

25 March 2026

Gabrielle Allan  
DA Coordinator  
Department of Planning, Housing, and Infrastructure  
*Electronically: NSW Major Projects Planning Portal*

Dear Ms Allan

**RE: Submission in response to Modification #2, Yanco Delta Wind Farm (SSD-41743746)**

Spark Renewables Pty Ltd (Spark Renewables) provides the following submission in response to the Yanco Delta Wind Farm (YDWF) Modification 2 (SSD-41743746) (Modification 2) submitted by Origin Energy Power Limited (Origin). Spark Renewables is the developer and owner of the Dinawan Wind Farm (DWF), an adjacent project and access rights holder in the South West Renewable Energy Zone (South West REZ). The DWF has lodged a Development Application, Response to Submissions and Amendment Reports with the NSW Department of Planning, Housing and Infrastructure (DPHI) and is currently in the assessment phase. YDWF and DWF are expected to have overlapping interfaces, particularly in relation to McLennons Bore Road, Goolgumbula Road and transmission infrastructure.

Spark Renewables is committed to engaging constructively with Origin, EnergyCo and DPHI to support the orderly and efficient delivery of renewable energy projects in the South West REZ, including through cooperative planning that reduces impacts on landowners, communities, biodiversity and shared transport corridors. In that context, Spark Renewables' comments are limited to those aspects of Modification 2 that may affect the development, construction access, infrastructure interfaces and operation of DWF. The purpose of this submission is to ensure those interfaces are appropriately identified and managed through the assessment of the modification.

Spark Renewables notes that Modification 2 introduces changes to the previously approved YDWF layout and disturbance footprint that, in its current form, create additional interactions with DWF. Spark Renewables requests that these interactions be appropriately assessed and that, if the modification is approved, suitable conditions be imposed to require consultation, coordination and detailed design refinement where necessary to avoid or minimise impacts on adjacent projects and shared corridors.

Further detail and recommendations are provided in the following areas:

**1. Use of McLennons Bore Road Corridor for Transmission Line**

The following statement is taken from the YDWF Modification Report in section 3.5.2.1 on page 72:

*"The extent of existing vegetation within the road reserve posed a constraint in trying to identify an appropriate transmission route to Transgrid's Dinawan 330 kV substation via McLennons Bore Road.*

*An options assessment identified two potential options to address these issues:*

- *Option A: Construct transmission lines within the road reserve area and adopt a build above canopy solution to minimise impacts. Revegetate temporary construction areas post construction where practical.*
- *Option B: Move the transmission line onto private property to the south of the road area with a fully cleared easement but co-located with existing fire breaks to minimise vegetation impacts.*

*The Project was unable to obtain landholder consent from the private property to the south of McLennons Bore Road. Accordingly, Option B was excluded as a viable option and does not form part of the modification application. Option A has therefore been progressed for inclusion in the modification.”*

Spark Renewables is aware of community concern that the use of McLennons Bore Road for a transmission route will impact established mature native vegetation within the road corridor. Concerns have also been raised about traffic and safety along Cadell Road.

Community members had proposed that Origin use the already cleared fire break on private property south of McLennons Bore Road (i.e. Option B).

Spark Renewables refers DPHI to pages 316-319 of the Biodiversity Development Assessment Report, which shows that the project surveyed the landowner’s land to the south of McLennons Bore Rd and the east of Cadell Rd.

Spark Renewables and (we understand) the DWF host landowners remain open to consultation with Origin to enable the YDWF project to assess the alternate transmission line options that would reduce/avoid impacts on native vegetation within the public road corridor.

## **2. Construction Impacts on McLennons Bore Rd**

Spark Renewables notes that the originally approved transmission line footprint for YDWF along McLennons Bore Road was materially smaller than the footprint now proposed under Modification 2. Further, Modification 2 contemplates substantially larger construction work areas (from “10 metre radius around each pole, 400 metres apart” to “a 50 metre by 80 metre construction area”) and indicates that “partial short-duration closures” or “full closures of McLennons Bore Road” may be required during construction, with arrangements to be confirmed during detailed design.

McLennons Bore Road is a key access route for DWF, including for over-size over-mass and heavy vehicle access. Spark Renewables is concerned that the modification material does not yet provide sufficient clarity regarding the likely extent, duration and practical implications of works within the McLennons Bore Road corridor, including any potential impacts on road pavement, access continuity and overlap with the DWF development footprint associated with proposed road upgrades (examples are shown in Figure 1 and Figure 2). As currently described, those matters make it difficult to fully assess the implications of the proposed modification on DWF.

Spark Renewables therefore requests:

- further detail regarding the nature and extent of the proposed construction footprint within the McLennons Bore Road corridor;
- further clarification regarding the likely timing, duration and traffic implications of any road closures, restrictions or detours;
- consultation with Spark Renewables during preparation of the Traffic Management Plan and any other relevant management plans dealing with McLennons Bore Road; and
- a condition of consent requiring consultation and coordination between the proponents in relation to access, road occupancy, traffic control measures and timing of works where those matters may affect DWF.

Spark Renewables also notes that the modification material is not clear as to the extent to which McLennons Bore Road would be used for YDWF-related construction traffic associated with the transmission connection. Greater clarity on this point would assist in assessing and managing the interface between the two projects.





Figure 1: Proposed disturbance footprint from YDWF transmission line in Modification 2 overlapping with DWF proposed upgrades to part of McLennons Bore Rd. The modification tower locations have been estimated based on the publicly available information.

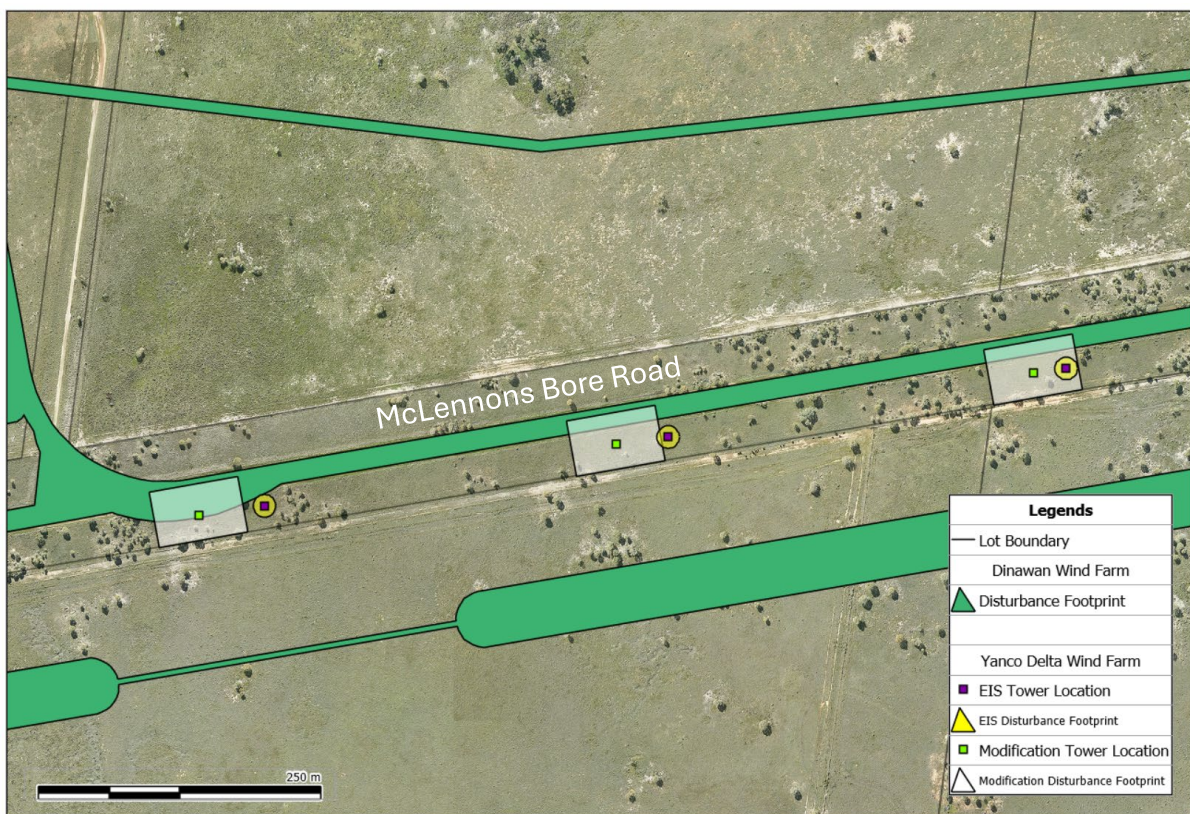
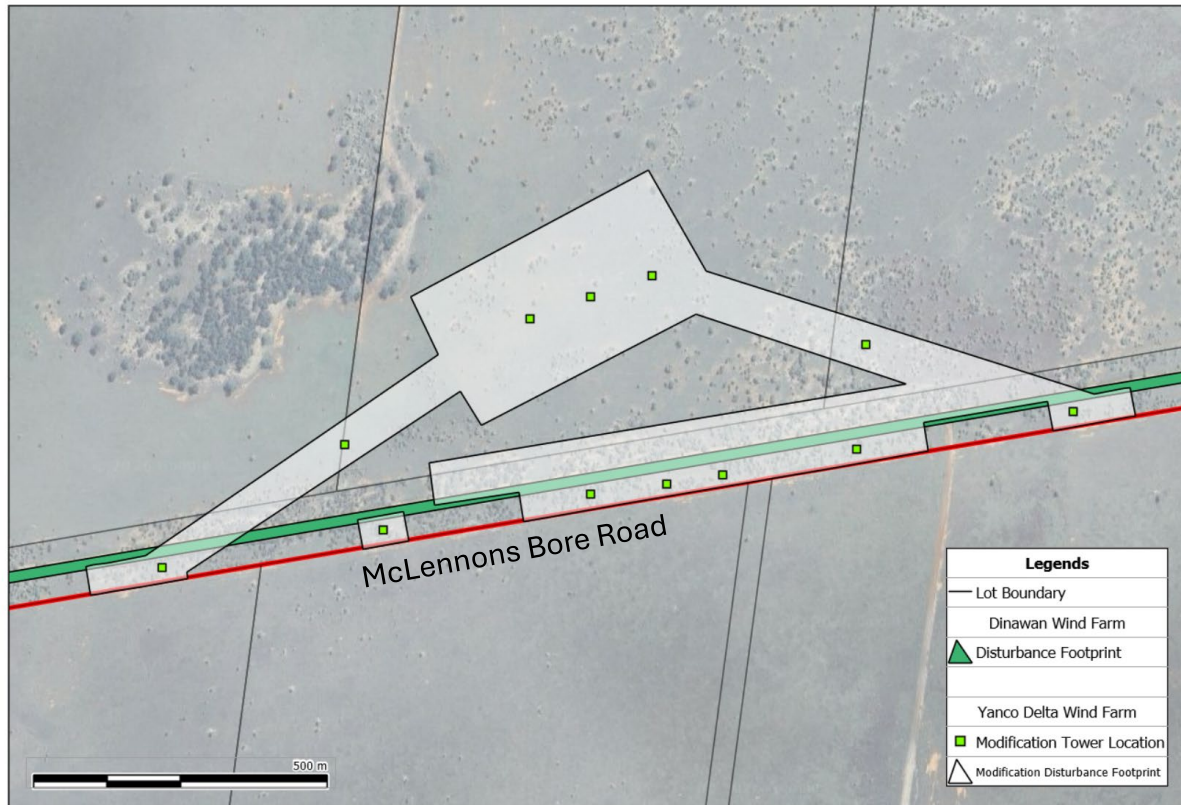


Figure 2: Proposed amendments to the approved YDWF infrastructure causing interactions with DWF access routes. The modification tower locations have been estimated based on the publicly available information.



Modification 2 has identified a section of McLennons Bore Road where the disturbance footprint extends on both the northern and southern side of the road pavement (Figure 3). Tower locations are proposed on the southern side of McLennons Bore Road, however, no information is provided on the nature of the impact on the northern side of the road.

Spark Renewables requests additional information regarding the reason for disturbance on the road pavement and northern side of McLennons Bore Road so it can assess the implications for DWF.



*Figure 3: Disturbance footprint identified on northern and southern side of McLennons Bore Rd. The modification tower locations have been estimated based on the publicly available information.*

### **3. Infrastructure and access interfaces within McLennons Bore Road Reserve**

Spark Renewables has proposed site access points for DWF along McLennons Bore Road, which were realigned (DWF Amendment Report #1) to avoid interactions with YDWF's approved transmission line towers. This was considering potential interactions with DWF OSOM deliveries, and as requested by Origin in their submission on the DWF EIS.

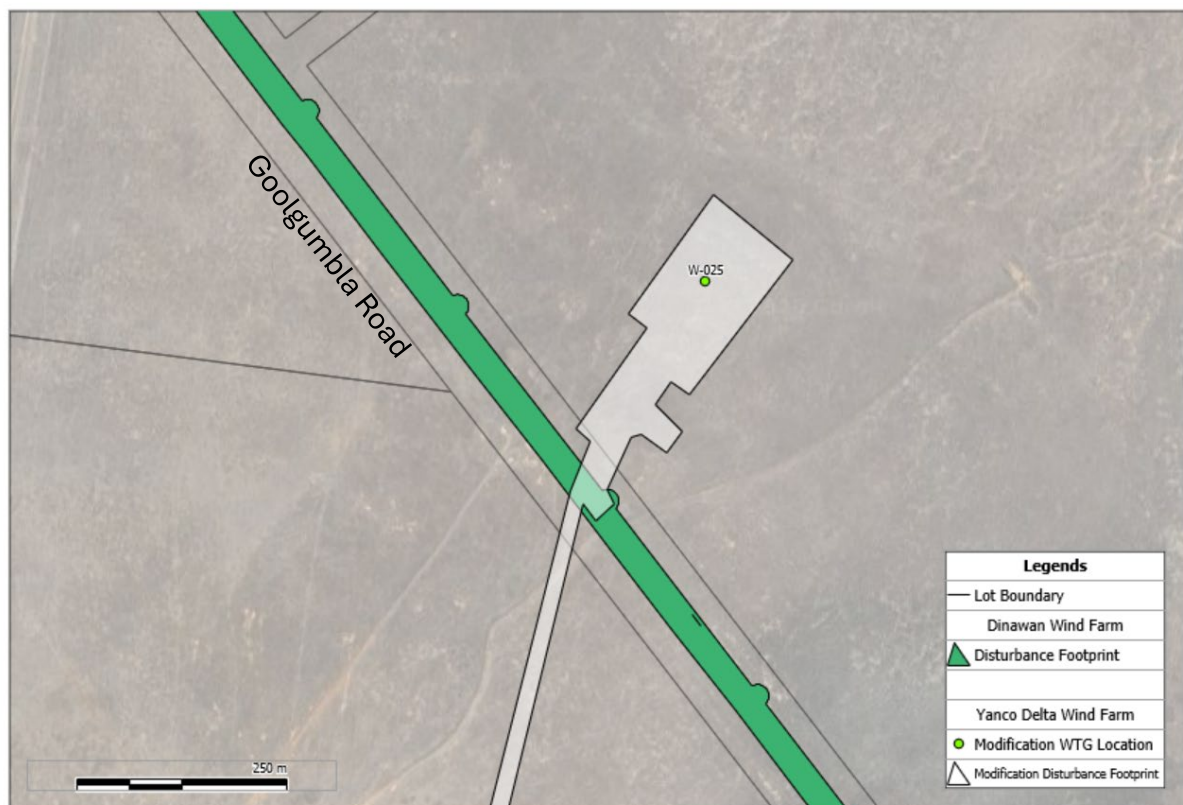
The Modification 2 has not taken into consideration the DWF site access points along McLennons Bore Road when proposing alternative transmission tower locations. Origin proposes an amended disturbance footprint that overlaps with the development footprint for DWF. An example is shown in Figure 2 (see western-most YDWF Modification Tower Location).

**Spark Renewables requests that this transmission tower location be reviewed as part of the assessment of Modification 2 and that minor refinements and tower micro-siting be considered to avoid overlap with DWF access points and the swept path allowed for in the development footprint.**

#### **4. Accessing and Crossing Goolgumbbla Road**

Modification 2 does not identify use of Goolgumbbla Road for YDWF-related traffic. DWF relies on use of Goolgumbbla Road to access the western portion of the DWF site. We note that the YDWF revised disturbance footprint includes an access point disturbance polygon onto Goolgumbbla Road southwest of YDWF turbine W-025. The nature of the impact of Modification 2 on Goolgumbbla Road is unclear and, in the absence of additional information, Spark Renewables requests that access along Goolgumbbla Road is not inhibited by disturbance related to YDWF at this location.

We note that YDWF's wind turbine W-025 is located north of Goolgumbbla Road. We request clarity on how this wind turbine will be accessed. We assume it will be accessed via the YDWF disturbance footprint by crossing Goolgumbbla Road. If so, crossing Goolgumbbla Road should be coordinated with the DWF.



*Figure 4: Disturbance footprint across Goolgumbbla Road*

#### **5. Distance of W-025 to Goolgumbbla Road**

YDWF wind turbine W-025 is located 240m from the Goolgumbbla Road reserve. This is both a public road and provides vehicular access to the western portion of DWF. The transmission connection from the western portion of DWF to Dinawan Substation is also proposed along this road corridor.

Spark Renewables requests that turbine W-025 be micro-sited further away from the road corridor of Goolgumbbla Road to a total set back distance of 110% of the installed tip height to address safety and avoid potential constraints on the road corridor.

## **6. Transmission Line Crossings**

There are points at which high voltage overhead transmission infrastructure from both projects interact. Due to the need for ongoing refinement of infrastructure to manage interactions between the two projects, micro-siting of infrastructure for both projects may be required at a later time, and as such Spark Renewables requests that provision is made for accommodating such micro-siting requirements in the conditions of consent.

If DPHI is minded to approve Modification 2, Spark Renewables requests that its approval includes a requirement for consultation and coordination between the proponents in relation to transmission line crossings, clearance requirements, construction sequencing and any necessary micro-siting or detailed design refinement to safely and efficiently accommodate both projects.

### **Conclusion**

Spark Renewables' comments are made for the purpose of ensuring that the interfaces between YDWF and DWF are appropriately recognised and managed through the assessment of Modification 2. They are also directed towards ensuring that DPHI considers the impact of Modification 2 proposing McLennons Bore Road for the construction of transmission lines in the context of both landowner and Spark Renewables' willingness to work with Origin in respect of a transmission route that utilises private property south of the road area.

Spark Renewables remains supportive of coordinated development within the South West REZ and requests that DPHI ensure the modification, if approved, includes suitable requirements for consultation, coordination and detailed design refinement so that impacts on adjacent projects and shared corridors are avoided or minimised.

Sincerely,

A handwritten signature in black ink that reads "Anthony Marriner". The script is cursive and fluid, with the first letters of each word being capitalized and prominent.

Anthony Marriner  
Chief Executive Officer, Spark Renewables