

“Umagarlee”

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Mr Iwan Davies

Uungula Wind Farm Planning Officer,

NSW Department of Planning

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Dear Mr Davies,

RE: UUNGULA WIND FARM _ SSD 6687

Submission in response to the E.I.S proposal for CWP Pty Ltd at Wellington. Uungula Wind Farm by the Wellington Branch of NSW Framers Association on behalf of the Users of Twelve Mile Road.

The subject matter of this submission was taken from the minutes of a meeting held at Wellington Soldiers Club on Thursday 13th February 2020 and convened by the Wellington Branch of NSW Farmers Association. No further meetings have been held since the EIS came out during Covid19 restrictions.

The meeting attended by CWP representatives was called to discuss the Uungula Wind Farm proposal by CWP PTY Ltd. and the affect construction would have on The Twelve Mile Road.

This road is approx. 50 km long, it starts at Cadonia Corner off the Goolma Road approximately 5 km from the Mitchell Highway. The first 23 km is bitumen and the rest is unsealed.

Side Roads: on the North side there are two side roads existing on the Goolma Road.

1. Gunnegalderie Road
2. Uamby Road
3. The Twelve Mile Road ends in a Tee with the left-hand branch travelling over the Cudgegong River a further 15km onto the Mudgee/Wellington Road the Eastern side of Goolma. The right-hand fork continues around the Cudgegong River and is a semicircular road travelling just North of Burrendong dam and re-joining the Twelve Mile Road closer to Wellington at Hollands property, “Uungula”.

On the Right or South Side of the Twelve Mile Road there are 3 unsealed roads servicing properties between Twelve Mile Road and Burrendong dam. One of these has a branch which allows access to Wellington town over a fair-weather stone crossing over the Macquarie River.

Twelve Mile Road users were concerned that road upgrades as a result of the development and road closures or stoppages during transporting wind farm tower components would affect.

1. Their ability to go to town (Wellington/Dubbo/Orange) when they wanted to.
2. Access for emergency vehicles such as ambulance, Fire trucks and Police.
3. Their ability to carry on the business of primary production (the only reason for them being there). If trucks bringing their supplies (Fuel, gas, Stock Feed, Structural improvements, mail) or trucks dispatching farm produce (grain, livestock, wool) were forced to stop travelling for a period of time and as a consequence created an animal welfare issue with live stock or influenced the carrier to refuse further trips because of the inconvenience and financial loss.

This submission is not about whether the wind farm should be supported or opposed since some of our members are participants, some are affected adversely and some are indifferent. This is strictly about concerns related to stoppages during construction and road upgrades.

At the above meeting Matthew Flower, CWP Renewables – Development Manager was asked whether there would be road closures either during upgrades (necessary for the vastly increased volume & usage of traffic) or during construction. He categorically stated that there would be NO road closures, that CWP would maintain a single carriageway at all times. However, announcements since then have qualified those remarks leaving road users uncertain of the affect the project will have on their life style and their businesses.

It needs to be stated at this point that irrespective of where a stoppage occurs in some cases there is no way of getting to town and in other cases the route to town will be much longer and probably much rougher.

For convenience this submission is divided into sections.

- I. **Access from Eastern End of Twelve Mile Road**
- II. **Proposed Changes to Cadonia Corner the main entry of windfarm traffic onto the Twelve Mile Road**
- III. **Lack of detail on road alterations the Mechanism's and on the traffic management plan**
- IV. **Conclusions Summary**

I. ACCESS FROM THE EASTERN END OF TWELVE MILE ROAD:

On page 339 of the EIS it states

“The primary project site will only be accessed from a westerly direction (from Goolma Road along the Twelve Mile Road), except to allow local services &/or resource suppliers located east of the primary project site entry along Twelve Mile Road the opportunity to participate in the project. Therefore, AN EXCEPTION (SIC) IS SOUGHT TO NOT PROHIBIT HEAVY AND LIGHT VICHICLES TO USE TWELVE MILE ROAD EAST OF THE PRIMARY PROJECT SITE ENTRY SHOULD SERVICE AND/OR RESOURCE SUPPLIERS BE IDENTIFIED”

We totally oppose this proposition for the following reasons

In appendix L (SARSA Consulting) pp23 and 25 it is assumed that construction staff traffic distribution would be split equally between the east (Gulgong-Mudgee area) and west (Wellington – Dubbo area) resulting in 120 construction staff vehicle movements twice / day (200 during peak staffing periods).

In addition, on P25 – Total light vehicles per day trying to access the project site from the east would be 240/day rising to 400 in peak periods (as above) and 96 heavy vehicles and an as yet unknown number of OSOM vehicles.

CWP in its EIS is seeking to direct this traffic down a path east of the project entrance 13.5km east at “Cadonia” corner.

There are three ways for any traffic to access the Twelve Mile Road East of the project site.

- A. The unsealed 25km of Twelve Mile Road entering from Goolma Road at Cudgegong River bridge on the Mudgee – Goolma Road, this section of road is only 1 carriage way wide, has rocks and trees encroaching on both sides and in some cases cliffs on one and both sides. Visibility is limited to 40-50 metres in some areas and the road surface is “Rough”.

One property owner who liked Jaguar cars had to trade his in every 12 months because of the damage to the undercarriage of the car caused by the road and rocky surface. We would insist that this road is unsafe for the volume and style of traffic proposed by CWP and should not be used.

- B. Uamby Road – this is a narrow, unsealed road exiting Twelve Mile Road 5 km east of “Glenwood” homestead. It services Uamby residents and several other properties on route to Goolma. It is most unsuitable and unsafe for the proposed traffic as above.
- C. Gunnegaldrie Road – This is an unsealed road of approx. 8km through the property of the same name and extends from near the “Glenwood” Homestead to the Goolma Road opposite the property of “Ahawanee”. It was designed for use by the owners of Gunnegaldrie in running their property and was later used by a small number of locals as a short cut if going to Goolma or further East.

The road is only one carriage way wide and cars and utes have to get off the road if a truck is approaching from the other direction. In places there are small cliffs on both sides – one up and one down prohibiting such manoeuvres.

If two trucks approached in the more hilly sections of the road one would have to back up maybe several hundred metres – a difficult and sometimes impossible and dangerous task.

In addition, due to the reason for the road in the first place there are three houses; two right on the road and another 50 metres from the road, a woolshed, two cattle yards.

The volume of traffic proposed, if it should travel by this route would destroy the lifestyle of the house occupants – some with young children, disrupt the orderly running of the property e.g. when mustering sheep and cattle to the yards and pose a threat to the users of the road since it is not fenced off and stock frequently “camp” on the road.

The present casual usage by neighbours is a big enough problem but a manageable one. We contend that this road is quite unsuitable and unsafe for the proposed volume of traffic.

Irrespective of how the proposed traffic travel to the sealed section of Twelve Mile Road east of the project entrance there are three properties which the Twelve Mile Road dissects – “Umagarlee”, “Meramie” and “Glenwood”. Before the road was sealed and fenced the unsealed road ran through the paddock.

All these properties run stock across the road for management purposes at irregular intervals. Sheep usually cooperate but cattle can take 15-60 minutes depending on their disposition at the time.

A conga-line of traffic appearing at this time would have to stop and wait and their mere presence could expectedly lengthen the delay if the stock were apprehensive because of their being there.

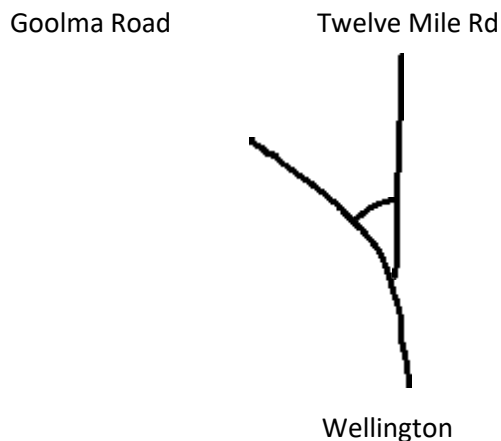
At the moment the frequency of traffic allows this and is mainly neighbours and residents of Twelve Mile Road who have local knowledge.

One owner drives heavy equipment – bulldozer, excavator and occasional tractor with up to 4 trailing devices behind across the road at irregular intervals.

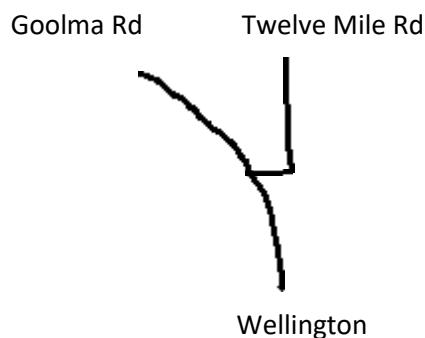
For all the above reasons we would like to insist that the development consent for the project be dependent upon ALL wind farm traffic coming on the Goolma road NOT be allowed to enter or exit on the Twelve Mile Road at any point, other than “Cadonia” Corner.

II. **Proposed changes to “Cadonia Corner” the major entry of Windfarm traffic onto Twelve Mile Road.**

This corner and proposed changes to it has a long history. The corner is shaped as below and various road authorities have tried to convert it into a T-Section



About 50 years ago the Authorities closed off the 100Metre straight section leading onto Goolma Road towards Wellington and FORCED traffic both ways to use an intersecting track to make it a T-section.



Very soon the school bus from Twelve Mile Road just avoided an accident with a large truck. This could have killed or severely injured all the school children from Twelve Mile and Wulluman travelling on the bus. There were men from the roads authority responsible for the changes present at the time and they were so shocked at the near accident that they opened up the straight section again immediately.

Then about 35 years ago the Wellington shire council did the same thing. It closed off the straight section of Twelve Mile Road corner with a barrage and forced vehicles to use the intersecting track. The residents of Wulluman using the road immediately convened a meeting on site. It consisted of 50-60 people who used the road. Representatives of the council were present and when one resident whose property adjoined the intersection

related the above the story re the school bus the Shire engineer at the time immediately ordered the removal of the barrages and the intersection returned to its previous state.

About 8 years ago the then RMS sent out a circular to the users of Twelve Mile Road informing them of their intention to convert the intersection to a classic "T-Intersection" and called a meeting of interested residents on site. 50 + attended and there were two RMS personnel from Sydney present and after listening to all the comments from residents announced that any decision was not theirs to make and the matter would be referred to a "committee" in Sydney to decide. Three months later we heard that the intersection was to stay as it was.

Subsequently some works were carried out on the intersection including bitumening the Intersecting track and provision of a "sort of stopping lane" for the vehicles entering Twelve Mile Road from Wellington.

There seems to be a fetish by authorities on having all intersections as a T-intersection". However all the "T-intersections" we have seen occur on level (not steeply cambered) roads with adequate visibility and with the major road straight not serverly curved.

Conversly the "Cadonia Corner" (Cadonia being the name of the property where this occurs) joins a straight minor road with a very curved major road which is serverly cambered to stop trucks doing 100KPH from rolling on the bend.

In addition visibility towards Goolma is barely 250metres (not measured by us but by road authorities). Needless to say a vehicle travelling at 100KPH will only take 9 seconds from being observed to the intersection site. This may be enough time for a light vehicle which has started to move before the truck appears to safely turn into the intersecting road however trucks and especially a B-Double truck starting from scratch and on a steep left hand slope (due to the camber) when there is no on coming traffic and suddenly one comes into view would have no hope of clearing the intersection in 9 seconds.

If the oncoming truck braked to avoid a collision it is very doubtful if they could stop in time to AVOID a collision and if they did brake suddenly there is likely to be a pile up of vehicles behind them. None of these circumstances are likely to occur on a classic straight type intersection with no severe camber.

We would like to address the EIS proposal for changes to "Cadonia Corner" as set out in the "I-Cubed appendix N."

This proposal appears to be a "hybrid" soloution pandering to the penchant of Roads Authorities for classical "T-Intersections" and still allowing CWP to build their wind farm. It would be more believeable if it recommended the OSOM vehicles enter Twelve Mile Road by the tortuous route suggested for Twelve Mile Road users instead of the straight road ahead as appendix N proposes.

i. Entering Twelve Mile Road from Wellington

Instead of the “i-cubed” recommendation of a dangerous right angle turn into the intersecting track we propose the deceleration lane in the appendix N be moved towards Wellington 100metres (the length of the straight section on Twelve Mile Road). In addition users of the Twelve Mile Road have complained to us that the through lane on the left (North) needs to be wider to allow the through traffic to proceed towards Goolma. There is ample room for this and visibility is greater to 350metres. Merging traffic is always safer than crossing the oncoming lane of traffic.

ii. Exiting Twelve Mile Road towards Wellington

Road users have all recommended that there be an accelerating lane to the left (Sth) side of the through traffic lane to allow vehicles to gain enough speed before joining the traffic. There is plenty of room for such a lane.

iii. Entering Twelve Mile Road from Goolma

The “i-cubed” report has recommended a deceleration lane to the left (Sth) of the through traffic lane and a rounding off of the corner leading into the intersecting track. We agree with this but stress that the deceleration lane be level not a continuation of the severe camber on the major road (Goolma Rd). There is plenty of room for this lane.

iv. Exiting Twelve Mile Road towards Goolma

No matter how this turn is approached it will always be the most dangerous procedure at this intersection. This is because the major road is severely cambered to the North, is on a significant curve and because visibility towards Goolma is only 250metres. The visibility problem could be made less dangerous by signage both in the road surface and standing signs either limiting speed to 60 or 80KPH or indicating “Turning Traffic” and demanding SLOW DOWN.

Historically 60 and 80 KPH restriction signs on the open road tend to be ignored to a large extent but there needs to be some signage warning for Wellington bound traffic of the impending danger.

Appendix N does not recommend an acceleration lane for vehicles proceeding towards Goolma to gain some speed before merging with Goolma bound traffic. It does have an area marked as below which could be the start of an acceleration lane which our advice indicates should ideally be 500metres.



Certainly, it would not be much use if it did not travel the 250metres to the top of the adjacent hill. There is plenty of room on the roadside for this very important addition to the intersection.

The recommendations listed above come from the residents and users of Twelve Mile Road and were referred to the RMS personnel who advised and concurred with the above suggestions.

Regarding the “I-cubed” proposal for Wellington traffic Twelve Mile Road bound to pull up in the middle of the road and turn into the intersecting track NSW Farmers in representing the views of the Twelve Mile Road Users has found not one person who wished to see that particular “I-Cubed” recommendation acted upon. In addition, opinion from the same or similar road users over the past 50 years has unanimously rejected that or similar proposals.

Therefore, NSW Farmers Association would like it to go on record that if Authorities ignore our request and proceed with this dangerous proposal the Association will do everything that needs to be done to see this particular proposal scrapped.

Given the above arguments we would like to insist that Development Consent be dependant upon this intersection being properly upgraded to cope with the vastly increased volume and style of traffic and that under no circumstances do the users of Twelve Mile Road end up with a dangerous quasi T-section entry into the intersection track instead of a straight run into the Twelve Mile Road as it is now.

III. Lack of detail on road alterations and the Mechanism's and on the traffic management plan

At the public meeting on the 13th February 2020 Matthew Flower stated that "the road will not be closed and one carriage way will always be open"

Subsequent announcements have morphed into "only temporary interruptions during upgrade works may apply" CWP May 2020 community newsletter.

The appendices by consultants do not address in detail the scope of necessary road alterations to cope with the vastly increased volume of traffic and the need for OSOM vehicles. Therefore, Twelve Mile Road users are left guessing as to "How long is temporary?" – 5 minutes – 5 hours or 5 days?

How do rolling stoppages work? It would be nice to see the traffic plans in detail.

It should be noted that public utilities carrying out road alterations always leave one carriage way open at all times.

Not only do the above-mentioned appendices not address detail yet they refer to the need for tree lopping and tree removal and structural road alterations. All this leaves the users of Twelve Mile Road anxious to see exactly what is proposed to gauge the affect on them and their business profitability and even viability. The present partial support for this proposal will evaporate if Twelve Mile Road users find their businesses strangled by this proposal.

Therefore, on behalf of the Twelve Mile Road users we request the Department of Planning to hold over of this proposal (i.e.; interim approval only) until CWP provide a detailed road alterations plan and traffic management plan.

If, as requested by CWP, approval is given and then CWP prepares the road alteration and traffic management plans where is the mechanism for Twelve Mile Road users to change the alteration and traffic management plans if necessary or to lobby for approval not to be given for the project because the affect of the above?

The request by CWP for approval first and then the details is presumptuous in the extreme and says (to paraphrase the musical Lil Abner) "what is good for CWP is good for Twelve Mile Road users!"

IV. Conclusion Summary

In regard to access from the eastern end of Twelve Mile Road.

WE WOULD LIKE TO INSIST THAT DEVELOPMENT CONSENT FOR THIS PROJECT BE DEPENDANT UPON ALL WIND FARM TRAFFIC COMING VIA GOOLMA ROAD NOT BE ALLOWED TO ENTER OR EXIT THE TWELVE MILE ROAD AT ANY POINT OTHER THAN "CADONIA CORNER".

IN REGARD TO PROPOSED CHANGES TO CADONIA CORNER – THE MAJOR ENTRY OF WINDFARM TRAFFIC INTO TWELVE MILE ROAD.

WE WOULD LIKE TO INSIST THAT DEVELOPMENT CONSENT BE DEPENDANT UPON THIS INTERSECTION BEING PROPERLY UPGRADED TO COPE WITH THE VASTLY INCREASED VOLUME AND STYLE OF TRAFFIC AND THAT UNDER NO CIRCUMSTANCES DO THE USERS OF TWELVE MILE ROAD END UP WITH A DANGEROUS QUASI T-SECTION ENTRY INTO THE INTERSECTION TRACK INSTEAD OF A STRAIGHT RUN INTO TWELVE MILE ROAD AS IT IS NOW.

IN REGARD TO LACK OF DETAIL ON ROAD ALTERATIONS AND THE MACHANICS AND ON THE TRAFFIC MANAGEMENT PLAN.

THEREFORE, ON BEHALF OF THE TWELVE MILE ROAD USERS, WE REQUEST THE DEPARTMENT OF PLANNING TO HOLD OVER THIS PROPOSAL (IE INTERIM APPROVAL ONLY), UNTIL CWP PROVIDE A DETAILED ROAD ALTERATIONS PLAN AND TRAFFIC MANAGEMENT PLAN.

Yours sincerely,

Peter Carter

Chairman Wellington Branch,

NSW farmers Association