

BM:LD:AA | SSD-52217961

18 January 2023

Attention: Julia Green
NSW Department of Planning, Industry and Environment
4 Parramatta Square, 12 Darcy St
PARRAMATTA NSW 2150

Dear Julia,

SUBJECT: DAPPER SOLAR FARM (SSD-52217961)

Thank you for providing Mid-Western Regional Council (Council) with the opportunity to provide comment on the Secretary's Environmental Assessment Requirements (SEARs) for Dapper Solar Farm (SSD-52217961). Council has reviewed the documents and provides the below comments.

1. In the EIS, Council requests that all State Significant Development (SSD) projects (including non-renewable energy projects) situated in the Central West Orana Renewable Energy Zone are considered and included in the assessment of Cumulative impacts. There are many projects that will be constructed and operating at the same time as the proposed Dapper Solar Farm that have not been identified or considered in the Scoping Report.
2. In the EIS Workforce impacts should be considered in relation to all SSD projects that are proposing to utilise the same temporary accommodation in Dubbo, Mid-Western and Warrumbungle local government areas. The Scoping Report notes there will be an estimated 350 workers during the peak construction period, which is expected to run for a period of approximately 18 - 24 months. The Report notes that proposed accommodation will be sourced from surrounding townships during this period. A number of other SSD projects have identified the same accommodation sources.
3. The Scoping report identifies the project is based within 30km of Dunedoo and around 60km east of Dubbo. It should be acknowledged and addressed in the EIS that the town of Gulgong is 33km from the site and Mudgee 52km.
4. As the Mid-Western Region LGA is impacted in terms of social influence (as noted in the Scoping Report) it is requested that:
 - a. Mid-Western Regional Council Strategies and Policies should be considered in a similar manner to Warrumbungle and Dubbo Regional councils.
 - b. Mid-Western Regional Council should be considered a key stakeholder for this project and should be engaged appropriately. To date, there has been no formal engagement with Council regarding this project.
5. Traffic and Transport also needs to consider cumulative impacts for the entire route of construction transport, not only local traffic surrounding the project. This should include impacts from Port to site.

6. Waste – A full detailed waste plan should be developed along with the EIS. It is to be noted that capacity for construction waste does not exist at this stage in the Mid-Western LGA. Gulgong and Birriwa are among the closest waste facilities to the site and are not landfill facilities. These sites only accept general residential type wastes such as household garbage, paper and cardboard. All material deposited at these facilities are transported to the Mudgee Waste Facility. The Mudgee Waste Facility currently has no capacity to take large quantities of material likely to be generated by the project as the capacity of the existing Waste Cell is almost exhausted.
7. Social / Economic Impacts – it is noted that for all potential project overlaps identified in the Scoping Report (Table 6-9), Social / economic is only identified to be addressed as a Standard Assessment. Council believes due to the size and number of SSD projects that are proposed to be under construction at the same time as this project, a Detailed Assessment (as identified in Table 6.8) is required for Social and Economic impacts.

Should you have any further enquiries in relation to this matter, please contact Council on (02) 6378 2850.

Yours sincerely,



SIMON JONES

ACTING GENERAL MANAGER