

The Planning Secretary
Department of Planning, Industry and Environment
GPO Box 39
Sydney NSW 2001



27 October 2021

Dear Planning Secretary,

Re: Ungula Wind Farm SSD-6687 – Request for additional site access points (CoA B28)

Ungula Wind Farm Pty Ltd (UWF) is writing to the Planning Secretary to provide a summary of consultation which has occurred following the submission of the request. To be clear, the request is for Planning Secretary agreement for vehicles to travel to and from the Ungula Wind Farm Site (the site) via additional site access routes and points during the pre-construction phase of the project (relates to condition B28).

Condition B28 of SSD-6687 requires that:

- B.28 All heavy and light vehicles associated with the development must travel to and from the site via Twelve Mile Road (west) and the approved site access point off Twelve Mile Road, as identified by the 'Project Access Route' in the figure in Appendix 8, unless the Planning Secretary agrees otherwise.

Note: To avoid any doubt, this consent does not allow the use of Twelve Mile Road east of the approved site access point off Twelve Mile Road for heavy or light vehicle access, unless the Planning Secretary agrees otherwise.

UWF is requesting the Planning Secretary's agreement to use additional site access points via Ungula Road, Wuuluman Road, and Ilgingery Road, for the purpose of conducting a range of pre-construction minor works. The pre-construction minor works have commenced (although using only the main site entry) and would continue until the commencement of construction (currently scheduled for April 2022).

Reasons for this request

- Use of the single approved access road off Twelve Mile Road (west) during the pre-construction minor works is not considered feasible or practical. At present, large areas of the Site cannot be accessed by vehicle from the approved site access point due to the lack of formed internal tracks/roads.
- Additional site access points have been identified which would be accessed via existing, stable local roads that provide a safer and more practical option for accessing remote locations of the site. Details of these access points is provided in the section below.
- In the event of an emergency during the pre-construction minor works, there are concerns about personnel safety if vehicle access is limited to the single approved access point off Twelve Mile Road. Additional access points would allow for safer and more efficient travel to and from the site along existing formed roads.

Proposed site access routes and points

The proposed additional access routes are identified in Attachment 1. Existing farm access gates will be used as the proposed access points. The additional access routes and points are via existing unsealed local roads, as described below:

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2 Market Street
Newcastle, NSW 2300
Phone: +61 2 4013 4640

Sydney
Unit 11, Shore 2-3
13 Hickson Road
Dawes Point, NSW 2000

- **Uungula Road** (via Twelve Mile Road, west) - approximately 11 kilometres of this road would be used to gain access to and from the northern portion of the site.
- **Wuuluman Road** (via Uungula Road) - approximately 800 metres of this road would be used to gain access to and from the western and central portion of the site.
- **Ilgingery Road** (via Wuuluman Road) - approximately 7.07 kilometres of this road would be used (2.11 kilometres of which traverses the development corridor) to gain access to and from the far southern portion of the site.

These roads are unclassified local roads that have relatively consistent conditions and standards along their lengths. The pavement is unsealed and with a varying carriageway width of up to approximately 4 metres.

Description of pre-construction minor works

The pre-construction minor works would include the following works, in accordance with SSD-6687:

- **Investigative drilling, excavations or salvage:** geotechnical investigations are required to be completed across site and will involve the use of drill rigs and excavation of test pits.
- **Surveys:** including ecological survey, archaeological survey and general site survey/inspection by UWF personnel, contractors, and consultants.
- **Minor clearing or translocation of native vegetation:** to enable installation of monitoring equipment and completion of geotechnical investigations.
- **Construction of minor access roads and minor adjustments to services/utilities, etc**
- **Installation of environmental impact mitigation measures, fencing, enabling works**

Details of site access timeframes, vehicle types and volumes

Vehicle types and volumes anticipated during the pre-construction phase are summarised in the table below:

Work activity/ type	Timeframe for site access	Vehicle types	Average daily traffic movements ^{1,2} (approx.)	Peak daily traffic movements ¹ (approx.)
Geotechnical investigations	Field investigations are scheduled to occur over a three-week period in October and November 2021.	Light vehicles Drill rigs Flat-bed truck and trailer to transport 1 x 30T excavator	6 light vehicles <1 drill rig <1 flat-bed truck and trailer	8 light vehicles 2 drill rigs 1 flat-bed truck and trailer
Surveys / inspections	To be undertaken throughout the pre-construction phase (construction is currently scheduled to commence in April 2022).	Light vehicles (4WD) Light vehicles towing trailers	<1 light vehicle <1 light vehicle towing a trailer	10 light vehicles 1 light vehicle towing a trailer
Equipment maintenance	To be undertaken throughout the pre-construction phase.	Light vehicles (4WD) Light vehicles towing trailers	<1 light vehicle <1 light vehicle towing a trailer	4 light vehicles 4 light vehicles towing trailers

1. Vehicles have been averaged over the whole of the pre-construction period which, due to sporadic and ephemeral nature of the site activities, results in a very low average number of vehicles.

2. a vehicle movement is defined as two appearances of that vehicle i.e. once into the site and once out of the site.

Summary of consultation

UWF has undertaken consultation with the community and agencies during preparation of the EIS and the Response to Submissions process regarding to the use of the proposed additional access routes and points. Full details of the historical consultation and outcomes is provided in Attachment 3. A summary of the historical consultation is provided below:

- Potentially affected neighbours that use Ungula Road, Wuuluman Road and Ilgingery Road (letters and one-on-one consultation) (refer to Attachment 2 showing the involved / non-involved status of residences, noting that all but one residence located along the proposed route is 'involved' and that non-involved has been consulted upon regarding pre-construction minor works use of Ungula Road and has been offered a neighbour agreement).
- Community Consultative Committee Meetings.
- Planning documentation including the EIS, Submissions Report, and Amendment Report.
- Dubbo Regional Council (Attachment 3 details the consultation during and after the public exhibition phase of the EIS in which the proponent stated the proposed minor road access route would be used for pre-construction minor works and not for over-size over-mass (OSOM) or construction traffic) therefore road upgrades were not warranted
- Transport for NSW (TfNSW) (Attachment 3 details their submission which clearly identifies their guidance on road use restrictions relating to construction vehicles and OSOM using Ungula Road, both of which are managed with the commitment to use Twelve Mile Road as the main construction access route).

No submissions were received during the EIS exhibition period from any resident located along those routes.

In preparing this request UWF undertook consultation to notify potentially affected residences (including those living along the three roads) and consult with Council (Dubbo Regional Council (DRC)) and Transport for NSW (TfNSW). The table below shows the consultation undertaken in response to the DPIE request (residence codes are as per the attached plan and residence contact has occurred via the landowner).

Consultee	Date	Format	Outcome
Residences			
TMR032 (non-involved)	22/10/2021	Phone discussion (with follow up email)	Resident made aware of the proposed site access via Ungula Road, Wuuluman Road, Ilgingery Road. The resident mentioned the school bus times they avoid with their own heavy vehicles (8am-8:35am and 3:30pm-4:05pm).
UUN014 (involved)	15/10/2021	Email	As an involved residence they have already acknowledged the impacts of the project and accepted those. Consultation notified them of the upcoming site activities. No issues raised.
UUN002 (involved)	15/10/2021	Email	As an involved residence they have already acknowledged the impacts of the project and accepted those. Consultation notified them of the upcoming site activities. No issues raised.
UUN003 (involved)	15/10/2021	Email	As an involved residence they have already acknowledged the impacts of the project and accepted those. Consultation notified them of the upcoming site activities. No issues raised.
UUN001, UUN004 (involved)	NA	NA	These residences are involved and have already acknowledged the impacts of the project and accepted those. Unfortunately the proprietor is deceased.

Consultee	Date	Format	Outcome
UUN005 (involved)	15/10/21	Email	As an involved residence they have already acknowledged the impacts of the project and accepted those. Consultation notified them of the upcoming site activities. No issues raised.
ILG001 (involved)	25/10/21	Phone discussion and email	As an involved residence they have already acknowledged the impacts of the project and accepted those. Consultation notified them of the upcoming site activities. No issues raised.
ILG003 (involved)	15/10/21	Email	As an involved residence they have already acknowledged the impacts of the project and accepted those. Consultation notified them of the upcoming site activities. No issues raised.
ILG004 (involved)	15/10/21	Email	As an involved residence they have already acknowledged the impacts of the project and accepted those. Consultation notified them of the upcoming site activities. No issues raised.
ILG005 (involved)	15/10/21	Email	As an involved residence they have already acknowledged the impacts of the project and accepted those. Consultation notified them of the upcoming site activities. No issues raised.
Roads Authorities			
Transport for NSW	25/10/2021	Email and phone discussion	TfNSW response: As discussed, TfNSW, in principle, does not object to the proposal as described below, subject to: <ul style="list-style-type: none"> • All vehicular access to Goolma Road being obtained via the western intersection of Twelve Mile Road and Goolma Road. • The pre-construction routes providing a high level of safety, be that by temporary traffic control measures, upgrades or the like, developed in consultation with and approved by Dubbo Regional Council.
Dubbo Regional Council (DRC)	22/10/2021	Email and phone discussion	Discussion presenting the consent condition and requesting DRC consider the project's proposed site access via Ungula Road, Wuuluman Road, Ilgingery Road. DRC response received confirming they are comfortable with the request limited to the estimate vehicle numbers in the previous revised letter without any additional road upgrades. They requested excessive dust be managed where it is generated on an as needs basis.

Potential impacts

The use of the Ungula Road, Wuuluman Road and Ilgingery Road during pre-construction phase is considered unlikely to result in impacts to the local road capability or condition. The vehicles accessing the site would predominantly be light vehicles, with the exception of the occasional flat-bed truck and trailer (or mobile drill rig) that would be required to travel to the site to complete the geotechnical investigations.

The potential impacts to nearby receivers associated with the use of the access points are expected to be low. Traffic movements on the Ungula Road, Wuuluman Road and Ilgingery Road would not increase in a regular way with periodic activities requiring additional vehicle movements interspersed with periods of zero additional vehicles due to

no site activities being undertaken. This is the predicted situation for the duration of the pre-construction phase (approximately 6 months duration).

There are not expected to be any conflicts with or disruptions to school bus routes given the low volumes of proposed traffic and the capability of the roads to handle light and heavy vehicles using the roads concurrently.

No road upgrades or traffic management would be required under this proposal.

An agreement to use the additional site access routes and points identified in this letter would enable UWF to conduct the pre-construction minor works in the safest and most practical manner, and with little impact to the road network or to nearby receivers and fundamentally is not a departure from any part of the publicly exhibited and consulted-upon Project.

Please don't hesitate to contact me to further discuss this request.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'M. Flower', is positioned above the printed name.

Matthew Flower
Senior Project Manager
CWP Renewables Pty Ltd

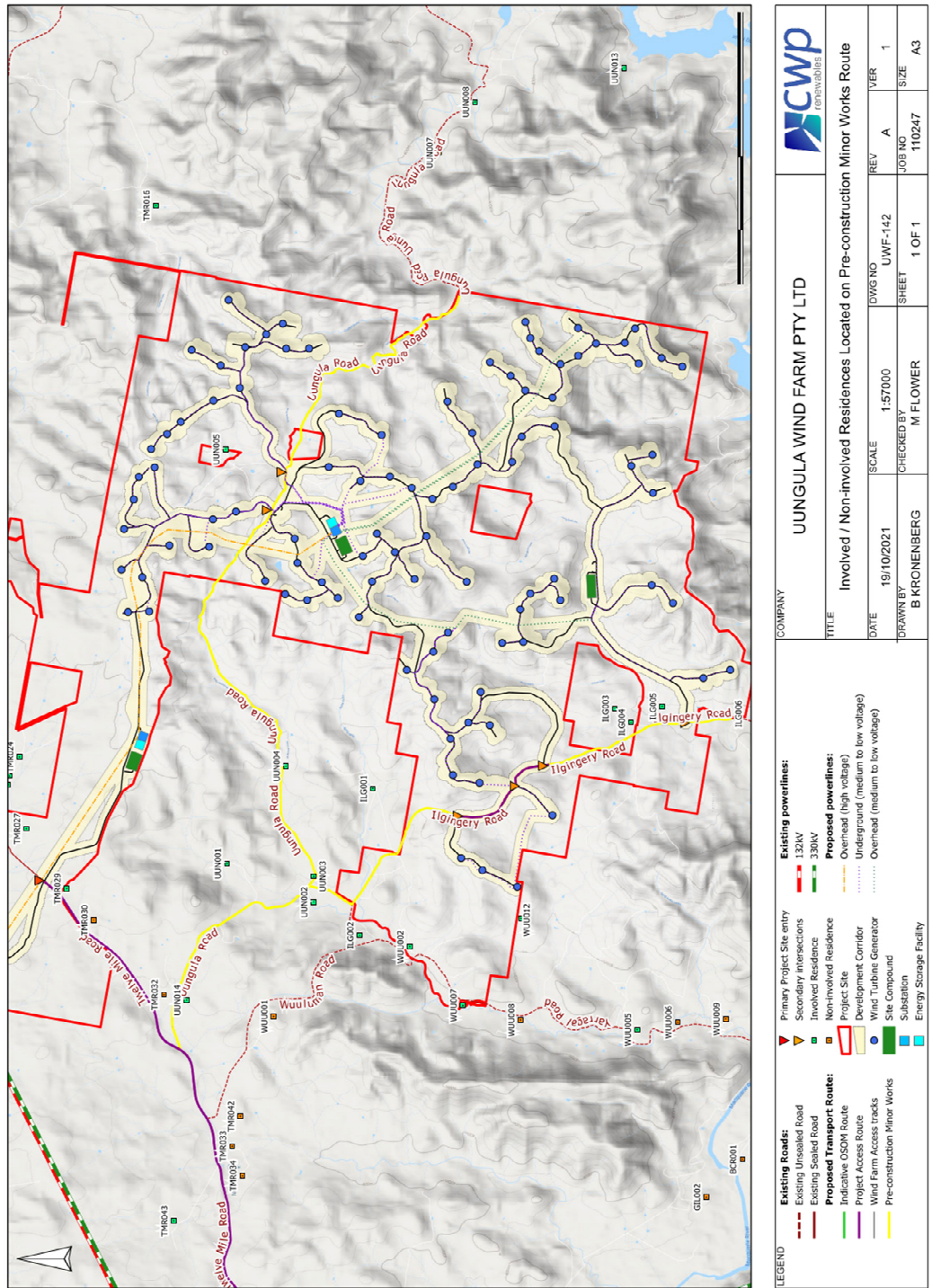
cwprenewables.com



LEGEND						COMPANY			
	Existing Roads:		Primary Project Site entry		Existing powerlines:	132kV			
	Existing Unssealed Road		Secondary Intersections		330KV				
	Existing Sealed Road		Involved Residence		Proposed powerlines:	Overhead (high voltage)			
	Proposed Transport Routes:		Non-Involved Residence		Underground (medium to low voltage)				
	Indicative OSON Route		Project Site		Overhead (medium to low voltage)				
	Project Access Route		Development Corridor						
	Wind Farm Access tracks		Wind Turbine Generator						
	Pre-construction Minor Works		Site Compound						
			Substation						
			Energy Storage Facility						

UUNGULA WIND FARM PTY LTD							
Transport Map (highlighting pre-construction minor works route)							
TITLE							
DATE	19/10/2021	SCALE	1:7'000	DWG NO	UWF-129	REV	C VER 2
DRAWN BY	B KRONENBERG	CHECKED BY	M FLOWER	SHEET	1 OF 1	JOB NO	110247 A3

Attachment 2 – Focussed map of proposed access routes / points showing residence involvement status



Attachment 3 – Consultation records

Method of consultation	Date	Content
Letters		
Targeted letter (residents of Twelve Mile Road (western end), Ilgingery Road, Wuuluman Road, Yarragal Road, Uungula Road)	12 December 2019	<p>Letter entitled "Uungula Wind Farm Twelve Mile Road Primary Project Site Access and Impacts" in a wide ranging latter on traffic and road use including a section stating scenarios of using particular roads 'Road Use' including the text below and accompanied by a map repeating this information.</p> <p>"To limit impacts to road users and the surrounding community, it is proposed that:...</p> <p>3. The sections of Uungula, Wuuluman and Ilgingery Roads linking the Project back to Twelve Mile Road will not be used by the Project during the post-Development Consent, construction or operational periods for any vehicles, except to:</p> <ul style="list-style-type: none"> • undertake Pre-construction Minor Works; • construct intersection upgrades on Uungula Road and Ilgingery Road; • undertake dust suppression; • utilise the secondary intersections and cross overs identified above to facilitate construction and operational vehicles; and • procure resources from licenced operators which are located along these roads."
Targeted letter (residents of Twelve Mile Road (western end), Ilgingery Road, Wuuluman Road, Yarragal Road, Uungula Road)	2 June 2020	<p>Letter entitled "Uungula Wind Farm Twelve Mile Road Primary Project Site Access and Impacts" in a wide ranging latter on traffic and road use including a section stating scenarios of using particular roads 'Road Use' including the text below:</p> <p>"To limit impacts to road users and the surrounding community, it is proposed that:...</p> <p>3. The sections of Uungula, Wuuluman and Ilgingery Roads linking the Project back to Twelve Mile Road will not be used by the Project during the post-Development Consent, construction or operational periods for any vehicles, except to:</p> <ul style="list-style-type: none"> • undertake Pre-construction Minor Works; • construct intersection upgrades on Uungula Road and Ilgingery Road; • undertake dust suppression; • utilise the secondary intersections and cross overs identified above to facilitate construction and operational vehicles; and • procure resources from licenced operators which are located along these roads."
Community Consultative Committee (CCC) meetings		

Method of consultation	Date	Content
CCC meeting	24 January 2020	<p>Transport map presented (slide 2) showing the commitment of only Twelve Mile Road (western end) for all traffic with a note outlining exceptions to this.</p> <p>"The sections of Ungula, Wuuluman and Ilgingery Roads linking the Project back to Twelve Mile Road will only be used to:</p> <ul style="list-style-type: none"> • undertake Pre-construction Minor Works • construct intersection upgrades on Ungula Road and Ilgingery Road • undertake dust suppression • utilise the secondary intersections and cross overs identified above to facilitate construction and operational vehicles; and • procure resources from licensed operators which are located along these roads."
CCC meeting	6 May 2020	<p>Transport map presented (slide 8) showing the commitment of only Twelve Mile Road (western end) for all traffic with a note outlining exceptions to this.</p> <p>"The sections of Ungula, Wuuluman and Ilgingery Roads linking the Project back to Twelve Mile Road will only be used during the post-Development Consent to:</p> <ul style="list-style-type: none"> • undertake Pre-construction Minor Works • construct intersection upgrades on Ungula Road and Ilgingery Road • undertake dust suppression • utilise the secondary intersections and cross overs identified above to facilitate construction and operational vehicles; and • procure resources from licensed operators which are located along these roads."
Planning Documentation		
Environmental Impact Statement	May 2020	<p>Chapter 4 "The Site" has a section on access and in section 4.1.3.1 (p129) "Site access Limitations and Exceptions" contains the following:</p> <p>"The sections of Ungula, Wuuluman and Ilgingery Roads linking the Project back to Twelve Mile Road will not be used by the Project during the post-Development Consent, construction or operational periods for any vehicles, except to:</p> <ol style="list-style-type: none"> a. undertake Pre-construction Minor Works; b. construct intersection upgrades on Ungula Road and Ilgingery Road; c. undertake dust suppression; d. utilise the secondary intersections and cross overs identified above to facilitate construction and operational vehicles; and e. procure resources from licensed operators which are located along these roads."

Method of consultation	Date	Content
Submissions and Submissions Report	September – November 2020	<p>Agency Submissions</p> <p>Dubbo Regional Council (DRC) submission proposed road upgrades along the whole length of those minor roads linking back to TMR. The Project Submissions Report (p19 and p25) describe CWP consultation with DRC (occurred on 6 August 2020 in a one-on-one meeting with DRC's Director Infrastructure) where DRC were advised that no OSOM haulage would use those roads but rather that they would be used for pre-construction minor works and that therefore upgrades to those sections of road were not essential to the Project. Those sections of the Submissions Report include description of the willingness for the Project to work with DRC in the future regarding those upgrades but that would be part of a Council-led infrastructure program because they are not required for the Project.</p> <p>TfNSW submission is detailed on p42 of the Submissions Report and includes concerns directing the restriction of access to the site via the western end of Twelve Mile Road using the redesigned intersection,</p> <p><i>"All <u>construction and maintenance vehicle access</u> and egress to the wind farm site from Goolma Road is to be via the upgraded intersection of Twelve Mile Road (west) and Goolma Road. Vehicular access via alternate routes between the site and Goolma Road are not permitted."</i></p> <p>There is also a request to review upgrade documentation, <i>"...showing passing bays to facilitate the safe passage of traffic generated by the proposed wind farm and existing background traffic. Specifically, the concept designs need to show lane widths, road pavement, location of passing bays and required works to facilitate the upgrade."</i></p> <p>The Project Submissions Report (p43) responds to the comment in the same manner as the DRC submission stating that those minor roads (not Twelve Mile Road) are not required for OSOM transport and will only be used for pre-construction minor works, therefore the upgrades are not warranted.</p> <p>Public Submissions</p> <p>No public submissions were made regarding the Project's use of those roads.</p>
Amendment Report	November 2020	<p>The Project Amendment Report includes a commitment (TM009) for "Traffic and Transport Impacts during Construction" that vehicles would access the site by TMR (western end) which is reflected in Condition B28, however it is relevant to note that the table relates to impact minimisation during construction.</p>
Presentations		
Dubbo Regional Council (Councillors and Senior Staff fortnightly workshop)	19 November 2020	<p>Presentation to DRC on Project status including presentation on traffic road use and upgrades. Included the same plan and minor roads use exception as outlined in the CCC meetings.</p>