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MID-WESTERN REGIONAL COUNCIL
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Office of the General Manager

29 September 2025

Cameron Ashe
Department of Planning and Environment
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By email: cameron.ashe@dpie.nsw.gov.au

Dear Cameron

SUBJECT: SSD-29491142 COBBORA SOLAR FARM ENVIRONMENTAL IMPACT STATEMENT (EIS)

Thank you for the opportunity for Council to provide a response to the EIS for Cobbora Solar Farm. Please find following comment from Mid-Western Regional Council in regard to the application for this project.

Although the Cobbora Solar Farm is outside the Mid-Western Regional Council local government area (LGA) and sits within Warrumbungle Shire and Dubbo Regional Council areas, it is a very large project that will draw resources and have regional impacts. Previous renewable energy proposals have placed pressure on Council's services by seeking to transport construction waste through the LGA, draw water from our limited supplies or house workforces in towns already experiencing housing shortages. This submission therefore emphasises measures to minimise offsite impacts on the Mid-Western region and to ensure the proponent is self-sufficient for waste management, water supply and workforce accommodation.

Construction Water

Council notes water for construction would be sourced from commercial suppliers (via water trucks), and farm bores located within the Project Area, with non-potable water of around 180ML required. At this point in time, the Proponent should not depend on Mid-Western Regional Council water sources, directly or through third parties, for construction activities, as the capacity to supply this does not exist. Council is willing to discuss this further with the proponent to investigate alternative opportunities for construction water sources if required.

Potable Water

It is noted that about 57ML of potable water will be brought in by commercial water tankers from a licensed supplier, then stored in onsite tanks for use during the construction phase. The intent is to secure this supply through commercial arrangements, keeping the project self-sufficient and avoiding reliance on local town water supplies. Mid-Western Regional Council advises it does not currently have the capacity to support a potable water requirement. Potable water will be required to be accessed from alternate sources and cannot be provided from

local water carters accessing Council's licensed potable supply. The Proponent may require purchasing a water license to access additional water for this project.

Sewerage

It is noted that all sewage from the camp and construction site will either be treated onsite via modular systems or trucked offsite by licensed waste contractors to approved treatment facilities.

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.

As such any capacity made available to this commercial project will need to be via consideration of STP upgrades. Council is willing to discuss this further with the Proponent to investigate opportunities for sewage disposal. If STP upgrades are not carried out, Council requires the Proponent to have suitable sewage treatment and treated effluent application facilities onsite without the need for sewage transfer to Council facilities.

Waste

It is noted that all construction and camp waste (general, hazardous, and sewage) will be collected onsite and removed by licensed waste contractors to approved facilities. Recycling and reuse will be prioritised, however the EIS leaves the actual disposal facilities to be nominated later.

In this regard, Council wishes to advise that none of its waste facilities are appropriate or capable of handling the disposal of landfill waste generated by the project. The Mudgee Waste Facility has limited capacity to accommodate enormous quantities of landfill material likely to be generated by the project. All of Council's other waste facilities are waste transfer stations accepting residential waste only, which is then transported to Mudgee waste facility. They are not suitable to accept waste from this project. Please note any contract with a third-party waste company does not mean that materials collected can automatically be taken to a Mid- Western Region facility.

Council may be able to accept cardboard and paper waste from recycling sources by agreement and will work the proponent on to negotiate quantities that may be accepted and delivery expectations.

Workforce Accommodation

It is noted that the plan to manage workforce accommodation is to establish a 9-hectare on-site accommodation camp within the main construction area adjacent to Spring Ridge Road. This camp is designed to house the entire peak construction workforce of up to 734 full-time equivalent (FTE) workers. The EIS acknowledges that workers to construct the camp will be shuttled from nearby airports to the site; 20–40 workers will build the camp itself, likely bused in daily from Dubbo, Dunedoo, Gulgong, or Mudgee.

Previous renewable energy projects have placed significant pressure on the housing market in the Mid-Western region. There is a shortage of rental accommodation in towns such as Mudgee and Gulgong, and local businesses already struggle to attract staff because workers cannot find housing. Council therefore opposes any reliance on Mid-Western towns to house the Cobbora workforce.

Medical Services

It is noted that the workforce accommodation camp will include a first aid facility staffed by an onsite nurse during construction. The facility will provide basic medical treatment and first aid, reducing reliance on local GP clinics and hospitals for routine issues.

The Mid-Western Region and surrounding LGAs are already suffering severe GP and other medical service shortages. Whilst Council acknowledges the proponent's commitment to provide a first aid facility and onsite nurse during construction. However, Council remains concerned that the scale of the proposed workforce — up to 734 workers at peak — will place unacceptable pressure on existing local medical services, particularly general practitioners in Dunedoo, Gulgong, Mudgee and Dubbo, if only basic first aid is available onsite.

Council strongly recommends that:

1. A prescribing nurse practitioner (with authority to prescribe medications and issue medical certificates) be present onsite 100% of the time during construction, rather than a general nurse role limited to first aid.
2. A dedicated telehealth service be established for the workforce to provide virtual consultations with doctors and specialists 24/7, thereby reducing demand on local GP practices and emergency departments.

Traffic and Transport

The project's construction traffic will primarily use the Golden Highway and Spring Ridge Road, directly into the site from these points. The EIS does not propose routing traffic through Mid-Western LGA towns like Gulgong or Mudgee. The assessment of any impacts on Local and Regional Road assumes it will be minimal.

As water, sewage, waste management and other supporting services are yet to be determined, this current assessment may severely understate potential impacts on the Mid-Western region road network. Council requests that as management plans are developed, if there is any additional traffic on Mid-Western region road network that Council is engaged in this process.

Should you have any questions regarding this matter, please contact Council on 02 6378 2850.

Yours sincerely



BRAD CAM
GENERAL MANAGER