



MID-WESTERN REGIONAL COUNCIL
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Office of the General Manager

LP | LAN900123

14 August 2023

Natasha Homsey
NSW Department of Planning and Environment
Locked Bag 5022
PARRAMATTA NSW 2142

Dear Natasha,

SUBJECT: Advice on Environmental Impact Statement; Spicers Creek Wind Farm (SSD-41134610)

Thank you for providing Mid-Western Regional Council (Council) with the opportunity to comment on the Environmental Impact Statement (EIS) for Spicers Creek Wind Farm (**SSD-41134610**). Council has reviewed the documents and would like to provide feedback for consideration.

To note, The EIS notes Mid-Western Regional Council (neighbouring LGA) a key stakeholder. Mid-Western Regional Council have no records of consultation with the Proponent regarding the project since 2021 except for a letter in February 2023 stating Squadron Energy and CWP Renewables have officially combined.

This is frustrating as the project proposes to utilise accommodation and workers through the region. After reviewing the EIS, Council requested a meeting with the proponent, which took place w/c 8/8/23.

As noted above, the EIS has proposed that accommodation be sourced from surrounding towns, including towns within the Mid-Western Region, Mudgee, and Gulgong.

Council is strongly concerned with this aspect of the project. There is currently a severe shortage of appropriate accommodation in the region for tourism, caused by the competing demands placed on accommodation availability by State Significant Developments (SSD). What the proponent fails to address is that there are multiple projects within and surrounding the Mid-Western Region looking to construct at the same or similar time.

This shortage/competition will be particularly evident during the construction phase, which coincides with the peak construction periods of several other SSD projects in the region that are either approved or in the assessment/consultation phase. More projects are planned every day to meet the objectives of the Renewable Energy Zone, including:

- Wollar Solar (400 workers)
- Stubbo Solar Farm (520 workers)
- Barney's Reef Wind Farm (250 workers)
- Bellambi Heights BESS (100 workers)
- Birriwa Solar Farm (600 workers)
- Valley of the Winds Farm (800 workers)
- Central-West Orana REZ (Renewable Energy Zone) Transmission Project (workers 650-1800)
- Liverpool Range Wind (800 workers)
- Orana Wind (580)
- Bowdens Silver (320 workers)
- Coal Mine expansions (250 workers)
- Tallawang (525 workers)
- Narragamba (400 workers)
- Mayfair Solar (150 workers)
- Valley of the Winds (400 workers)
- Burrendong Wind Farm (250 workers)
- Yarrabin Pumped Hydro (500 workers)

In total, the projects above require a minimum estimated workforce of over 7495 workers, many of whom need to be housed in the Mid-Western Region LGA (Local Government Area).

The workforce and accommodation strategy should consider that Council strongly objects to the use of tourist and visitor accommodation for any construction workforce, and there is limited availability across all accommodation types in the Mid-Western region.

Further Feedback on the Environmental Impact Statement

5.2.1 Key Stakeholders

Council requests consultation be initiated and ongoing to ensure that Council and the community have current and accurate information about the project, and to provide feedback on the proposed project. As such, consultation should include the provided impact area, including Mudgee and Gulgong, where the proponent proposes to source and house workers.

6.8.2 Project Water Demand, Supply and Disposal

The EIS notes water demands for the construction phase of the Project (approximately 40 months) are estimated to be in the order of 80 to 120 ML. Proponents should not be relying on Mid-Western Regional Council as a source of construction or potable water supply. The proponent is required to be self-sufficient in this regard.

6.10.1.1 Assessment Results

The EIS notes the nearest planned wind farm project is Barneys Reef Wind Farm, proposed to be located approximately 18 km to the east. Council wishes to inform the proponent that Orana Wind Farm is the closest proposed wind farm and this and others must be taken into consideration for cumulative impact.

6.11.3.1 Construction Workforce

The EIS notes that there will be an estimated 590 FTE workers during peak construction, expected to last approximately 40 months. There will be multiple concurrent projects seeking to house construction workforces, with peak construction in the REZ likely occurring between 2023 and

2026. In addition, strain on accommodation services is already evident due to the large influx of seasonal and itinerant workers for mining and agribusiness and strong demand for temporary accommodation during peak tourism seasons (Christmas holiday period).

Council does not support the use of tourist and visitor accommodation for any construction workforce and requires a detailed accommodation and workforce strategy. Also note Christmas Holiday is not the peak tourism season in the Mid-Western Region and the peak construction in the REZ is likely occurring later than 2023. This needs to be taken onto consideration.

It is also requested that the Proponent consider the status and timing of all other state-significant developments within the Mid-Western Region to minimise any adverse cumulative impacts.

6.12.2.2 Labour Force, Occupational and Business Structure

The EIS notes the regional labour market is tight, highlighted by the Study Area's low unemployment rate of 3% compared to 5% for NSW as a whole. The Project is likely to require some 590 employees during the construction phase (at the Project's peak), with potentially 20% of the workforce sourced locally.

Considering the current unemployment rate in the Mid-Western Local Government Area (LGA), of 1.7%. Mid-Western Council requests more detail on how workers will be sourced for this project and their proposed route for commute to the work site.

6.1.3 Waste Management

Council would like to note that Mid-Western Regional waste facilities are NOT appropriate or capable to handle the disposal of landfill waste generated by the project. Gulgong Waste Facility is not a landfill facility, accepting mainly residential type wastes. All material deposited at Gulgong Waste Facility is transported to Mudgee's Waste Facility. The Mudgee Waste Facility has no capacity to take large quantities of landfill material likely to be generated by the project, as the capacity of the existing Waste Cell is almost exhausted. Other materials need to be discussed with Council prior to disposal.

Council requests the proponent provide specific details about the expected waste to be generated during each phase and how it will be managed. Further, a waste management plan is to be developed in consultation with Council if Mid-Western Regional Council services are to be utilised.

6.15 Cumulative Impact Assessment Summary

The EIS notes the projects identified as requiring further consideration as part of the cumulative assessments are outlined in Table 6.43.

Council would like noted that Orana Wind Farm, Narragamba Solar Farm, Mayfair Solar Farm, Yarrabin Pumped Hydro, Burrendong Wind Farm and two coal mine extensions are in the planning process and may need to be considered for cumulative impact.

6.7.2.1 Road Capacity

As the accommodation strategy has not been provided the project impact on roads is unknown. Council requests specific details regarding traffic movements, including light traffic in the Mid-Western LGA.

Mid-Western Regional Council does not support "park and ride" type purposes on public land due to insufficient car parking available in the region, and no public car parks or public road infrastructure are to be used for park and ride.

FURTHER CUMULATIVE IMPACTS

In addition to the above, Council wishes to ensure significant consideration of this proposal's cumulative impacts in conjunction with other approved and upcoming major projects in the region. The assessment should include, but not be limited to, the following cumulative impacts:

- Environmental impacts of the project, including but not limited to cumulative flora, fauna, and habitat loss, particularly impacts on threatened species, increased risk of grass fire escape and spread with loss of woodland communities, greater potential for bio-security impacts such as weed dispersal and new incursions on the site and surrounding agricultural areas, increased risk of feral animal incursion and impacts to stock, wildlife and human safety, groundwater impacts, contamination effects, waste disposal impacts, and cultural heritage impacts including Aboriginal and European heritage.
- Visual impacts of multiple renewable projects on private properties, important local features, and the public domain. This should encompass all State Significant Developments, not just wind projects.
- Land use conflicts resulting from multiple renewable projects in the area, which may impact primary production and rural-residential land uses.
- Transport and traffic impacts arising from multiple renewable projects on State, Regional, and local roads. This includes the significant increase in maintenance and resources required by the Council for project-related roads during both the construction and operation phases.
- Tourism impacts that affect local accommodation availability and the unique character of the Gulgong area. The area's appeal to tourists relies on its strong connection to heritage significance, scenic rural landscapes, and agriculture.
- Economic impacts, including effects on agricultural land availability, property devaluation, and reduction in the supply chain of local services and materials needed for other local construction projects.
- Acoustic impacts resulting from multiple renewable projects close to residents, as well as increased traffic movements.
- Social and amenity impacts the community with a large workforce, including unskilled workers temporarily located in the region to support the projects.
- Consideration of medical, educational, and other social service impacts should be considered.

If you have any further enquiries regarding this matter, please contact Council on (02) 6378 2850

Yours sincerely,



BRAD CAM
GENERAL MANAGER