

Coonabarabran:

14-22 John Street  
Coonabarabran NSW 2357

PO Box 191  
Coonabarabran NSW 2357

ABN: 63 348 671 239



Calls from within Shire  
1300 795 099

Calls from outside Shire area  
Coonabarabran:  
02 6849 2000

Coolah: 02 6378 5000

Fax: 02 6842 1337

Email:  
[info@warrumbungle.nsw.gov.au](mailto:info@warrumbungle.nsw.gov.au)

Coonabarabran - Coolah - Dunedoo - Baradine - Binnaway - Mendooran

Please address all mail to:  
The General Manager

Please refer enquiries to: **Leeanne Ryan**  
Doc ID: 223557

29 September 2025

Cameron Ashe  
Senior Environmental Assessment Officer  
Development Assessments and Sustainability  
Department of Planning, Housing and Infrastructure  
Locked Bag 5022  
PARRAMATTA NSW 2124

[cameron.ashe@dpie.nsw.gov.au](mailto:cameron.ashe@dpie.nsw.gov.au)

Dear Mr Ashe

### **Proposed Cobbora Solar Farm and Battery Energy Storage System (SSD-29491142)**

Thank you for the opportunity for Warrumbungle Shire Council ('Council') to comment on the Environmental Impact Statement (EIS) for the proposed Cobbora Solar Farm ('Project'). The Project is located 20kms south-west of Dunedoo, with approximately 90% of the intended infrastructure within Warrumbungle LGA and 10% in Dubbo LGA.

In terms of potential impacts on Warrumbungle LGA community and assets, Council understands the proposal seeks to, inter alia:

- Construct and operate a \$1.4 Bil, 700 MW AC solar farm and 400 MW/1,600 MWh battery energy storage system (BESS), occupying 1,600 ha;
- Construct and operate four substations;
- Have up to 734 Full-Time-Equivalent (FTE) construction workers during the peak construction period;
- Build and operate a worker accommodation camp for all non-locally based workforce participants, capacity not specified, potentially up to 734 beds;
- Have four site access points along Spring Ridge Road and one on the Golden Highway;
- Have a construction period of four years; and
- Have an operational lifespan of 35 years for the solar farm and 25 years for the BESS.

In light of the above, Council makes the following submission.

#### **1. Absence of Strategic, REZ-Wide Cumulative Impact Assessment Studies**

There are a dozen REZ-related proposed/approved projects located wholly or in part in Warrumbungle LGA. Across the REZ overall (inside or just outside) there are more than 35 proposed/actual renewable energy projects.

Whilst Council is generally supportive of renewable energy initiatives, it is unable to make an informed, merit-based decision on the benefits and costs of the Project at this time because the strategic, REZ-wide cumulative impact assessment (CIA) studies being conducted by the NSW Government have either not yet been completed or finalised.

Crucially, the remedial/mitigative actions to address the cumulative socio-economic costs have not been identified and implemented (for example health care, policing and emergency services). This CIA could well determine that the Conditions of Consent (CoC) for each REZ project should also include additional and varied CoCs, given the REZ-wide cumulative impacts.

It is because of these unresolved and significant matters that Council hereby lodges an **objection** to the Project. The prospect of Council subsequently reviewing its objection is dependent on whether the NSW Government and the Proponent actively and substantively engages with Council to address, to Council's satisfaction, the concerns listed herein.

Lodging an objection is not a decision Council takes lightly, however experience suggests that this is the most realistic option available which provides Council with hope that its voice, and that of its communities, will be heard and acted upon by both the NSW Government and the Developer.

Council seeks transparency regarding:

- a) What are the environmental, social and economic costs and who bears them?
- b) What are the environmental, social and economic benefits and who reaps them?

Council also considers it essential that the Proponent:

1. Demonstrates how the Cobbora Solar Farm will address potential cumulative impacts on workforce accommodation, traffic, water resources, waste disposal, and social services.
2. Coordinates with EnergyCo and NSW Government agencies as the CIA progresses, ensuring project management measures are adapted according to emerging cumulative impact findings.
3. Implements interim mitigation strategies to reduce adverse impacts on the local community while awaiting strategic outcomes.

Council emphasises that while EnergyCo's strategic CIA and coordination with government agencies may provide long-term solutions, there remains a risk that cumulative impacts from the Cobbora Solar Farm could occur before the study's outcomes are available. Firm commitments from the Proponent to manage and mitigate these impacts are required prior to SSD determination to protect local communities and infrastructure.

## **2. Road and Traffic Impacts**

### **2.1 Particular Roads**

Council's key traffic concerns are as follows:

- Council is the statutory roads authority responsible for funding and maintenance of some 15-30km of local roads within or bounding the Project footprint, including Spring Ridge Road, Danabar Road, Sandy Creek Road and Dapper Road. These are best described as narrow rural laneways that are built neither to safely cater for any increase in traffic volumes using them, nor to accommodate significant heavy vehicle loadings, without rapid deterioration and failure of the pavements.
- The EIS and Traffic Impact Assessment (TIA) is considered opaque, incomplete or inconsistent with respect to the projected vehicle numbers, with impacts on local roads generally significantly understated (perhaps by a factor of double or more).

- As a result, Council's assessment is that significant upgrades are required for the full length of Spring Ridge Road, the site access points, and public road crossings.
- Council offers its summary below, in anticipation the Developer may continue discussions with Council as to what upgrades can be accepted along impacted routes, clarify and provide a more detailed reconciliation of traffic before the DPHI's assessment progresses.
- Based on the site's direct frontage to the Golden Highway, Council suggests there is a viable opportunity for the Project to commit to only a single access point via that State Road, with all traffic to traverse the site using internal private roads. If managed well, ensuring Project traffic complies with route restrictions, this could avoid the need for major upgrades of Council's local roads, limiting the focus (and cost) of upgrades to key road crossing points.
- Otherwise, based on the current proposal for four access points and heavy vehicle movements on Spring Ridge Road, the Project will be required to complete a full-depth and full-width rebuild of Spring Ridge Road to meet Austroads standards between the highway and the site access gate.
- The crux of the Developer's assessment for Warrumbungle Shire roads is (section 5.3.1.2): "*The increase in construction traffic is of a temporary nature and would have a temporary and short-term impact. These impacts would be managed by road condition inspections and maintenance procedures in accordance with the Construction Traffic Management Plan.*" That is, the Developer proposes no upgrades. For a four-year construction phase with major intensification of traffic, this assessment does not meet the 'reasonable and practicable' threshold for mitigations under NSW planning law, let alone when considered cumulatively with the severe impacts of other projects using the same route at the same time.
- It is unclear how the Project can feasibly upgrade to offset and mitigate the impacts of its traffic increase, while the same route is also proposed to be used by the EnergyCo Transmission Line and Sandy Creek Solar Farm, all likely in an overlapping time window occurring over the next 4-8 years. Each project on its own is likely to deplete the pavement life of the existing roads many times over, as well as cause a manifold increase in the safety risk and actual number of traffic incidents affecting all road users (public and Project traffic).

A more equitable solution for all developers could be a formal arrangement to share funding, construction and maintenance responsibilities in proportion to each Developer's traffic impacts.

However, Council has limited statutory powers to bring about such agreement(s), and in the absence thereof, the default requirement for each developer under established NSW planning principles would be consent conditions for each developer to jointly and severally upgrade the roads to cater for their own traffic increase.

Council notes that the Developer may request DPHI consider imposing conditions tied to Council's Adopted Section 7.11 Contribution Plan for road maintenance cash contributions in connection with Project heavy vehicle movements.

## **2.2 Traffic Compliance Management**

Clear commitments and accountability methods to not use certain local roads are also sought, by active management and surveillance of Project traffic. In particular, Project traffic

should be prohibited from using Spring Ridge Road, Sandy Creek Road, Dapper Road or Bald Hill Road between the southernmost site access and either the Castlereagh Highway and Gollan Road, or any other local roads, other than the permitted route directly via Spring Ridge Road between the Project site and the Golden Highway.

### **2.3 Predicted Traffic Volumes**

Key findings from the EIS and TIA relating to Council's roads include forecast traffic increases of 88 heavy vehicles, 2 OSOM vehicle movements and 14 light vehicle movements per day.

Council notes that by the size of the project and comparisons with similar projects, these numbers are anticipated to be at the lower end of likely traffic scenarios, representing 'inbound' movements only (counted in one direction). It is expected the volumes would be at least doubled when counting all movements across the network, for example, 166 one-way heavy vehicle movements per day counting the empty return movement.

While a limited selection of Project materials and wastes are tabled (EIS Table 6-81), the Project has not provided a comprehensive estimate of the total haulage materials volume. Based on high-level calculations and experience with similar projects it is likely to include a million or more tonnes of concrete, gravels and sands for foundations, pavements and trenches, and hundreds of thousands of tonnes of cable and metalwork for structures, enclosures and solar arrays. This further increases significantly if public road upgrades are required, which so far appear to be assumed by the EIS and TIA to be practically nil.

Based on Council's REZ experience is likely that a reasonable assessment of total Project heavy vehicle movements could exceed a few million tonnes of materials, equating to in the order of 100,000 heavy vehicle loads (plus 100,000 empty return movements) assuming average B-double loads (33 Tonne payload).

Over a 4-year campaign this could be expected to average around 1,000 truck movements per week, 180 per day, or 18 per hour (using a 50-week year, 5.5-day week, and 10 hour day shift). Occasional peaks could be significantly higher, e.g. during concrete pours.

Regarding the Drive-In Drive-Out (DIDO) commuter workforce strategy, and temporary workforce accommodation onsite, the EIS and TIA note an additional 34 shuttle bus movements per fortnight during the peak (17 at roster start and 17 at roster end). However, the TIA (section 4.5.2) assumes a shuttle capacity of 40 seats which would equate to at least 21 shuttle loads per shift, even if 100% of the 734 workers were from out of area and accommodated onsite and assuming average 90% seat occupancy. 21 occupied shuttles would give 42 shuttles per fortnight (roster start and end), or 84 shuttle movements when the empty return movements are included, more than double the claimed number.

Commuter movements would be yet higher if a proportion of the workforce are locally based in towns and using their own light vehicles – say an additional 294 light vehicle movements per day (in and out combined), if 20% (147 persons) are local workers coming from nearby towns and 80% are accommodated onsite. Separately, 5-20% of the onsite workforce may be expected to undertake local trips in light vehicles between the Project and towns, for lunch or daytime or evening appointments or shopping, which could equate to a further 74 to 294 light vehicle movements per day (in and out combined). While scheduled evening shuttles provided by the Project could reduce these volumes somewhat, no firm commitments have been made.

The total commuter demand at key locations such as Spring Ridge Road, adding together local workers' trips to site, and onsite workers' trips to towns, could therefore exceed 500 light vehicle movements per day if not proactively managed by the Project. This stands in

sharp contrast with the claimed '7 light vehicles per day... required to access the Project area' (TIA section 5.3.1.1). This analysis highlights that due to the large workforce size, the actual light vehicle traffic is very sensitive to inherently uncertain parameters, and Council's roads are likely to suffer severe gravel loss and reduced safety outcomes as a result of the Project. The Project is required to commit to meaningful measures to reduce traffic volumes and upgrading of impacted roads to improve safety and pavement maintenance outcomes in line with current Austroads standards.

Council expects the Proponent to provide a detailed and enforceable shuttle bus plan, including routes, schedules, contingency measures, and compliance monitoring. Measures should ensure the shuttle service does not create excessive wear or safety risks on public roads, and that Council is compensated for any additional maintenance.

During the operational phase, 30-40 permanent parking spaces are depicted onsite, which suggests significantly greater than the stated 20 full time workers will regularly attend site each day. The Project lifetime (construction, operational and decommissioning) light and heavy vehicle movement numbers, for the purpose of traffic safety upgrades and pavement life, should be assessed with inclusion of higher demand for more than 35 years during the operational phase.

Council considers the assessment relating to cumulative traffic impacts (section 5.3.6) is inadequate. The TIA lists several other approved or proposed developments in proximity to the Project but does not quantify the likely cumulative impacts of all developments' traffic on the local road network, and specifically Spring Ridge Road. Furthermore, it appears that each other development is assessed in relation to the proposed Project in isolation and the potential combined impacts of multiple projects are not addressed. Council notes that despite optimistic assessments in those EISs, each of the EnergyCo and Sandy Creek Solar projects (on their own) are expected to have similar daily volumes to this Project – with more than 100 heavy vehicle movements per day for each project.

#### **2.4 Ownership and Accountability for Funding Road Upgrades**

TIA (section 5.3.1.4) notes that "*The condition of the road pavement may not be suitable for construction traffic; however, it is expected to be suitable after upgrades associated with the Elong Elong Energy Hub project are completed.*" To date and despite ongoing representations from Council on this issue, EnergyCo has not agreed to any pavement upgrades along the full length of Spring Ridge Road (other than at the local Golden Highway and Dapper Road intersections).

If Cobbora Solar Farm cannot negotiate a shared solution with EnergyCo, Cobbora Solar Farm may be left to rehabilitate a heavily damaged road at its cost. As per advice in the Austroads Guide to Pavement Technology, often the damage from depleted pavement life by previous developers can be invisible beneath the surface, only revealing failures on a widespread scale after wet weather or flooding, or when the next developer commences its main haulage campaign.

Pre- and post-construction dilapidation assessments of pavement condition will not on their own be adequate to ensure that the damage done to Council's roads by project traffic will be fully repaired or offset. Most damage done by each passage of a truck may not be visible upon completion of the construction campaign. Staged full-depth upgrades of Spring Ridge Road may be necessary to ensure it is fit-for-purpose to accommodate the cumulative traffic of all projects and ensure that the road is in no worse condition than it was prior to commencement of the projects.

#### **2.5 Crown Roads**

The EIS notes (section 2.6.2) that in the southern portion of the Project Area a landholder has commenced the application process to permanently close and purchase unformed Crown road reserves. While details will be referred by Crown Lands to Council in due course under separate Roads Act procedures, Council notes for the purpose of the current planning application it cannot be assumed closure will be complete in line with the Developer's request. The Project must be assessed on its merit based on current conditions and assuming the roads remain public dedicated road reserves. Council may or may not support such a proposal to close unformed Crown roads depending on the reserves' strategic value for access to adjoining parcels or other local points of interest.

### **3. Water Management – potable and non-potable**

The EIS estimates that 410 ML of non-potable water will be required over the 36-month construction period and of that total number some 180ML will be hauled to site by trucks and 173ML will be sourced from local groundwater bores. Will bore water be delivered by pipeline?

Council seeks information as to:

- a) Where this large quantity of offsite non-potable water is to be sourced, especially in the context of multiple GW-scale REZ projects being undertaken at the same time?
- b) Which Warrumbungle Shire public roads will be used for haulage between the source and the Project?

Additionally, approx. 57 ML of potable water is required during construction phase. Where will this be sourced? This is a significant quantity in the context of local town water supplies which do not have spare capacity.

Also to note, several other GW-scale projects in the REZ have forecast several hundred ML of water would be required each year during construction, potentially double that published as required by this Project, and Council considers the higher estimates credible considering volume of water calculations for temporary workforce accommodation, concrete foundations for all structures and solar panel arrays, sand and gravel conditioning for compaction of pavements and trenches, and other construction needs such as dust suppression during dry periods.

Some 180 ML non-potable plus 57 ML potable to go by Council roads represents around 16,000 loaded watercart movements (plus 16,000 empty return movements), assuming average 15 kL watercarts. Over the proposed 4-year construction phase, it appears that the Project could require an average of 160 movements per week, or some 30 movements per day just to meet the applicant's forecast water demand. As above, Council suggests this quantity should be doubled for the assessment scenario, an average of 60 watercart movements per day. This does not appear to have been factored into the TIA volume forecasts.

The proposed extraction from groundwater bores is estimated to account for approximately 0.25% of the allocated share for commercial extraction in the local groundwater source. While this is a small proportion of the overall allocation, local farmers and community members have expressed concerns regarding the potential cumulative impacts of multiple renewable energy projects within the CWO REZ, particularly during drought or low rainfall periods. Concerns include the sustainability of aquifers, impacts on agricultural water access, and potential environmental effects.

Council notes that the allocation and regulation of groundwater harvesting rights is the responsibility of the NSW Government through the Department of Planning and Environment and the Natural Resources Regulator. Council is not the decision-maker regarding these entitlements. However, Council is voicing the concerns of its community to ensure that the

potential impacts of the project on water resources, agriculture, and the local economy are fully considered by the regulator.

Council expects the Proponent must provide a comprehensive Water Management Plan outlining the sources, volumes, extraction points, and contingency measures for water supply, including cumulative impact assessment considering other REZ projects. A thorough assessment of the local aquifer system to evaluate sustainability of groundwater extraction and potential effects on surrounding landholders and ecosystems should also be provided.

Council also expects that ongoing engagement with local farmers and stakeholders to address concerns and incorporate feedback into the water management strategy will be undertaken by the Proponent, along with robust monitoring programs to track groundwater levels and quality, with clear reporting and mitigation protocols. The incorporation of water management and mitigation measures should be included in the SSD consent, where feasible, alongside Regulator approvals.

#### **4. Construction Impacts**

The proposed 3,000 ha Project Area footprint and the 1,600 ha Development footprint present substantial physical, environment and visual impacts. Council seeks detailed information on earthworks, roadworks, drainage, and erosion protection associated with access roads, temporary and permanent site infrastructure (laydown areas, parking, offices, accommodation camp). It is noted the Proponent plans to construct permanent access tracks across both Sandy Creek and Laheys Creek, what approvals and mitigation measures will be put in place to protect the riverine/riparian environment?

#### **5. Waste Management**

It is understood the waste types and quantities generated during construction will include:

- general construction waste (approximately 5,000 tonnes),
- fuels, lubricants and chemicals (approximately 14,000 litres) and
- sewage (approximately 95,000m<sup>3</sup>).

Where will these wastes be disposed? Similarly, the putrescible waste from the accommodation camp? Please note that Council does not have any waste management facilities available to service the Proposal.

Also, what are the waste volumes and types and their destination associated with replacement of PV modules after 15 - 20 years, the replacement of the battery components after 20 years and the decommissioning/renewal of the Project after 35 years of operation?

Reference is made to a large solar panel recycling business in Parkes, NSW, the proponent leaves unresolved the question of where solar array components will be sent at the end of their functional life due to the evolving nature of the industry and likelihood of future technologies. It is further indicated in the EIS that any residual solar panels will be taken to landfill, without providing detail as to how many and to which landfill site. It is therefore unclear whether this poses the risk of local waste facilities becoming the option of last resort for disposal of large bulky waste which is likely to exceed capacity of existing waste disposal facilities.

If non-putrescible waste disposal or storage site(s) are proposed under the project, quantitative road traffic impacts also need to be assessed.

Sewage waste generated during both the construction and operation phases will be collected in septic tanks and disposed of by a licensed contractor at an appropriately licensed facility. However, no assessment has been undertaken to determine whether existing sewage treatment plants in the region, based on their design capacity, could

accommodate the additional volumes (e.g., 95,000m<sup>3</sup> during construction). In addition, the potential impacts, such as increased strain on waste management facilities, have not been addressed in the EIS.

## **6. Employment of Locals and Construction Workforce Accommodation**

The Proponent is likely to engage an Engineering, Procurement, and Construction (EPC) contractor to deliver the Cobbora Solar Farm. Based on experience, such contractors generally have limited appetite to employ and train local workers. This is a significant concern for Council. Accordingly, Council requires the Proponent to employ local workers, with that commitment formally incorporated into the contractor's obligations.

The Social Impact Assessment (Appendix J of the EIS) provides scenarios for the proportion of the workforce that could be sourced locally, but does not commit to a definitive quantum. Council supports prioritising local employment and upskilling before sourcing workers from outside the region, with clear enforceable targets.

The EIS outlines only a general Workforce Accommodation Strategy. Council requires further detailed information and consultation on:

- Location, size, and management of the accommodation facility;
- Number of beds and contingency for workforce surges;
- Security, fencing, and liquor license arrangements;
- Medical, food, and basic amenities;
- Shuttle transport schedules and vehicle numbers;
- Decommissioning or repurposing of facilities post-construction.

Without high-level, enforceable commitments prior to SSD determination, there is a real risk that the project will fail to equitably contribute to resolving accommodation pressures, creating long-term economic and social impacts for the region and the cumulative project demand will result in long-lasting and adverse economic shockwaves for the local economy.

The provision of new accommodation facilities is also expected to be closely tied to outcomes such as road safety and community perceptions of traffic increases. Prior to SSD determination, high-level commitments should be made considering:

- location of such facilities to balance the need to minimise travel distances for road safety and economic development reasons, between accommodation and both the project and residential amenities (largely in towns), as the incidence rate of road injuries or fatalities can closely correspond to the distance travelled.
- what road infrastructure upgrades and management measures may be required to safely accommodate traffic to and from the proposed facility?

Council requires that accommodation facilities are strategically located to balance travel safety, proximity to the construction site, and minimal disruption to local towns; that workforce accommodation and transport plans are formalised and enforceable as part of SSD consent, with compliance monitoring and associated penalties where necessary; and that local employment and training targets are quantified and legally binding, ensuring the project contributes tangible economic benefits to the community.

## **7. Bushfire Management**

Council acknowledges the Proponent's commitment to bushfire safety as outlined in Appendix N of the EIS. However, to ensure comprehensive risk mitigation and community safety, Council requests the following additional information and clarifications:

- Coordination with Emergency Services - While Appendix N mentions consultation with the NSW Rural Fire Service (RFS), Council requests evidence of ongoing engagement with local emergency services, including the Warrumbungle Emergency Management Committee, to ensure integrated emergency response planning.
- Workforce Safety and Training - Appendix N outlines general safety measures; however, Council seeks detailed information on specific bushfire awareness and evacuation training programs for construction and operational personnel.
- Vegetation Management and Fuel Reduction - While Appendix N references vegetation management, Council requests a detailed plan specifying fuel reduction strategy, maintenance schedules, and compliance with RFS guidelines to minimize bushfire risks.
- Regulatory Oversight and Compliance - Appendix N provides high-level commitments; Council requests inclusion of enforceable conditions in the State Significant Development (SSD) consent, with clear monitoring, reporting, and mitigation measures to ensure compliance with bushfire management standards.

Council emphasizes that while the Proponent has addressed several aspects of bushfire management in Appendix N, the additional information and clarifications requested above are essential to ensure that bushfire risks are comprehensively managed and that the safety of the community and the environment is upheld.

## **8. Social Impact**

There will be a 7.8% increase in Warrumbungle Shire population during peak construction; resulting in potential impacts on health services, tourism and community cohesion.

Council acknowledges the Proponent's commitment to community engagement as outlined in the SIA (Appendix J). However, Council emphasizes the need for:

- Continuous engagement with local communities, including Dunedoo, throughout the project's lifecycle to address concerns and incorporate feedback.
- Regular updates on Project developments, potential disruptions, and mitigation measures to maintain community trust and cooperation.

Council concurs with the concerns raised in Section 3.2 of Appendix 21 regarding the demand for workforce accommodation facilities due to the project. To mitigate potential impacts on local tourism operators and services, Council requests:

- Specific information on the type, location, and capacity of proposed worker accommodation facilities, including measures to minimize strain on local resources.
- Evaluation of the combined effects of the Cobbora Solar Farm workforce on local infrastructure and services, particularly in Dunedoo, where the workforce will concentrate.

With the Cobbora Solar Farm construction workforce expected increase in the population of Warrumbungle Shire, with the largest concentration in Dunedoo. Council expresses concerns about:

- Pressure on healthcare, education, policing, and emergency services in Dunedoo and surrounding areas.
- Increased demand for temporary and permanent housing, potentially affecting affordability and availability for local residents.
- Challenges integrating a transient workforce with the established community, which may affect social dynamics, local identity, and wellbeing.

Council requests a comprehensive analysis of the impact on local services and infrastructure, with recommendations for enhancements or expansions to accommodate the temporary population increase being undertaken, along with programs developed to foster positive interactions between the workforce and local residents, promoting mutual respect and understanding.

While the project provides employment opportunities, Council emphasizes the importance of:

- Commitments to employing a significant percentage of the workforce locally, with provisions for training and upskilling to ensure long-term benefits.
- Encouraging the use of local suppliers and contractors to maximise economic benefits within the community.
- Regular assessments of employment outcomes and local economic impacts, with adjustments to strategies as necessary.

Council acknowledges potential health and wellbeing impacts associated with the workforce influx, including:

- Mental Health: Stress and anxiety related to rapid population growth and changes in community dynamics.
- Physical Health: Increased demand on healthcare services, potentially leading to longer wait times and reduced access to care.

Council therefore requests a health impact assessment be undertaken by the Proponent to evaluate potential health impacts, with strategies to mitigate negative effects and promote community wellbeing; and provision of resources and programs to support mental and physical health, including counselling services and health education initiatives.

To address these concerns, Council expects:

- Comprehensive plan outlining strategies to mitigate identified social impacts, with clear responsibilities and timelines.
- Ongoing assessment of social impacts throughout the project's lifecycle, with transparent reporting to Council and the community.

Council emphasizes that mitigation of social impacts is critical to maintaining the wellbeing and cohesion of Dunedoo and the wider Warrumbungle Shire, given the significant temporary population increase from the Cobbora Solar Farm alone.

## **9. Telecommunications**

Council notes that the EIS for the Cobbora Solar Farm provides limited detail regarding telecommunications infrastructure or upgrades. While the EIS focuses on environmental, social, and traffic impacts, telecommunications are a critical component both for the safe operation of the project and for the local community.

Council highlights the following concerns and expectations:

- Project Operational Requirements - the construction and operation of the Cobbora Solar Farm will require reliable communication networks for operational monitoring, coordination among contractors, and emergency response. Any inadequacies in telecommunications coverage could compromise site safety, monitoring of solar assets, and rapid response to incidents.
- Community Impacts – the construction workforce and associated activity may place additional demand on existing telecommunications infrastructure in the nearby Warrumbungle Shire communities. Temporary disruptions or capacity limitations could affect local residents, businesses, and emergency services.

Council requires the Proponent to:

1. Engage with Telecommunications Providers – Assess the capacity of existing networks and identify any necessary upgrades to support both project operations and increased temporary population demands.
2. Prepare a Telecommunications Management Plan – Outline measures to ensure reliable communications during construction and operation, including contingency plans for emergency situations.
3. Mitigate Community Impacts – Ensure that any upgrades or construction works do not adversely impact existing telecommunications services for local residents and businesses.

Council supports initiatives that strengthen local and regional telecommunications capacity as part of the project, provided they are implemented in consultation with the community and relevant service providers.

#### **10. Securing Development Contributions via a Planning Agreement**

As the sphere of government directly responsible for, and engaged in, the day-to-day governance of Warrumbungle LGA, the issues confronting Council are significant and diverse. Whether it be roads and bridges, water and sewerage systems, waste, community/recreation facilities, the availability and quality of this infrastructure and social services impacts on the standard of living, social wellbeing and economic prosperity of our citizens and ratepayers.

Council thus seeks development contributions from the Proponent via a Planning Agreement that acknowledges the broad, tangible and intangible environmental, social and economic costs arising from the Development. Such funds will be applied to a public purpose that will ensure the provision of public benefits.

Council requires a Planning Agreement to be negotiated before any project approval is granted by DPHI, with the Agreement's key terms to be included as a specific condition within the project determination.

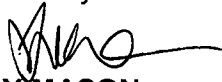
#### **11. Approval Process: Access Rights and Development Consent**

Council notes the EIS for the proposed Project has only just been placed on exhibition this month. Thus, under the EP&A Act, the community has only just been given the opportunity to make formal, written comments of the Project. At this point it is unknown what evidence will be tabled by the general public or various public authorities, or whether the Project will be approved or refused, or perhaps even amended.

Council would appreciate an explanation as to how it can be that the NSW Government granted Access Rights to the Developer to connect to the new transmission line, when the EIS for the Project had not even been tabled for examination by the public and potentially there were likely to be months to pass before a consenting decision was made. Council considers this pre-emptive decision is at odds with respecting the rights under the EP&A Act for the community to have a material say in regards to the proposed project. By pre-emptively granting Access Rights, it appears that the community's rights have been excised.

If you wish to discuss any of the abovementioned matters, please contact Leeanne Ryan, Director Development Services on 02 6849 2000.

Yours sincerely



**LINDSAY MASON**  
**GENERAL MANAGER**