



AA | LAN900138

3 September 2025

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

cameron.ashe@dpie.nsw.gov.au

Dear Cameron,

SUBJECT: RESPONSE TO MODIFICATION OF BIRRIWA SOLAR FARM SSD-29508870-MOD-1

Thank you for the opportunity for Council to provide a response to the Modification request for Birriwa solar farm. Please find following comment from Mid-Western Regional Council in regard to this application for modification.

1. Traffic and Transport

Council acknowledges the modification introduces a secondary access route along Merotherie Road and Birriwa Bus Route South to the site entry. Consultation with Council on this option has been ongoing and the alternative access is **generally supported**, subject to:

- Suitable road upgrades being delivered as described in the modification report.
- Acknowledgment that sections of Birriwa Bus Route South contain substandard curves that may require property acquisition to achieve compliance with Austroads Guidelines.

To ensure safe and consistent outcomes:

- Appendix 5 of the project consent must be amended to capture the additional road upgrades to Council's satisfaction.
- The section of Birriwa Bus Route South between Merotherie Road and the site entry should be constructed in accordance with Austroads Guidelines and Appendix 5 upgrade requirements, except where Council agrees to vary the design to preserve biodiversity while maintaining road safety standards.

Council recommends the following condition be included:

"Resurfacing and widening of Birriwa Bus Route South to a minimum width of 9.2m, which includes 7.2m seal and 2m unsealed shoulders (2x3.1m travel lanes + 0.5m sealed shoulders

both sides + 1m unsealed shoulders both sides) except where agreement has been reached with the roads authority to vary this standard.”

Further, heavy vehicle and workforce traffic assumptions in the modified TIA require review to ensure consistency. The assumption that camp-based workers will generate minimal off-site travel is unlikely and risks underestimating traffic impacts during non-shift hours. Council reiterates its request for:

- A revised Traffic Impact Assessment with consistent workforce assumptions.
- Assessment of cumulative impacts with other energy projects and accommodation facilities.
- Maximum hourly vehicle movement caps.
- Dilapidation survey reports provided to the relevant road authorities before and after construction.

2. Workforce Accommodation and Social Impacts

The modification report confirms that:

- The peak construction workforce will increase from 500 to 650 workers.
- The temporary accommodation facility capacity will increase from 500 to 650 beds, provided in 163 four-bed demountable units.
- The accommodation facility will be operational for the full 28-month construction phase.
- Communal infrastructure is designed to support 650 workers but is readily expandable to 1,000 workers for future projects (subject to approvals).

Council acknowledges the inclusion of an accommodation camp is a positive step in reducing pressure on Mudgee and Gulgong housing markets. However:

- Sewage disposal arrangements remain undefined.
- Water supply options are listed but feasibility and security of supply are not demonstrated.
- The scale of the accommodation (650, with infrastructure expandable to 1,000) increases the importance of resolving these issues prior to determination.

Council cannot support reliance on Council's water and sewer facilities without major funded upgrades by the proponent.

3. Biodiversity and Environmental Matters

The Biodiversity Development Assessment Report (pg. 35) notes the likely emergence of *Acacia ausfeldii*, a threatened species, following soil disturbance along Birriwa Bus Route South. Council advises that any future road maintenance or upgrades in this area will require additional environmental assessments and species impact statements.

In addition, koala scats have been identified within close proximity of works and are known to occur within high-value vegetation communities (PCT 281, 277). Council maintains its position that vegetation removal should be kept to the minimum extent possible and further site-specific koala studies undertaken prior to clearing.

4. Waste Management

Construction and domestic waste volumes associated with up to 650 workers and large-scale construction remain a concern. Council facilities do not have the capacity to accommodate project waste. A Waste Management Plan identifying disposal/recycling routes and facilities must be provided, ensuring no reliance on Council facilities without significant upgrades funded by the proponent.

5. Construction Hours

The modification seeks to extend Saturday working hours and allow inaudible activities outside standard hours. Council does not support this change, as extended hours will negatively impact the amenity of nearby residents through increased dust, noise, and traffic. Standard construction hours should apply.

6. Decommissioning and Rehabilitation

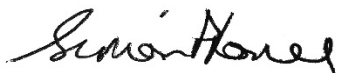
Council reiterates its position that a robust Decommissioning and Rehabilitation Plan must be prepared and conditioned to include:

- A costed estimate of decommissioning works, with allowance for inflation.
- An engineer-certified physical plan demonstrating land can be returned to agricultural use.
- Financial security to cover decommissioning costs.
- Periodic updates (every 5–7 years).

Council recognises the proponent's efforts to refine the project through this modification, particularly the inclusion of an accommodation camp and additional access arrangements. However, several critical matters remain unresolved, including traffic assumptions, water and sewer feasibility, waste management, biodiversity impacts, and extended construction hours. Council respectfully requests the Department incorporate the recommendations and conditions outlined above into any consent determination for the modification.

If you have any questions in relation to this submission, please do not hesitate to contact Council on 02 63782850 or council@midwestern.nsw.gov.au.

Kind regards,



SIMON JONES
ACTING GENERAL MANAGER