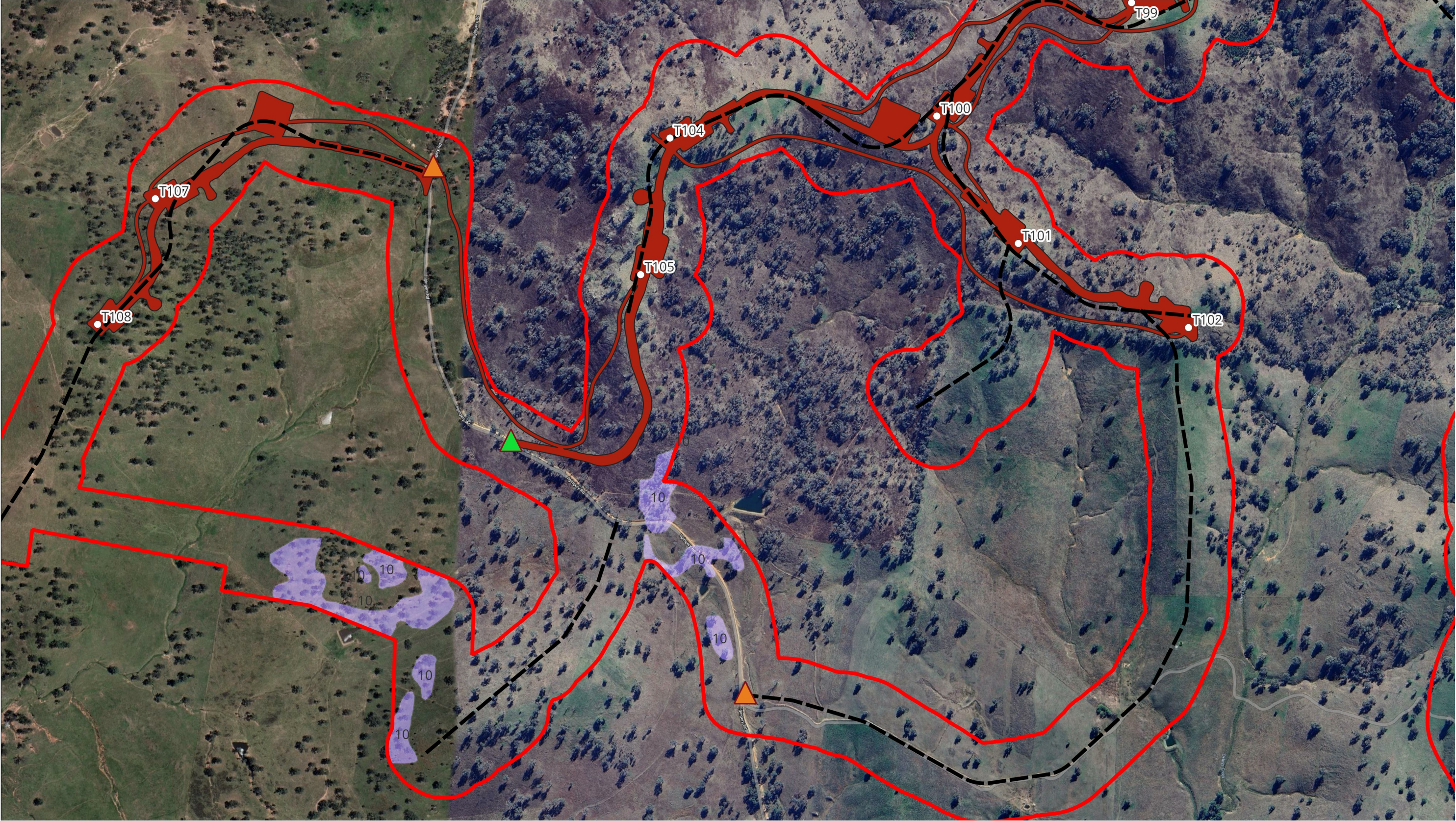
Figure 1 Example of where clearing efficiencies may be achieved by further consolidating linear infrastructure.

Attachment A final disturbance footprint clearing calculations

Vegetation Impacts - Uungula Wind Farm 'Final Disturbance Footprint'						
Vegetation Zone	Veg Zone ID	PCT	HBT	Total impact area per 'EIS disturbance footprint'	Total impact area per 'final disturbance footprint' (ha)	Impact area with 5% uplift to civil and electrical design* (ha)
Blakely's Red Gum - Yellow Box grassy woodland of the NSW South Western Slopes Bioregion - Mod_Good - Mod	1	277	N	6.28	5.44	5.46
Blakely's Red Gum - Yellow Box grassy woodland of the NSW South Western Slopes Bioregion - Mod_Good - Poor_GrsInd	2	277	N	60.91	59.24	60.83
Red Stringybark woodland of the dry slopes of the South Western Slopes Bioregion - Mod_Good - Mod	3	1095/331	Y	18.78	15.14	15.74
Red Stringybark woodland of the dry slopes of the South Western Slopes Bioregion - Mod_Good - Poor_GrsInd	4	1095/331	Y	26	22.18	22.95
Red Stringybark woodland of the dry slopes of the South Western Slopes Bioregion - Mod_Good - Poor_Weedy	5	1095/331	Y	7.21	5.77	6.03
Tumbledown Red Gum - Black Cypress Pine - Red Box low woodland of hills of the South Western Slopes - Mod_Good - Mod	6	1279	Y (659), N (283)	16.26	6.58	6.91
Tumbledown Red Gum - Black Cypress Pine - Red Box low woodland of hills of the South Western Slopes - Mod_Good - Poor_GrsInd	7	1279	Y (659), N (283)	11.27	10.39	10.74
White Box - Rough-barked Apple alluvial woodland on the NSW western slopes - Mod_Good - Mod	8	274	N	7.87	4.78	4.89
White Box - Rough-barked Apple alluvial woodland on the NSW western slopes - Mod_Good - Poor_GrsInd	9	274	Y	45.3	25.87	26.92
White Box - Tumbledown Gum woodland on fine-grained sediments on the NSW central western slopes - Mod_Good - Mod	10	270	Y	14.56	9.52	9.67
White Box - Tumbledown Gum woodland on fine-grained sediments on the NSW central western slopes - Mod_Good - Poor_GrsInd	11	270	Y	301.67	155.41	162.12
White Box - Tumbledown Gum woodland on fine-grained sediments on the NSW central western slopes - Mod_Good - Poor_Weedy	12	270	Y	72.15	53.77	56.40
White Box - Tumbledown Gum woodland on fine-grained sediments on the NSW central western slopes - Low - Poor_Weedy	13	270	Y	37.11	12.52	13.12
			SUM	625.37	386.62	401.77



Attachment 1 – Mapping of Secondary Intersection relocation



Legend Development Corridor (Mod 1) Original Access track centreline (EIS) WTG layout Disturbance Footprint Area Secondary intersections Relocated Secondary Intersection - Ilgingery Rd Original Secondary Intersection - Ilgingery Rd Baseline Vegetation Mapping Veg Zone 10 (BC Act)	Company		Uungula Wind Farm Pty Ltd		SQUADRON ENERGY					
	Title					Relocation of Secondary Intersections				
	Date	22 August 2023	Projection	MGA95 Zn55	Drawing No		Rev	1	Ver	A
	Drawn By	A Gordijn	Checked By	A Gordijn	Sheet	1 of 2	Proj Code	UWF	Size	A3



Legend Development Corridor (Mod 1) Original Access track centreline (EIS) WTG layout Disturbance Footprint Area Secondary intersections Original Secondary Intersection - Uungula Rd Relocated Secondary Intersection - Uungula Rd	Company Uungula Wind Farm Pty Ltd SQUADRON ENERGY				
	Title Relocation of Secondary Intersections				
	Date 22 August 2023	Projection MGA95 Zn55	Drawing No	Rev 1	Ver A
	Drawn By A Gordijn	Checked By A Gordijn	Sheet 2 of 2	Proj Code UWF	Size A3