



Office of the General Manager

LP | LAN900

25 June 2024

Cameron Ashe
Energy Assessment
Department of Planning and Environment
Locked Bag 5022
PARRAMATTA NSW 2124

Dear Cameron,

SUBJECT: SANDY CREEK SOLAR FARM ADVICE ON RESPONSE TO ENVIRONMENTAL IMPACT STATEMENT (SSD-41287735)

Thank you for providing Mid-Western Regional Council (Council) with the opportunity to comment on Sandy Creek Solar Farm Environmental Impact Statement (EIS), Council has reviewed the document and provides the following comments.

The EIS notes, Sandy Creek Solar farm has a proposed solar generation capacity of up to 700 MW and a BESS generation capacity of up to 700 MW/4 hours with a peak workforce of 350 FTE workers over a construction period of 22-28 months.

The EIS notes Mid-Western Regional Council (neighbouring LGA) a stakeholder with High interest and/or influence, however Council is on the inform list, not the consultation list.

This is frustrating as the EIS has proposed that accommodation be sourced from surrounding towns, including Gulgong and Mudgee within the Mid-Western Region and the Proponent has not consulted with Council in this regard.

Accommodation

Council notes inconsistencies in the Environmental Impact Statement and the Social Impact Assessment.

The EIS notes, a peak workforce of 350 workers and if a temporary workforce accommodation facility is required the capacity will be for up to 350 personnel.

The EIS also notes "it is estimated that 50% of the construction workforce will reside in the Project's accommodation facility located within the development footprint. The remaining 50% are anticipated to travel from their homes in Gulgong, Mudgee, Dunedoo, Dubbo, and surrounds. This allocation will be determined once all accommodation options are available and following further

consultation with communities about the preferred location of temporary workforce accommodation facilities.”

The EIS also notes, non-resident workers who choose not to stay in the accommodation facility will be encouraged to seek accommodation across surrounding towns to reduce the impact on any one locality.

The Social Impact Assessments (SIA) notes: While Lightsource bp will utilise the accommodation facility for most workers, some will require accommodation nearby. This includes Project personnel who may not wish to use the accommodation facility or **during peak workforce periods where the accommodation facility cannot accommodate all workers required.**

The SIA also notes, approx. 20% of construction, workforce (49 workers) sourced from local area (This equates to a total workforce of 242 workers)

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).

Council does not support the use of tourist and visitor accommodation for any construction workforce.

Council requests the mentioned Workforce and Accommodation Strategy be provided prior to the determination of the proposed development so a proper assessment can be made.

This strategy is critical to the project and needs to be completed and reviewed prior to determination.

Council also requested that the Proponent consider the status and timing of all other state-significant developments within and surrounding the Mid-Western Region to minimise any adverse cumulative impacts, including all Coal Mine expansions and Bowdens Silver Mine.

Water resources

The EIS notes, during construction, non-potable water required for the Project will be sourced via multiple groundwater bores within the development footprint. The bores are yet to be constructed. Water for construction purposes will also be opportunistically sourced from the following locations to minimise the need for imported water: • use from existing landholder dams where harvestable rights apply • reuse from construction sediment basins • reuse from rainwater tanks collecting runoff from building roofs.

Potable water is expected to be trucked in from a licensed source under commercial agreement, with the primary purpose of water supply to the temporary workforce accommodation facility and construction offices.

Council advises, the Proponent should not depend on Mid-Western Regional Council water sources directly or through third parties for construction or potable water, as the capacity to supply this does not exist.

Council requests prior to consent the proponent confirms suitable sources of potable and construction water.

Wastewater

The EIS notes, ablution wastewater generated on site during construction will be collected periodically for offsite disposal by a licenced waste contractor, as there is no sewer access at the site.

Council advice is that Gulgong, Rylstone, or Kandos Sewage Treatment Plant's (STP) do not have any facilities to receive septage or sewage collected/tankered from sites not serviced by the town sewage collection system. In the Mid-Western Region, Mudgee STP is the only site that can receive such tankered waste.

Mudgee STP has an existing septage disposal facility designed to receive up to 20KL/day of tankered sewage/septage. This facility has been designed to receive septage from Council's rural domestic customers. Mudgee STP has no capacity to accommodate additional loading of sewage at this point in time.

Council requests the proponent to identify suitable sewage disposal prior to consent

Waste management

The EIS notes, it is anticipated that the volumes of construction and decommissioning waste may exceed the capacity of the local waste facilities.

Council advises that none of its waste facilities are appropriate or capable of handling the disposal of landfill waste generated by Sandy Creek Solar Farm. The Mudgee Waste Facility has limited capacity to accommodate enormous quantities of landfill material likely to be generated by the project, as the existing Waste Cell is almost exhausted. All of Council's other waste facilities are waste transfer stations (including Gulgong) accepting residential waste only, which is then transported to Mudgee waste facility. They are not suitable to accept waste from this project.

Council requests the proponent provide specific details about how the waste generated during each phase of the project will be managed. Further, a waste management plan is to be developed in consultation with the relevant Councils.

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.

Aquatic ecology impact assessment

Appendix H notes,

Figure 5 (page 15) Aquatic Ecology Survey Locations Within the Study Area,

Council requests e-DNA locations on map (as indicated) to interpret where data was extracted within the stream

Appendix A, pg. 49, there is no image, Council request the image

BADR 3.1.2 states the study area contains 14 water courses, the aquatic ecology assessment only focuses on 3, Council requests other 11 water courses be assessed fully.

Community consultation

Council requests that community consultation is ongoing to ensure that the community has current and accurate information about the project and to provide feedback on the proposed project including traffic, construction, or social impacts. As such, consultation should include the provided impact area including Gulgong and Mudgee where the proponent proposes to source and house workers.

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 State Significant Developments 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.

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

Yours sincerely,

A handwritten signature in black ink, appearing to be 'BRAD CAM', with a stylized flourish extending to the right.

BRAD CAM
GENERAL MANAGER