



Suntop Solar Farm

Accommodation and Employment Strategy

Doc ID: CSI-SU-BY-DOC-DC-0034

Rev No.: 2

Rev Date: 16/04/2020



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ACRONYMS AND ABBREVIATIONS

AS	Australian Standard
AES	Accommodation and Employment Strategy
BESS	Battery Energy Storage System
BYCA	Bouygues Construction Australia Pty Ltd.
CoC	Conditions of Consent
CCR	Construction Compliance Report
CEMP	Construction Environmental Management Plan
CL&W	Crown Lands and Water within Department of Industry
Construction	The construction of the development, including but not limited to the carrying out of any earthworks on site and the construction of solar panels and any ancillary infrastructure (but excludes any upgrades to the public road network required under this consent, installation of fencing, artefact survey and/or salvage, overhead line safety marking and geotechnical drilling and/or surveying)
Council	Dubbo Regional Council
DoEE	Department of the Environment and Energy (Cwth)
DPIE	(NSW) Department of Planning, Industry and Environment
Decommissioning	The removal of solar panels and ancillary infrastructure and/or rehabilitation of the site
EA	Environmental Assessment, and Modification Reports
EIS	Environmental Impact Statement
EMS	Environmental Management Strategy
EPA	Environment Protection Authority (Previously DECCW and/or OEH)
EP&A Act	<i>Environmental Planning and Assessment Act 1979</i> (NSW)
EPBC Act	<i>Environment Protection and Biodiversity Conservation Act 1999</i> (Cwth)
Feasible	Feasible relates to engineering considerations and what is practical to build or implement
GHG	Greenhouse gas
GWh	Gigawatt hours
ha	Hectares
HSE Manager	Health, Safety, and Environment Manager
ISEPP	<i>State Environmental Planning Policy (Infrastructure) 2007</i> (NSW)
km	Kilometres
kV	Kilovolts
m	Metres
m ³	Cubic metres
MW	Megawatts
NEPC	National Environment Protection Council
NML	Noise Management Level

NPW Act	<i>National Parks and Wildlife Act 1974 (NSW)</i>
NSW	New South Wales
NOW	NSW Office of Water
O&M	Operations and maintenance
PMP	Project Management Plan
POCR	Pre-operation Compliance Report
POEO Act	<i>Protection of the Environment Operations Act 1997 (NSW)</i>
Reasonable	Reasonable relates to the application of judgement in arriving at a decision, taking into account: mitigation benefits, cost of mitigation versus benefits provided, community views and the nature and extent of potential improvements
RFS	NSW Rural Fire Service
RMS	Roads and Maritime Services
RTS	Response to Submissions
SoC	Statement of Commitments in Environmental Assessment
Sp./spp.	Species/species (plural)
The Project	Suntop Solar Farm
The Proponent	Suntop Solar Farm Pty Ltd
Vegetation	Any native trees, shrubs or grassland.

1 INTRODUCTION

1.1 Purpose

Bouygues Construction Australia Pty Ltd (BYCA) has prepared this Accommodation and Employment Strategy (AES) as a part of the project’s conditions of approval (CoA) requirements.

The NSW Department of Planning, Industry and Environment (DPIE) issued approval for the modified project on the 11 October 2019. The CoA # 29 includes a requirement for the AES. CoA #29 states:

Prior to the commencement of construction, the Applicant must prepare an Accommodation and Employment Strategy for the development in consultation with Council and to the satisfaction of the Secretary. This strategy must:

- (a) *propose a strategy to facilitate the accommodation of the workforce associated with the development, with consideration of the cumulative impacts associated with other State significant development projects in the Dubbo Regional LGA constructed concurrently;*
- (b) *investigate options for prioritising the employment of local workers for the construction and operation of the development where feasible; and*
- (c) *include a program to monitor and review the effectiveness of the strategy over the life of the development.*

Following the Secretary’s approval, the Applicant must implement the Accommodation and Employment Strategy.

The location of information in this AES addressing the requirements of CoA is identified below (Table 1).

Table 1 Location of information addressing CoA 29

CoA	Condition requirement	Location
Schedule 3 CoA 29	<i>Prior to the commencement of construction, the Applicant must prepare an Accommodation and Employment Strategy for the development in consultation with Council and to the satisfaction of the Secretary.</i>	The AES Section 1.2
	<i>This strategy must:</i>	
CoA 29(a)	<i>propose a strategy to facilitate the accommodation of the workforce associated with the development, with consideration of the cumulative impacts associated with other State significant development projects in the Dubbo Regional LGA constructed concurrently</i>	Section 5 Section 3.3
CoA 29(b)	<i>investigate options for prioritising the employment of local workers for the construction and operation of the development where feasible</i>	Section 4
CoA 29(c)	<i>include a program to monitor and review the effectiveness of the strategy over the life of the development</i>	Section 4.2 Section 0



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Accommodation and Employment Strategy

Id no.: CSI-SU-BY-
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The objectives of the AES are:

- Propose a strategy to facilitate the accommodation of the workforce associated with the development, with consideration of the cumulative impacts associated with other State significant development projects in the Dubbo Regional LGA constructed concurrently.
- Options for prioritising the employment of local workers for the construction and operation of the development.
- Contribute positively towards the local socio-economy.
- Increased employment – there is the potential for local employment to be generated during the construction phase where suitable local contractors and labour hire are available.
- Stimulation and diversification of the local economy creating greater resilience.
- Developing regional skills in renewable energy technology.

The Proposal will also provide socio-economic benefits by generating up to 350 construction jobs during peak construction periods and will support six to ten operational jobs during the 30 year life of the solar farm. It will encourage regional development through expenditure by personnel in the Wellington region during construction.

1.2 Consultation

BYCA consulted with Dubbo Regional Council in the development of this Accommodation and Employment Strategy. The draft Strategy was provided to Council on 20 January 2020 by email. Council provided feedback to BYCA on the draft Strategy on 28 February 2020 by email (Appendix A). Council's comments have been addressed as described in Appendix B.

DPIE feedback was provided 3 April 2020. DPIE comments have been addressed as described in Appendix C.

1.3 Document Responsibilities

This AES must be in place and operational prior to commencement of construction work.

The project dedicated Senior Project Manager in conjunction with the Project Director, will ensure that the plan is monitored, reviewed, maintained and updated as necessary and kept up to date during the course of the project.

One hardcopy of this strategy will be maintained by the Senior Project Manager (document-controlled revision) for the duration of the contract.

1.4 Revision Status

Revision	Revision Date	Issued Date	Nature of modification
0	2020/01/07	2020/01/16	Contract Award revision
1	2020/03/19		Address Dubbo Regional Council feedback
2	2020/04/16		Address DPIE feedback
3			
4			

1.5 Discipline Specific Plans

The AES is to be read in conjunction with the below mentioned Management Plans. The AES includes the following Management Plans to be developed in the time frames as noted within the contract agreement and to enable site works to commence as quickly as possible:

PL-CO-01 Project Management Plan	PL-HS-01 Safety Management Plan
PL-CO-02 Project Execution Plan	PL-HS-02 Traffic Management Plan
	PL-HS-03 Office Emergency Management Plan
PL-CO-04 Risk Management Plan	PL-EV-01 Environmental Management Plan
PL-CO-05 Emergency Management Plan	PL-EV-05 Air Quality Plan
	PL-EV-06 Noise and Vibration Management Plan
PL-CO-07 BYCA Objectives and Targets	PL-EV-07 Cultural Heritage Plan
PL-CO-08 Contract Management Plan	PL-EV-09 Fire Management Plan
PL-CO-10 Stakeholder Management Plan	PL-QA-02 Records Management Plan
PL-CO-11 Construction Methodology Plan	PL-HR-01 Resources Management Plan
PL-CO-12 Site Management Plan	
PL-CO-13 Site Establishment Management Plan	

1.6 Legal Requirements

BYCA will ensure that relevant legislation, Codes of Practice and Standards relating to the project are accessible to all persons via the BYCA File Directory located at: **P:\01 Corporate\73 00.**

1.7 Contractual Requirements

Contractual requirements specific to each project are identified at the tender stage and then taken into account during project delivery.

For each project BYCA requires all its Service Providers to comply with all requirements stated including but not limited to; General HSE Requirements (contract specification), Project HS Risk Assessment, Project Environmental Risk Assessment, Project Induction, and Project Rules.

1.8 Definitions

BYCA	Bouygues Construction Australia Pty Ltd.
EMP	Environmental Management Plan
SWMS	Safe Work Method Statement
ITP	Inspection and Test Plans
KPI	Key Performance Indicator

NCR	Non Conformance Report
AES	Accommodation and Employment Strategy
HR	BYCA's Human Resource Department

1.9 Responsibilities and Authorities

The Project Team responsibilities and authorities are detailed on the BYCA Project Responsibilities and Authorities document; please refer to ***FS-CO-RR-03 BYCA Project Responsibilities & Authorities***.

For Subcontracted work, subcontractor's responsibilities shall be specified as part of their contract agreement and on their Subcontractor Management Plans (when required).

2 PROJECT DESCRIPTION

2.1 *Project overview*

The project is to construct a large scale solar PV system which is expected to generate 395 GWh (enough to meet the energy needs of around 65,000 homes). The project is located at 909 Suntop Road, located approximately 10 km west of Wellington, south of Dubbo in regional New South Wales.

Project would cover an area of 472 hectares and is estimated to consist of up to 520,000 PV panels installed on a single axis tracking system which would follow the movement of the sun through the course of the day and the PV structure would be fixed on a mounting structure.

Construction would also include 2 x site access (as per DA) into the site, related electrical infrastructure and other ancillary works including an on-site substation, inverter stations, connection to overhead transmissions lines, fencing and landscaping works. An upgrade to the intersection of Suntop Road and Renshaw McGirr way would also be undertaken to facilitate safe access during construction of the Proposal.

2.2 *Workforce generation*

2.2.1 **Construction**

The construction of the project will be undertaken by Bouygues Construction Australia (BYCA) supported by locally based contractors and subcontractors. It is estimated the project will require around 350-400 workers at the peak of construction. Approximately 270 labourers, 80 electricians and technicians and 20 miscellaneous contractors (such as BYCA construction manager and foreman, WHS personnel, surveyors, security and machinery operators) will be required. Employment numbers will fluctuate starting with about 30 workers on site for one to two months. Worker numbers then progressively increase to 350 staff at about the 65% completion stage for several months before tailing off toward completion and the start of commissioning. About 5-10 staff are required for commissioning.

The workforce would be sourced from the local area where possible, and the wider region where worker deficits arise. A high proportion of local workers is considered a likely outcome, given ABS data indicates the Wellington locality has a higher proportion of labourers, trade persons and trade technicians than the State average (Table 1).

It is expected the peak period would extent for approximately four months. Outside of this period, approximately 30-40 workers will be required at any one time.

It is expected workers who need to travel to Wellington will reside in temporary local accommodation during construction. As local workers would be prioritised, it is expected the demand for local accommodation generated by the project would be reduced.

2.2.2 **Operation**

Operation of Suntop Solar Farm will be conducted by Suntop Solar Farm Pty Ltd, or subcontractor. It is expected the Suntop Solar Farm will require up to 10 employees once operational. Commonly one to two people will visit the site two to three times per week to conduct routine maintenance of fuses and other electrical equipment. A team of about five to six people may come from Sydney or Melbourne on fly in visits of one to two days to assess the operation of the farm and adjust key software and electrical components as required.

These fly in staff positions typically require dedicated, specialists who are experienced with the ongoing management requirements of solar farms. It is unlikely these positions would be filled locally. However, a range of inputs would be sourced from local businesses, such as fuel, electrical components, chemicals, etc.

In addition, routine maintenance will be conducted by locally employed staff typically with an electrical trade certification. These staff will often service more than one solar farm as part of their duties.

3 LOCAL REGION

3.1 Regional economic profile

At the 2016 census, the (former) Wellington LGA had a population of approximately 9,000 and an area of 4113sq. km. The population of the former Wellington LGA was projected to grow to 9,550 people by 2036 (Dubbo Regional Council Area Population Projections, 2016).

The median age of people in 2016 in Wellington town was 44 years (Australian Bureau of Statistics, 2017a). Children aged 0 – 14 years made up 18.7 percent of the population and people aged 65 years and over made up 15.8 percent of the population (Australian Bureau of Statistics, 2017a). In 2016, 1,576 people in the Wellington township reported being in the labour force in the week before Census night.

The most common occupations in the Wellington township 2016, Wellington LGA 2011 and the Western Plains Regional LGA 2016 (since renamed to Dubbo Regional Local Government Area) are provided in the tables below.

Table 1 – Occupation and Industry of employment for Wellington township, NSW and Australia 2016 (ABS, 2017a)

	Wellington township	%	NSW	%	Australia	%
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Occupation

(Employed people aged 15 years and over)

Community and Personal Service Workers	256	21.6	350,261	10.4	1,157,003	10.8
Labourers	175	14.8	297,887	8.8	1,011,520	9.5
Technicians and Trades Workers	166	14.0	429,239	12.7	1,447,414	13.5
Professionals	153	12.9	798,126	23.6	2,370,966	22.2
Sales Workers	126	10.6	311,414	9.2	1,000,955	9.4
Clerical and Administrative Workers	118	10.0	467,977	13.8	1,449,681	13.6
Machinery Operators and Drivers	91	7.7	206,839	13.5	670,106	6.3
Managers	83	7.0	456,084	13.5	1,390,047	13.0

Industry of employment

(Top responses)

Aged care residential services	68	6.1	67,209	2.0	211,621	2.0
Correctional and Detention Services	62	5.5	7,878	0.2	27,656	0.3
Takeaway Food Services	59	5.3	56,957	1.7	189,447	1.8
Supermarket and Grocery Stores	53	4.7	74,487	2.2	254,275	2.4

Local Government Administration	50	4.5	43,378	1.3	142,724	1.3
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Table 2 – Occupation and Industry of employment for Wellington, NSW and Australia 2011 (ABS, 2013)

	Wellington LGA 2011	%	NSW	%	Australia	%
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Occupation

(Employed people aged 15 years and over)

Managers	654	21.5	418,333	13.3	1,293,970	12.9
Professionals	450	14.8	713,548	22.7	2,145,442	21.3
Community and Personal Service Workers	434	14.3	297,667	9.5	971,897	9.7
Labourers	378	12.4	273,129	8.7	947,608	9.4
Technicians and Trades Workers	328	10.8	414,668	13.2	1,425,146	14.2
Clerical and Administrative Workers	301	9.9	473,141	15.1	1,483,558	14.7
Sales Workers	241	7.9	290,496	9.3	942,140	9.4
Machinery Operators And Drivers	189	6.2	199,438	6.4	659,551	6.6

Industry of employment

(Top responses)

Sheep, Beef Cattle and Grain Farming	460	15.2	39,486	1.3	120,143	1.2
School Education	199	6.6	138,795	4.4	467,373	4.6
Public Order and Safety Services	145	4.8	48,826	1.6	156,404	1.6
Cafes, Restaurants and Takeaway Food Services	111	3.7	127,711	4.1	412,804	4.1
Local Government Administration	106	3.5	40,770	1.3	136,792	1.4

Table 3 – Occupation and Industry of employment for Western Region, NSW and Australia 2016 (ABS, 2017b)

	Western Plains Regional LGA 2011	%	NSW	%	Australia	%
Occupation						
(Employed people aged 15 years and over)						
Professionals	3,882	17.5	798,126	23.6	2,370,966	22.2
Technicians and Trades Workers	3,170	14.3	429,239	12.7	1,447,414	13.5
Clerical and Administrative Workers	2,873	13.0	467,977	13.8	1,449,681	13.6
Managers	2,868	13.0	456,084	13.5	1,390,047	13.0
Community and Personal Service Workers	2,811	12.7	350,261	10.4	1,157,003	10.8
Labourers	2,460	11.1	297,887	8.8	1,011,520	9.5
Sales Workers	2,380	10.8	311,414	9.2	1,000,955	9.4
Machinery Operators and Drivers	1,330	6.0	206,839	6.1	670,106	6.3
Industry of employment						
(Top responses)						
Hospitals (except Psychiatric Hospitals)	995	4.5	119,350	3.5	411,808	3.9
Primary Education	629	2.8	65,204	1.9	231,198	2.2
Other Social Assistance Services	543	2.5	54,259	1.6	158,230	1.5
Takeaway Food Services	535	2.4	56,957	1.7	189,447	1.8
Supermarket and Grocery Stores	505	2.3	74,487	2.2	254,275	2.4

The Census data for Wellington township shows labourers make up the second largest proportion of employed people within the Wellington town, with a higher proportion of Labourers than the New South Wales average. It is noted Wellington has a larger proportion of Community and Personal workers and smaller proportion of Professionals than the rest of the state. Both the Macquarie Correctional Centre and Wellington Correctional Centre are within close proximity to Wellington, leading to Correctional and Detention Services employing a greater proportion of the local population in Wellington than the rest of the state.

Key economic activities within the former Wellington LGA (ABS, 2013)

Key economic and employment sectors in the Wellington district include agriculture, retail trade, healthcare and social assistance, education and training, accommodation and food services, and construction.

Agriculture

Agriculture is the dominant land use and economic activity in the Wellington district. Most of the land employed for agricultural use is used for dryland cropping and livestock production. The majority of farming enterprises in the Wellington district are mixed farms, which helps to spread financial risk and improve land management. There are a diverse range of services available in Wellington to support the agricultural sector, such as: spraying, contract harvesting, consultants, veterinary, silos and storage. The crops produced are determined by the climate / weather, expected availability of water, market demand and commodity prices. Common crops include cereals, oilseeds, and legumes. Livestock production in Wellington includes mainly cattle and sheep (pitt&sherry, 2018).

Some agricultural workers will have relevant trades and skills that can be applied to the construction of the Suntop solar farm. Given current prolonged drought conditions, some agricultural workers in the locality could be underemployed or unemployed.

Retail

Retailing is concentrated in the centre of the township of Wellington, while outlying villages such as Mumbil and Stuart Town also rely on the retail facilities in Wellington. The performance of the retail sector is very closely tied with the performance of the agricultural sector.

The retail sector in Wellington is comprised primarily of small businesses or businesses employing between one and four people. Types of retail businesses in Wellington include fast food outlets, automotive sales and repairs, clothing and footwear, speciality retail and fresh food (pitt&sherry, 2018).

Healthcare and social assistance

Within Wellington the main service areas are health care, aged care and childcare. Health care services are concentrated in Wellington and like most inland rural areas, the town has struggled to attract and retain doctors, dentists, nurses and health care professionals (pitt&sherry, 2018).

Education and Training

Educational facilities are listed in Table 2 below.

Accommodation and Food Services

Dubbo Regional Council lists 33 accommodation and food service businesses within Wellington.

Construction

Types of construction businesses in Wellington include design and assessment, site preparation, building and construction and trade installation (e.g. plumber or electrician).

3.2 Regional facilities and services

The town of Wellington comprises existing facilities and services, shown in table 4 below

Table 4 – Community services and facilities available in the Wellington LGA (Dubbo Regional Council)

Type	Facilities and Services in Wellington
Health and medical facilities	<ul style="list-style-type: none"> Wellington Hospital - < 50 beds including Emergency Wellington Aboriginal Health Services General Practitioners Dental Allied and Alternative Health Services including – Psychology / Counselling, Optometrist, Homeopathy Ambulance station.
Emergency Services	<ul style="list-style-type: none"> SES: Wellington Local Headquarters Wellington Police station Wellington Fire Station Ambulance station NSW Rural Fire Service
Retail and Services	<ul style="list-style-type: none"> Wellington is a sub-regional centre providing a range of retail, commercial, professional and personal services. Wellington shopping centre is anchored by Coles and Woolworths supermarkets with a range of smaller speciality retailers.
Fuel stations	<ul style="list-style-type: none"> Shell Caltex BP Morley N H Metro Petroleum
Grocery stores	<ul style="list-style-type: none"> Woolworths and Coles Independent and specialty stores
Automotive Mechanics	<ul style="list-style-type: none"> J&J Mechanical Wellington Auto Service Toyota Service Gersbachs Mechanical
Sport and recreational facilities	<ul style="list-style-type: none"> Pool – 50m outdoor / Two children’s pools Playing Fields Netball Courts Tennis Courts Showground Golf Course Skate Park Lake Burrendong State Park – land and water-based activities Parks and Reserves including picnic facilities, playgrounds and walking trails Lawn Bowls Wellington bowling club.
Cultural and Entertainment Facilities	<ul style="list-style-type: none"> Wellington Civic Centre Licensed Clubs & Hotels Art Galleries Wellington Library.
Religious facilities	<ul style="list-style-type: none"> Wellington Anglican Church Wellington Catholic Church Wellington Baptist Church Wellington Uniting Church Salvation Army.

Children’s Services	<ul style="list-style-type: none"> • Wellington Youth Services • Wellington Community Children’s Centre Inc • Pre-schools and long day care • Family day care • Playgroups.
Community Services	<ul style="list-style-type: none"> • Counselling • Community housing • Community transport • Information and Neighbourhood Services.
Education facilities	<ul style="list-style-type: none"> • One Secondary School (Public) • Two Primary Schools – (Public) • Two Primary Schools (Catholic and Christian) • Pre-schools • Interest / Activity based tuition – music, dance.
Aged Care Facilities	<ul style="list-style-type: none"> • Bellhaven Aged Care Facility (47) Beds • Maranatha House (73 Beds) • Home and Community Care Services and Transport • Meals on Wheels • Wellington Senior Citizens Centre.
Events	<ul style="list-style-type: none"> • Wellington Antique Vintage Fair • Wellington Boot Racing Carnival weekend • Annual Wellington Show • Cobb Loaf Festival
Tourism and Attractions	<ul style="list-style-type: none"> • Wellington Caves • Lake Burrendong State Park • Burrendong Arboretum • Mt Arthur Reserve (walking trails) • Oxley Historical Museum • Osawano Japanese Gardens • Galleries • Parks and Reserves • Macquarie River • Cobb & Co Heritage Trail

Nearby Dubbo, as regional centre, comprises many of the same services and facilities based in Wellington, with a greater number and range of those services. Dubbo additionally has higher order services.

Social and economic benefits experienced by Wellington may extent to Dubbo as well, as the closest large centre.

3.3 Cumulative impacts

Due to the size and nature of Suntop Solar Farm, potential cumulative impacts with other major projects must be considered. Cumulative impacts can include traffic generation, accommodation requirements, disposal of construction waste and supply of local labour.

In addition to this project, there are eleven (11) State Significant Developments within the Dubbo Regional LGA according to the DPIE Major Projects website. Two of these are complete and five are currently under assessment, and pose no cumulative impacts for local employment and accommodation with the Project. No cumulative local employment and accommodation impacts are considered likely to arise between the Project and the Maryvale Solar Farm, Wellington Solar Farm and Dubbo Zirconia Mine. Minimal cumulative impact could occur with the Dubbo Base Hospital Redevelopment Stage 4, which is underway and scheduled for

completion in 2021. However, skills and trade requirements differ to those required for Suntop Solar Farm. Refer Table 5 on the following page.

Table 5 – State Significant Developments in Dubbo Regional LGA

State Significant Development	Approvals Status as at March 2020	Potential to interact with Suntop Solar Farm construction
Dubbo Quarry Continuation Project	Preparation of SEARS	No cumulative impact likely, not yet approved.
Mumbil Solar Farm	Preparation of EIS	No cumulative impact likely, not yet approved.
Uungula Wind Farm	Preparation of EIS	No cumulative impact likely, not yet approved.
Suntop Stage 2 Solar Farm	Preparation of EIS	No cumulative impact likely, not yet approved.
Wellington North Solar Farm	Under Assessment	No cumulative impact likely, not yet approved.
Maryvale Solar Farm	Approved 04/10/2019	No cumulative impact likely, awaiting grid connection approval, not under construction.
Wellington Solar Farm	Approved 11/12/2018	No cumulative impact likely, engineering procurement contractor not yet appointed for construction, low potential for overlap..
Dubbo Base Hospital Redevelopment (DBHR) Stage 3/4	Mod 1 Approved 29/10/2019	Minimal cumulative impact, DBHR Stage 3 completed. DBHR Stage 4 is underway and scheduled for completion in 2021, skills and trade requirement different to Suntop Solar Farm.
Dubbo Zirconia Mine	Approved 28/05/2015	No cumulative impact likely, Mining operations underway, low number of permanent employees are already in place at the mine. Workforce skills sets for operation of a mine and the construction of a solar farm are very different.
Dubbo Hospital Redevelopment Stage 1/2	Mod 1 Approved 18/11/2014	No cumulative impact possible, Project completed 2015.
Bodangora Wind Farm	Approved 30/08/2013	No cumulative impact possible, Project completed 2019.

Green cell shading: No likely cumulative impact

Yellow cell shading: Minimal likely cumulative impact.

Nearby projects that may have cumulative impacts with Suntop Solar Farm are evaluated in the table below.

Table 6 – Developments that are proposed to be carried out within the Dubbo LGA (pitt&sherry, 2018)

Project	Cumulative construction impacts	Cumulative operational impacts
<p>Wellington Solar</p> <p>This includes the construction, operation and decommissioning of a photovoltaic (PV) solar farm that would produce up to 174 MW of electricity.</p> <p>The project site is approximately 2km to the north of Wellington on the Goolma Road and is approximately 15 km from the Suntop Solar Farm.</p>	<p>No cumulative impacts likely to occur during the construction phase; the Wellington Solar Farm is likely to commence construction several months after Suntop Solar Farm. The peak periods of construction activity are not expected to overlap.</p> <p>Cumulative construction impacts may include:</p> <ul style="list-style-type: none"> • Local labour may not be available to fulfill both projects. Refer to Section 4 and 6.2 • Local accommodation may not be available to accommodate all non-local workers on both projects. Notwithstanding it is intended to use local workers in the first instance. Refer to Section 5 and 6.1 • Additional construction traffic causing congestion along haulage routes, increased collision risk, damage to road infrastructure and associated noise from additional traffic. • Generation of additional waste. Local waste disposal centres may not be able to accommodate waste disposal from both projects during construction; however, this is unlikely. <p>See further details on the following page.</p>	<p>No substantial, cumulative operational phase impacts with Suntop Solar Farm.</p>
<p>Dubbo Base Hospital Redevelopment Stage 3/4</p> <p>Stage 4 includes the demolition of existing buildings and construction of a three-storey clinical building, new carparking, ambulance driveway and hospital entry. Dubbo Hospital has a site area of 13.48 ha and is located 1.5 km north-east of Dubbo CBD. The site is approximately 46 km north of wellington and approximately 62 km by road and 45 km straight line from the Suntop site.</p>	<p>Stage 3 was completed in 2019, and Stage 4 is currently under construction with an expected completion in 2021. According to the supporting environmental assessments, the project requires approximately 150 workers overall.</p> <p>Cumulative construction impacts may include:</p> <ul style="list-style-type: none"> • Local labour may not be available to fulfill both projects • Local accommodation may not be available to accommodate all non-local workers on both projects. notwithstanding it is intended to use local workers in the first instance. • Additional construction traffic causing congestion along haulage routes, increased collision risk, damage to road infrastructure and associated noise from additional traffic. 	<p>There are no relevant cumulative operational phase impacts with Suntop Solar Farm.</p>

See further details on the following page.
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Access to local labour

The construction of major projects concurrently may result in a labour shortage within Wellington and the wider region. In the event of limited local labour, additional workers from outside the area may be required to be utilised.

It is unlikely that the peak month/s would occur at the same time for two or more major projects due to many wide-ranging factors. Therefore, local workers who are winding down their involvement with one local project, can become a steady resource stream for the next local project.

Where possible, BYCA would reach out to relevant construction companies and subcontractors involved in the Dubbo Base Hospital Redevelopment projects, with an invitation to move onto the Suntop Solar Farm as that project winds down.

As a last resort, the construction phase may proceed at a less intensive pace where a shortage of labour cannot be remedied.

Local accommodation

Several projects under construction at once may adversely impact local accommodation through an increase in demand. This impact will be managed through the use of this Accommodation and Employment Strategy by prioritising employment of the local labour force who would not need temporary accommodation, and through coordination with local accommodation providers.

Traffic generation

Suntop Solar Farm is located south of Wellington, with a designated heavy vehicle route from the Mitchell Highway to the Suntop Solar Farm is via Bushrangers creek Road, Renshaw McGirr Way and Suntop Road, as identified in the Traffic Impact Assessment. Workers on the site would also utilise this route.

Both the Wellington Solar farm is located to the north of Wellington, requiring access to the Mitchell Highway and Golden Highway.

Both highways are State roads, with significant capacity to cater for construction and operational traffic as well as being key freight routes designated as '*oversize, over mass load carrying vehicles network approved roads*' by the Roads and Maritime Services. The potential for noise, collisions or other damage to the road infrastructure will be not substantially increased as a result of both projects potentially proceeding together. The impacts will be temporary and manageable with the implementation of safeguards as discussed in the Traffic Impact Assessment.

4 EMPLOYMENT STRATEGY

4.1 *Local Employment Opportunities*

It is BYCA's vision and commitment to create a workforce that fosters diversity and equity. In order to strengthen the local community engagement and have positive social-economic impact, BYCA shall perform following actions;

- BYCA would focus on exhausting the local available workforce from Wellington, Dubbo and surrounds in the first instance as a key part of our project strategy. Drought affected farmers and contractors could play a significant role.
- Preference will be local labour hire, however, if local labour does not wholly fulfil the requirements, other companies in the region/state shall be selected. For a project of this nature, these companies typically establish a local presence for the duration of the project, and take on any local workers where possible. Establishing a local presence also provide economic benefits to local businesses through the purchase of goods and services.
- Partnerships will be sought with local and surrounding area job network agencies and training organisations to create pathways for local job seekers and ensure suitable local workers are given priority. BYCA will continue to engage with local labour hire companies such as Spinifex and Workpac, both based in Dubbo, to identify access pathways to local workers.
- Where available BYCA includes local companies in our tenders, and award local contractors for as many packages as possible (civil, site office cleaning, etc.)
- BYCA will provide training for local workers where possible and appropriate to reduce the need for non-local workers.

4.2 *Recruitment Strategy and Labour Availability*

It is expected the construction workforce would comprise of the following skills and disciplines:

- Construction manager and foreman
- OHS personnel
- Surveyors
- Operators for the following machinery:
 - Earth moving equipment
 - Pile drivers
 - Road construction equipment
- Laser/string line workers
- Tracker and module installers
- Trenchers and cable layers
- Electricians
- General labourers and
- Security personnel.

BYCA understands and acknowledges that due to the specialised nature of the job, a high volume of suitable labour would be required for this project and also the potential of other projects taking place in the Dubbo/Wellington area with overlapping timeframes that could place added demand on the available workforce.

In addition to the above, BYCA, in consultation and coordination with the project proponent, will set up a dedicated employment opportunity platform on Project’s homepage which can be accessed via <https://suntopsolarfarm.com.au/>

4.3 Assessment Centre methodology:

In coordination with BYCA HR, an assessment centre methodology will be adopted with the aim to target the required local talent as priority. Aim and benefits of this methodology:

- Designed to assess the best talent in the current market.
- Methodology shall be implemented in BYCA head office (North Sydney) and BYCA HR will lead this methodology in coordination with local available employment agencies.
- With this methodology, interested candidates will learn more about BYCA as an organization, about the project, requirements of the roles and also view footage of our previously completed solar farms which will provide them with an insight of the construction process and phasing of the project.
- Each candidate will complete a number of different assessments to determine the best position for each one

5 ACCOMMODATION STRATEGY

5.1 On-site Accommodation

On-site accommodation through the use of temporary or demountable accommodation was not considered viable due to space considerations on the subject land. It is considered the safety of workers may be at risk should they reside in and around the live plant. This would also raise additional amenity and environmental impacts on the community not originally accounted for in the Environmental Impact Statement and subsequent assessment/approval.

5.2 Short Term Accommodation in Wellington

BYCA’s preferred and obvious choice for accommodation is the town of Wellington, due to its close proximity to Suntop Solar Farm being less than an hour drive from site.

There are a variety of accommodation options within Wellington including five motels, five hotels, and three caravan parks providing cabins, onsite caravans and camping facilities. There is also the possibility to utilise Bed and Breakfast facilities or rent a house through an accommodation website such as Stayz.

Table 7 – Short-term accommodation options in Wellington

Establishment	Rooms in total
Cow & Calf Hotel	20
Central Hotel Wellington	10
Wellington Hotel	16
Federal Hotel	15
Grand Hotel Wellington	19
Bridge Motel Wellington and Garden Court Motor Inn (combined)	36
Hermitage Hill Country Retreat	13
Wellington Motor Inn	11
Motel Mandalay	22
Wellington Valley Caravan Park	17 cabins
Wellington Riverside Caravan Park	12 cabins and 6 rooms
Wellington Caves Caravan Park	11 cabins
Total	208 rooms/cabins

Based on the known capacity of some accommodation providers in the locality, it is broadly estimated there are approximately 162 rooms across the ten hotels and motels in Wellington (approximately 16.2 per establishment on average). Given an average occupancy rate of 58.9% in Central NSW (Destination NSW,

2014), approximately 66 rooms could be available for non-local workers associated with the Suntop Solar Farm project. Additionally, three caravan parks in Wellington could potentially provide a further 19 cabins, assuming a similar occupancy rate.

5.3 Rental Accommodation

In the 2016 Census (ABS, 2017a), it was reported 566 occupied dwellings in Wellington township were rental properties. Approximately 40 rental properties available in Wellington and 200 in Dubbo at the time of preparing this AES. Private dwellings have an average of 3.3 bedrooms, which would equate to potentially 132 available rooms in Wellington and 660 in Dubbo (ABS, 2017a).

AirDNA lists 140 houses and rooms are available within the Dubbo LGA on AirBNB and Vrbo. Seventy-six percent (76%) of these are homes, with an average of 2.2 bedrooms (AirDNA, 2020). Note that BYCA will preference local workers, and these would not require temporary accommodation.

5.4 Short Term Accommodation in Dubbo

Accommodation options in Dubbo would also be considered due to the relative close proximity to the project site, being less than an hour drive. Dubbo has over 40 accommodation options including 32 motels, 7 hotels and 5 caravan and holiday parks that would be able to cater for potential overflow of workers who can not find accommodation within Wellington.

5.5 Transportation to Site

To minimise the traffic influx, workers will be transported in buses and encouraged to carpool from accommodation to site. Through this strategy, and with reference to the Traffic Management Plan, there will be limited disturbance to the local community or any impact on the local traffic. In addition to this, BYCA will adhere to Traffic Management plan.

6 LOCAL ACCOMMODATION AND EMPLOYMENT ACTIONS

6.1 Action plan to prioritise local accommodation

In the first instance, BYCA will preference local workers, and these will not require temporary accommodation.

Where local accommodation is required for workers, BYCA will adopt the following strategies to prioritise local accommodation, to maximise the benefit to the local community and minimise any adverse effects to the local community.

Table 8 – Action plan to prioritise local accommodation

Action	Timing	Responsibility	Documented
Explore available accommodation options in Wellington and Dubbo to accommodate the workers (Section 5).	Prior to construction	Site Manager	AES
Prioritise practical local accommodation options.	Prior to construction	Site Manager	AES
Investigate any community noticeboards and community social media channels to disseminate information to local accommodation operators and rental property owners, such as construction timing, workforce estimates and accommodation requirements.	Prior to construction	HR Manager	Diary note Monthly construction reporting Newspaper advertisements Notices and Leaflets
BYCA to investigate hosting a field day/information evening with local businesses regarding construction timing, workforce estimates and accommodation requirements.	Prior to construction	Site Manager HR Manager	Diary note Monthly construction reporting
Contact local accommodation operators to disseminate details such as construction timing, workforce estimates and accommodation requirements.	Prior to hiring/engagement phase	HR Manager	Local accommodation register Diary note Monthly construction reporting
Secure rooms with local accommodation operators for contractors and subcontractors to take up. Direct	Prior to construction Construction	HR Manager	Diary note Monthly construction reporting



hired contractors and subcontractors to these options in the first instance.			
Provide a register of local accommodation options and contact details to contractors and subcontractors.	When hired/engaged	HR Manager	Local accommodation register Monthly construction reporting
Maintain a register of property owners and property managers who have expressed interest in renting out dwellings in the local area. Provide this register to hired contractors and subcontractors.	Prior to construction Construction	HR Manager	Local accommodation register Monthly construction reporting
Review workforce and accommodations requirements monthly during construction to ensure the objectives of the AES are being met	Construction	Senior Project Manager Site Manager HR Manager	Monthly construction reporting
If persistent accommodation shortages arise, review use of temporary or demountable accommodation.	Prior to construction Construction	Senior Project Manager Site Manager HR Manager	Monthly construction reporting
Identify and engage with any upcoming major works to avoid peak periods of workforce requirements	Construction	Senior Project Manager Site Manager	Diary note Monthly construction reporting
Provide agreed, contractors and subcontractors details to upcoming major works.	Construction Post-construction	HR Manager	Local employment register Diary note Monthly construction reporting

**6.2 Action plan
to prioritise**

local employment

Table 9 – Actions to prioritise local employment

Action	Timing	Responsibility	Document
Dedicated head office Human Resource (HR) team will prioritise the capture of suitable workers from the local area, followed by the region and State.	Prior to construction Construction	HR manager	AES
Engage local media including radio, newspaper and social media to advertise expressions of interest for employment or provision of services or material	In the months prior to construction	HR manager	Diary note Monthly construction reporting
BYCA to investigate hosting a field day/information evening to engage with the community, local businesses who can provide inputs or services and other prospective contractors/subcontractors, regarding construction timing, workforce estimates and accommodation requirements.	Prior to construction	Site Manager HR Manager	Diary note Monthly construction reporting
Consult with the local business/commerce chamber to disseminate information through their website, email database and social media channels, to provide local businesses who can provide inputs or services and other prospective contractors/subcontractors, with details such as construction timing, workforce estimates and accommodation requirements.	Prior to construction Construction Operation	HR Manager	Diary note Monthly construction reporting
Investigate any community noticeboards and community social media channels to disseminate information to the community, local businesses that can provide inputs or services and prospective contractors/subcontractors, with details such as construction timing, workforce estimates and accommodation requirements.	Prior to construction Construction	HR Manager	Diary note Monthly construction reporting
BYCA, in consultation and coordination with the project proponent, will set up a dedicated employment	Prior to construction	Site Manager HR Manager	Diary note Monthly construction reporting



opportunity platform on Project's homepage which can be accessed via https://suntopsolarfarm.com.au/			
BYCA will continue to engage with local employment agencies such as Spinifex and Workpac, both based in Dubbo, to identify access pathways to local workers. Using the Assessment Centre Methodology, and together with the local employment agencies, BYCA will assess the candidate pool to determine suitable labour, trade or other employment on the project.	Prior to construction	HR Manager together with local employment agencies	Local employment register Diary note Monthly construction reporting
Identify positions where training would allow additional local workers, and encourage local workers and businesses to undertake training to provide for specialist works	Prior to construction Construction Operation	HR Manager	Local employment register Diary note
Provide opportunity for local businesses to submit proposals and tenders	Prior to construction Construction Operation	Procurement officer Procurement team	BYCA procedures Local employment register Diary note
Engage with key BYCA staff to identify opportunities to for local goods and services to be tendered/procured	Prior to construction Construction Operation	Site Manager Procurement officer Procurement team	Local employment register Diary note Monthly construction reporting
Use local presence as a criteria when awarding contracts to subcontractors	Prior to construction Construction Operation	Site Manager Procurement officer Procurement team	BYCA procedures Local employment register Diary note
Prioritise the use of goods and services that can be sourced locally and are competitive for price and quality	Prior to construction Construction Operation	Site Manager Procurement officer	BYCA procedures Local employment register Diary note
Encourage subcontractors to utilise local workers and materials	Prior to construction Construction Operation	Site Manager Procurement officer	BYCA procedures Local employment register Diary note



With their agreement, contractors and subcontractors who have completed their scope of work will be added to a register of local workers, which can be provided to any other upcoming major works. This would assist to streamline the process of hiring for major works.	Construction Post-construction	HR Manager	Local employment register Diary note Monthly construction reporting
Review proportion of local and non-local contractors and re-direct efforts where local contractors fall below 75 percent	Construction	Senior Project Manager HR Manager	BYCA procedures Local employment register Monthly construction reporting

7 MONITORING

7.1 Document Amendment and Distribution

This document shall be reviewed as follows:

- Monthly prior to, and during, the construction phase and quarterly thereafter,
- When there is a change of method and/or technology that may affect the accuracy of this document;
- When there has been a significant event to which this document was relevant; or
- As a result of a Non-Conformance resulting from an audit.

Table 10 Monthly review during construction shall involve the following:

Action	Responsibility
Secure rooms with local accommodation operators for contractors and subcontractors to take up. Direct hired contractors and subcontractors to these options in the first instance.	HR Manager
Ensure a register of local accommodation options and contact details has been provided to hired contractors and subcontractors in the preceding month.	HR Manager
Ensure a register of property owners and property managers who have expressed interest in renting out dwellings in the local area has been maintained. If agreed to have details advertised, ensure this register has been provided to hired contractors and subcontractors in the preceding month.	HR Manager
Review workforce and accommodation requirements monthly during construction to ensure the objectives of the AES are being met.	Senior Project Manager Site Manager HR Manager
Identify and engage with any upcoming major works to avoid peak periods of workforce requirements	Senior Project Manager Site Manager
With their agreement, ensure a register is maintained of local and non-local contractors and subcontractors who have completed their scope of work in the preceding month. This will be provided to any other upcoming major works. If taken up, local workers can remain employed and non-local workers can remain in the locality and extend their use of local accommodation.	HR Manager
Ensure local media, business chambers, community noticeboards and community social media channels have been engaged in the preceding month to advertise expressions of interest for employment or provision of services or material.	HR manager
Ensure employment opportunity platform remains active on Project's homepage https://suntopsolarfarm.com.au/	Site Manager HR Manager
Continue work with local employment agencies such as Spinifex and Workpac, both based in Dubbo, to identify access pathways to local workers.	HR Manager together with local employment agencies

Ensure that, together with the local employment agencies, the candidate pool has been assessed in the preceding month using the Assessment Centre Methodology, and to determine suitable labour, trade or other employment on the project.	
Ensure continued opportunities for local businesses to submit proposals and tenders. Ensure EOIs, proposals and tenders are distributed to relevant staff.	Procurement officer Procurement team
Check in with key BYCA staff to assess where local goods and services have been procured. Identify opportunities to for other local goods and services.	Site Manager Procurement officer Procurement team
Monthly review of proportion of local and non-local contractors and re-direct efforts where local contractors fall below 75 percent	Senior Project Manager HR Manager

Table 11 Quarterly review post-construction shall involve the following:

Action	Responsibility
With their agreement, ensure a register is maintained of local and non-local contractors and subcontractors who have completed their scope of work in the preceding month. This will be provided to any other upcoming major works. If taken up, local workers can remain employed and non-local workers can remain in the locality and extend their use of local accommodation.	HR Manager
Ensure local media, business chambers, community noticeboards and community social media channels have been engaged in the preceding month to advertise any expressions of interest/tenders for provision of services or inputs.	Site Manager Procurement officer
Ensure continued opportunities for local businesses to submit proposals and tenders. Ensure EOIs, proposals and tenders are distributed to relevant staff.	Procurement officer Procurement team
Check in with key staff to assess where local goods and services have been procured. Identify opportunities to for other local goods and services.	Site Manager Procurement officer

Document amendments and distribution will be conducted as per required.

Revision details shall be recorded in Section **1.4 Revision Status** of this plan.

All changes to documents shall be reviewed and approved by the same function that performed the original review and approval and as per the cover of this plan, unless specifically designated otherwise.

8 REFERENCES

AirDNA LLC, (2020), *Analyze 139 Vacation Rentals in Dubbo Regional Council*, Accessed March 2020, <https://www.airdna.co/vacation-rental-data/app/au/new-south-wales/dubbo-regional-council/overview>

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Australian Bureau of Statistics, (2017a), *2016 Census QuickStats: Wellington Urban (UCL)*, Accessed March 2020, https://quickstats.censusdata.abs.gov.au/census_services/getproduct/census/2016/quickstat/UCL115150?opendocument

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Bureau of Meteorology (BOM), (2019), *Climate Statistics for Australian Locations: Monthly Climate Statistics -Summary Statistics Wellington (D&J Rural)*, Accessed March 2020, , http://www.bom.gov.au/climate/averages/tables/cw_065034.shtml

Destination NSW, (2014), *WELLINGTON Local Government Area Tourist Accommodation Profile*, Accessed March 2020, , <https://www.destinationnsw.com.au/wp-content/uploads/2014/03/Wellington-LGA-accommodation-profile.pdf>

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APPENDIX A DUBBO REGIONAL COUNCIL CONSULTATION

From: Stephen Howlett [mailto:Stephen.Howlett@dubbo.nsw.gov.au]
Sent: Friday, 28 February 2020 2:53 PM
To: GEOFFROY, Fabrice <F.GEOFFROY@bouygues-construction.com>
Cc: Chelsea Milles <chelsea.milles@canadiansolar.com>; IMTIAZ, Awais <A.IMTIAZ@bouygues-construction.com>;
VERMAN, Piers <P.Verman@bouygues-construction.com>
Subject: RE: Submission Under DA for Suntop Solar Farm - SSD 8696

Good afternoon Fabrice,

Please see below comments from Dubbo Regional; Council's Manager Growth Planning, Steven Jennings, about the Accommodation and Employment Strategy.

If you have any questions, please contact either Steven or Carmel O'Connor, Senior Growth Planner, on 6801 4000.

Thanks,

Stephen

SUNTOP SOLAR FARM - ACCOMMODATION AND EMPLOYMENT STRATEGY

The preparation of an Accommodation and Employment Strategy (AES) in consultation with Council is a requirement of condition 29 of the subject Development Consent issued by the Department of Planning Industry and Environment. The condition states as follows:

29. Prior to the commencement of construction, the Applicant must prepare an Accommodation and Employment Strategy for the development in consultation with Council, and to the satisfaction of the Secretary. This strategy must: (a) propose a strategy to facilitate the accommodation of the workforce associated with the development, with consideration of the cumulative impacts associated with other State significant development projects in the Dubbo Regional LGA constructed concurrently; (b) investigate options for prioritising the employment of local workers for the construction and operation of the development where feasible; and (c) include a program to monitor and review the effectiveness of the

strategy over the life of the development. Following the Secretary's approval, the Applicant must implement the Accommodation and Employment Strategy

Council has reviewed the Suntop Solar Farm AES dated 7 January 2020 prepared by Bouygues Construction and makes the following recommendations regarding its content.

- The current regional and economic structure of Wellington

The AES should provide a description of Wellington's position in the region? The local economic profile including key industries, local employment makeup and current local unemployment rates.

- Existing facilities and services of Wellington

The AES should provide a general overview of the local facilities and services available within Wellington.

- Workforce Generation and Employment Strategy

The AES should identify the estimated construction and operational workforce generation including proposed construction staging and associated employment demands. The AES should also include an Employment Strategy with the aim of maximising the employment of local workers so as to optimise local economic benefits and reduce short-term accommodation requirements.

The Strategy should identify the labour and skills required and how this aligns with the local economic profile of Wellington above as well as actions required to maximise the employment of local skilled workers including the use of local subcontractors, advertising of tenders, training of local workers where possible etc.

- Accommodation Strategy and Consultation

The AES should identify accommodation options for the duration of project construction. The Applicant should also consult with local accommodation providers to identify: peak periods of demand, occupancy rates and other developments or business operations that might impact demand for short term accommodation.

The Strategy should also include actions to support the use of short-term accommodation within Wellington and should identify accommodation and transport options should insufficient accommodation be available in Wellington including any accommodation requirements for delivery drivers if relevant.

- Interaction with other approved State Significant Developments

In accordance with the Condition of Consent, the AES should consider any cumulative impacts associated with approved State Significant Developments in the Dubbo Region LGA. In this regard the AES should address any overlaps in demand for workers or short term accommodation and services.

- Monitoring and Review

The AES should include actions regarding monitoring and regular review to ensure effectiveness throughout construction and to provide opportunities for update in line with external feedback and or changes in construction progress and or employment figures.

- Ongoing consultation evidence

It is considered that the document provided to Council for consideration does not include any information or evidence supporting the claims made in the document. The document mentions that consultation has been undertaken with local real estate agents, however there is no evidence provided of this consultation or indeed any 'real world data' to back up the claims made in the Strategy.

Stephen Howlett
Manager Infrastructure Strategy and Design
Dubbo Regional Council
P 02 6801 4920 M 0428 639 206
E Stephen.Howlett@dubbo.nsw.gov.au

<http://dubbo.nsw.gov.au>

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From: GEOFFROY, Fabrice <F.GEOFFROY@bouygues-construction.com>
Sent: Monday, 20 January 2020 5:47 PM
To: Stephen Howlett <Stephen.Howlett@dubbo.nsw.gov.au>; Dubbo Regional Council <council@dubbo.nsw.gov.au>
Cc: Chelsea Milles <chelsea.milles@canadiansolar.com>; IMTIAZ, Awais <A.IMTIAZ@bouygues-construction.com>; VERMAN, Piers <P.Verman@bouygues-construction.com>
Subject: Submission Under DA for Suntop Solar Farm - SSD 8696

[EXTERNAL Message: Be cautious of clicking on links or opening attachments.]

Dear Mr. Stephan Howlett,

I am writing to inform you that Bouygues Construction Australia Pty Ltd has been awarded a contract to perform Early Works Contract by the owner M/s Canadian Solar (Australia) Pty Ltd. To Comply with our contract requirement and with Development Consent of Suntop Solar Farm, please find attached following documents and their intended purpose;

1. Traffic Management Plan – for Consultation
2. Landscape Management Plan – For consultation (surrounding landowners have been consulted already and their feedback is included in the LMP)
3. Accommodation & Employment Strategy – For consultation

I would appreciate your response in this regard.

Should you have any query, please contact undersigned at;

➤ Email: F.GEOFFROY@bouygues-construction.com

➤ Phone no. 0402 333 429

Thank you.

Best regards

Fabrice GEOFFROY

Sr Project Manager Solar Farm

T. 612 8458 12009 – M. 61 402333429

E. F.geoffroy@bouygues-construction.com

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APPENDIX B RESPONSE TO DUBBO REGIONAL COUNCIL COMMENTS

Table 10 – Feedback provided by Dubbo Regional Council and BYCA response

Council comment	BYCA response
<p>The current regional and economic structure of Wellington</p> <p>The AES should provide a description of Wellington’s position in the region? The local economic profile including key industries, local employment makeup and current local unemployment rates.</p>	<p>The economic profile of Wellington and the region include key industries, sectors and employment types is addressed in Section 3.1 of the updated AES.</p>
<p>Existing facilities and services of Wellington</p> <p>The AES should provide a general overview of the local facilities and services available within Wellington.</p>	<p>A general overview of the local facilities and services in Wellington, and Dubbo as the closest regional centre, is addressed in Section 3.2 of the updated AES.</p>
<p>Workforce Generation and Employment Strategy</p> <p>The AES should identify the estimated construction and operational workforce generation including proposed construction staging and associated employment demands. The AES should also include an Employment Strategy with the aim of maximising the employment of local workers so as to optimise local economic benefits and reduce short-term accommodation requirements.</p> <p>The Strategy should identify the labour and skills required and how this aligns with the local economic profile of Wellington above as well as actions required to maximise the employment of local skilled workers including the use of local subcontractors, advertising of tenders, training of local workers where possible etc.</p>	<p>The workforce generation and employment strategy is addressed in Section 2.2 and Section 4 of the updated AES. This includes strategies to maximise local employment and reduce short-term accommodation requirements, as well as how the Wellington-specific labour force characteristics are generally compatible with the Suntop Solar Farm workforce needs.</p>
<p>Accommodation Strategy and Consultation</p> <p>The AES should identify accommodation options for the duration of project construction. The Applicant should also consult with local accommodation providers to identify: peak periods of demand, occupancy rates and other developments or business operations that might impact demand for short term accommodation.</p> <p>The Strategy should also include actions to support the use of short-term accommodation within Wellington and should identify accommodation and transport options should insufficient accommodation be available in Wellington including any accommodation requirements for delivery drivers if relevant.</p>	<p>Notwithstanding a strong strategy around employing locally, both directly and through local subcontractors, an accommodation strategy is outlined in the AES. Accommodation options and strategies are addressed in Section 5 of the updated AES. This include identification of different accommodation options, capacity, occupancy/availability and cumulative demand.</p>

<p>Interaction with other approved State Significant Developments</p> <p>In accordance with the Condition of Consent, the AES should consider any cumulative impacts associate with approved State Significant Developments in the Dubbo Region LGA. In this regard the AES should address any overlaps in demand for workers or short-term accommodation and services.</p>	<p>The potential interaction of the Suntop project with other State Significant Developments in the Dubbo Regional LGA is addressed in Section 3.3 of the updated AES.</p>
<p>Monitoring and Review</p> <p>The AES should include actions regarding monitoring and regular review to ensure effectiveness throughout construction and to provide opportunities for update in line with external feedback and or changes in construction progress and or employment figures.</p>	<p>Monitoring and review points for the local employment and local accommodation actions are address in Section 4.2 and Section 5.6.</p>
<p>Ongoing consultation evidence</p> <p>It is considered that the document provided to Council for consideration does not include any information or evidence supporting the claims made in the document. The document mentions that consultation has been undertaken with local real estate agents, however there is no evidence provided of this consultation or indeed any ‘real world data’ to back up the claims made in the Strategy.</p>	<p>Consultation with Dubbo Regional Council has been conducted by BYCA (Appendix A). Council’s feedback was incorporated into the AES as outlined above. Further documented consultation is not required by the COA; however, BYCA would continue to liaise with local providers to facilitate local employment and to accommodate any workers from outside of Wellington.</p> <p>BYCA conducted in person meetings with a small number of local providers.</p> <p>The updated AES is appropriately referenced, with data from reputable, publicly available sources.</p> <p>The AES meets the requirements in the COA for the project, in terms of proposing a strategy to facilitate the accommodation of the workforce, consideration of the cumulative impacts associated with other SSD projects in the LGA that may be constructed concurrently, prioritisation of local hiring and employment and a monitoring and review program.</p>

APPENDIX C RESPONSE TO DPIE COMMENTS

Table 11 – Feedback provided by DPIE 3 April and BYCA response

Accommodation & Employment Strategy - condition 29, Schedule 3	Satisfactory (Yes/No/Partial)	Comment	Action Required	Company Response	Where addressed in this document
Prior to the commencement of construction, the Applicant must prepare an Accommodation and Employment Strategy for the development in consultation with Council, and to the satisfaction of the Secretary. This strategy must:					
developed in consultation with Council	Yes				
(a) propose a strategy to facilitate the accommodation of the workforce associated with the development, with consideration of the cumulative impacts associated with other State significant development projects in the Dubbo Regional LGA constructed concurrently	Partial	Section 3.3 Table 5 and 6 outlines other SSDs and potential impacts, but no mention of cumulative accommodation impacts, no mention of specific strategies such as information nights/field days etc	Describe how you will document implementation of table 5 and action plan in section 5.2	Changes made to Table 5 to clarify cumulative impacts, minimal cumulative impacts are anticipated due to the current stage of other SSD projects. Section 6 added including description of how implementation of Table 5 (now Table 9) and Section 5.2 (now Table 8).	Section 3.3 Section 6
(b) investigate options for prioritising the employment of local workers for the construction and operation of the development where feasible	No	Section 4	Describe/identify strategies to prioritise local employment. Identify how many contractors/sub/ workers required for each task/speciality (ie: trenching/piling/labour/electrical etc)	Identified how many workers likely required for each task at peak construction in Section 2.2. Section 6 added including description of strategies to prioritise local employment in Table 9.	Section 2.2. Section 6
(c) include a program to monitor and review the effectiveness of the strategy over the life of the development	No	Section 1.4 – mentioned document review, not addressed adequately	Program monitoring to assess/review effectiveness of the strategy	Section 1.4 has been moved to Section 7 and expanded upon to ensure certain actions are undertaken. Section 6 has also been expanded to describe how actions will be documented.	Section 7 Section 6