

Office of the General Manager

LP | LAN900161

21 January 2025

Rita Hatem
Energy Assessment
NSW Department of Planning, Housing, and Infrastructure
Locked Bag 5022
PARRAMATTA NSW 2124

Dear Rita,

SUBJECT: MAYFAIR SOLAR FARM (SSD-60074458) ADVICE - ENVIRONMENTAL IMPACT ASSESSMENT

Thank you for providing Mid-Western Regional Council (Council) with the opportunity to provide input into the Environmental Impact Statement (EIS) for the proposed Mayfair Solar Farm (SSD-60074458). Council has reviewed the documents and wishes to provide the following feedback.

Project Overview: The Mayfair Solar Farm, proposed by Elgin Energy Pty Ltd, is a utility-scale solar farm with a 60MW capacity, including a Battery Energy Storage System (BESS) of 240MWh. The project will be located at 204 Jacksons Lane, Stubbo, NSW.

Workforce and Accommodation

The EIS notes (3.2.7) An on-site temporary workforce accommodation camp is proposed in the south-west part of the site.

Council supports the project including a temporary workforce accommodation camp for 150 workers.

However, Council **strongly objects** to the accommodation camp be built at the same time as construction starting and requests it to be built prior to construction to house construction workers.

Table 1.2 state there will be 62 non-local workers starting construction of the solar farm and 20 accommodation camp workers by month 5 of the 6-month camp build, this is 88 construction workers that need to be accommodated prior to the camp being available for workers.

Council notes in Appendix R – Interim workforce and accommodation plan still need significant more detail, Council request this be completed and approved by Council **prior** to Consent.

Council notes (Appendix 3 - 3.0) table 5 excludes Hotels and Motels as available for short term accommodation in the Mid-Western Region, however, includes Holiday Parks, B&B and Airbnb as possible accommodation for construction workers, Council advises these accommodation types are also used for tourist accommodation in the region.

Council advises it does not support the use of existing tourist and visitor accommodation for the construction workforce. Council also requests the Proponent consider the status and timing of all other state-significant developments within the Mid-Western Region to minimise any adverse cumulative impacts.

Council advises the summary of potential cumulative impacts (Appendix 3 - 4.3) needs to be reviewed and updated, from Councils understanding the Bellambi Heights BESS will start roadworks mid 2025, the CWO REZ Transmission line will start roadworks late January 2025, Wollar BESS will start works 2026 and Birriwa Solar Farm in 2026 as well as other potential SSD's.

Council notes (Appendix 3 - 4.3.4) that there will be project workers parking in local towns, and the provision of regular shuttle bus services to and from Gulgong (and Mudgee) with specified drop-off and pick up points. Council requests more information regarding the shuttle bus service. It must be noted that **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.

Water and Waste Water

The EIS notes (3.2.13.6)

Construction water will be collected onsite from roofed structures and stored in onsite water tanks. Incorporated into a Construction Stormwater Management Plan prepared post approval. Council requests the stormwater management plan is shared with Council prior to construction commencement.

The EIS also notes sewage is proposed to be collected onsite and identified to be disposed of at Dubbo via contractors.

Appendix R – Interim Workforce Accommodation Plan (3.7.1)

Council notes the Proponent acknowledges that MWRC at this point in time does not have water capacity or assets to service the needs of approved and proposed projects and that such projects will need to find alternative sources of water.

The proponent advises potable water to serve the Temporary Workers Accommodation will be sourced from Dubbo via independent contractor.

Council advises that water carting from Mid-Western Regional Council water sources (both potable and non-potable) is currently under review with consideration of the potential cumulative impact that SSD project demands may have on existing Council source water allocations as well as infrastructure capacity. Council provides potable water supply to the urban communities within the local government area and does not commit to a Level of Service suitable for water carting outside of the urban areas. As such, should commercial water carters seek approval to cart water to specific SSD projects, at the time of application (Section 68 LG Act), Council will consider the ability to supply while maintaining security of water supply for the existing urban communities.

The Proponent also identify (3.7.2) that Mudgee Sewage Treatment Plant (STP) has limited capacity to receive septage. Council advises this facility has been designed to receive septage from Council's rural domestic customers, and as such any capacity made available for commercial projects will need to be via consideration of STP upgrades, Council is willing to discuss this further with Proponents if they are considering using the Mudgee Facility. if the Proponent wishes to use the STP, upgrades may be required to and would be at the Proponent's expense.

Council also advises that liquid waste cannot be received at Gulgong STP. The only sewage treatment Plant with a tankered waste Receival facility in the Mid-Western LGA is Mudgee STP. Mudgee STP has limited capacity to receive liquid waste via truck and as such it is suggested that commercial waste carting businesses are consulted to establish frequency of potential servicing during design of onsite sewage management. The proponent may wish to instigate negotiations regarding possible upgrades to Councils STPs.

Waste

Appendix S (3.4) Waste Management Plan notes, nearby waste facilities operated by regional councils such as Mid-Western Regional Council and Warrumbungles Shire Council are **unlikely** to accept waste due to the large amount of waste generated as a state significant.

Council wishes to advise that none of its waste facilities in the Mid-Western Region are appropriate or capable of handling the disposal of landfill waste. All of Council's other waste facilities are waste transfer stations accepting residential waste, which is then transported to Mudgee waste facility. They will not be suitable for waste from any projects.

Council is willing to discuss with Proponents opportunities for recycling products.

Council notes, although informative, some of the details in the waste management plan is of a general nature and Council request a final version of the waste management plan with specific detail on how the waste will be managed be approved by Council prior to constructions.

Community Participation During Construction and Operational

Council appreciates the engagement outcomes report and requests the Proponent provide details on its proposed communications plan and identify mechanisms by which the community can provide feedback during construction and operations. This should also include the Proponent's approach to dealing with complaints or compliance issues.

Traffic, Transport and Accessibility

Council **objects** to the Traffic Impact Assessment (TIA) as it does not adequately address the impact on local roads or the residents who reside on the urban streets proposed to be used (Rouse St / Barneys Reef Rd).

No cumulative traffic generation numbers have been provided that detail which local roads may be impacted by the cumulative impact of large-scale renewables. Section 4.7.3.6 deals with Highway related impacts only. **Council does not agree** with the sentiment it is unlikely other developments will not occur at a similar time.

While Rouse St is a B-Double Route that allows connectivity of Cope Rd to the broader Hwy network this is a residential area. The TIA does not deal with an intensification of heavy vehicle movements in the area. Comparative traffic counts are required for this area to properly assess construction and project related impacts.

Black Lead Lane is not a b-double route and no assessment of existing traffic volumes, community impacts, road conditioning or required upgrades has been undertaken. The proponent should be aware Council has a restricted load limit on that road to prevent heavy vehicle use due to community sentiment. Black Lead Lane is currently not suitable for heavy vehicles and would require significant upgrade works including pavement strengthening, causeway replacement and ongoing maintenance.

Residents along Black Lead Lane have objected in the past to the use of this road for heavy vehicles. It is recommended community consultation is undertaken prior to finalisation of the heavy vehicle route.

The haulage route includes Black Lead Lane, yet no road safety assessment has been done of this road, the assessment has been done on the b-double route of Rouse St. The TIA does not include road upgrades proposed for roads other than Jackson Lane or the standard to which they will be upgraded.

All road upgrades shall be considered in line with Austroad Guideline for road design and be proposed roads and intersections to be upgraded should be included in the TIA.

Decommissioning

The EIS notes in (3.2.14) and in Appendix Q Social and Economic impact assessment (9.9.6) a Decommissioning Management Plan will be prepared and distributed to all relevant authorities at least three months before decommissioning works start.

Council requests a decommissioning and rehabilitation plan be prepared in consultation with Council prior to consent and ideally, should be updated every 5 - 7 years to keep up with any changes.

Council also requests that such a plan includes the following, at a minimum:

- The anticipated present value cost of decommissioning works, along with an explanation of the calculation of that cost (including a buffer for changes in market values/ inflation).
- The physical plan for decommissioning, prepared or certified by an engineer, confirming that full remediation/ restoration of the site to its former primary production use/ class land capability is possible.
- Commitment to a financial security to cover the cost of decommissioning.
- Management and waste reduction initiatives as to where generated waste will be disposed and/or recycled, without impacting on local waste facilities and in accordance with:
 - Protection of the Environment Operations Act 1997
 - Protection of the Environment Operations (Waste) Regulation 2014
 - Waste Avoidance and Resource Recovery Act 2001
 - NSW Environment Protection Authority (EPA) Waste Classification Guidelines

Council notes in the Waste Management Plan that the Proponent advises underground infrastructure may remain if there is significant justification for retaining it such as any cabling or similar infrastructure that is imbedded deep within soil. This infrastructure may be retained as to not place any extra disturbance on soils or native vegetation.

Council advises that if underground structure is being considered to remain the detailed justifications be included in the Decommissioning Management Plan.

Services

The EIS notes (6.4.1.6) It is considered that the additional demand for health care due to the

workforce could impact the current services available. Mitigation measures include the accommodation of one on-site nurse to attend minor injuries and medical issues, as well as worker briefings via lecture and visual aids regarding the issue of limited local medical and health facilities, particularly in the smaller townships.

Council advises there is very limited availability of health services in the region, and it is important to consider a plan for supporting the community and employees' health needs. Council suggests implementation of a medical center and 24-hour nurse practitioner who can prescribe medications in the workers camp and to consider a "shared doctor".

Council also strongly recommends the implementation of telehealth services for workers to access GP's and medical services 24 hours. Telehealth allows employees to consult with healthcare professionals remotely, providing convenient access to medical advice and reducing the need for in-person visits.

Visual Screening

Council recommends a comprehensive native vegetation and landscaping plan be established to ensure that the value of the natural environment, together with flexibility in land use or development, is maximised. A multi-level screening planting strategy would be an integral part of the project to protect the visual amenity within the region. Early-stage planting and diligent care during construction will help ensure the survival and proper growth of these plants. Adequate screening not only enhances the visual appeal of the project but also minimise potential negative impacts on the surrounding landscape and neighbours. Species choice is important and ideally should be native vegetation common to the area. It is imperative that an appropriate management plan accompanies any vegetation planting initiatives.

Cumulative Impacts

In addition to the above, Council wishes to ensure significant consideration of the cumulative impacts of this proposal 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.

Council requests the Proponent to further engage with Mid-Western Regional Council to continue discussion on the Voluntary Planning Agreement.

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 read 'Alina Azar', with a stylized flourish at the end.

ALINA AZAR
ACTING GENERAL MANAGER