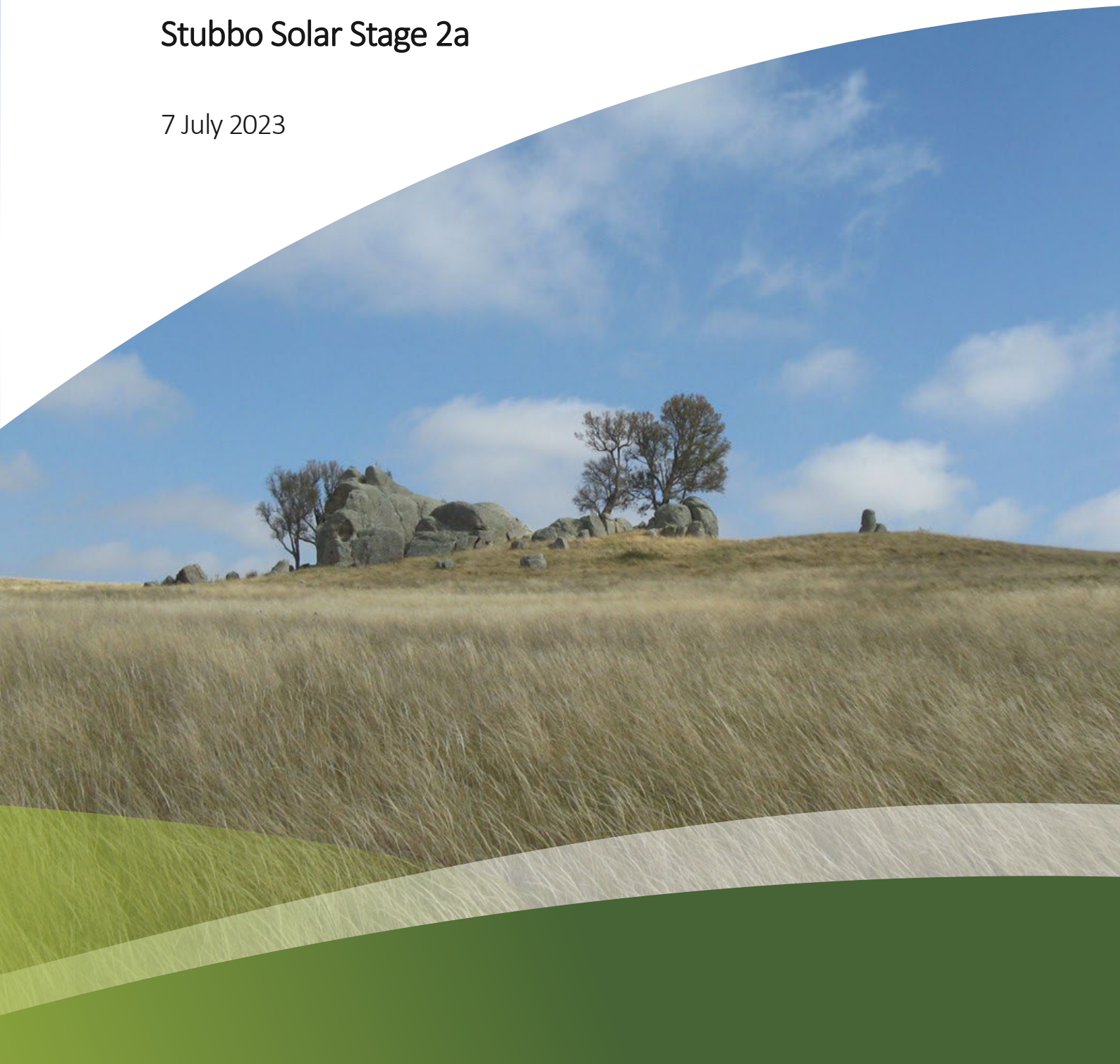




Accommodation and Employment Strategy

Stubbo Solar Stage 2a

7 July 2023



Accommodation and Employment Strategy

Stubbo Solar Stage 2a

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Executive Summary

Statutory requirements and other commitments

The Development Consent for the Stubbo Solar Project, granted in June 2021, contains several Conditions of consent relevant to this Accommodation and Employment Strategy (AES), as shown in Table ES 1.

Table ES 1 Development Consent Conditions relevant to this AES

No.	Condition	Reference
Schedule 3 – Environmental Conditions – General		
33	<i>Prior to commencing construction, the Applicant must prepare an AES for the development in consultation with Council, and to the satisfaction of the Secretary. This strategy must:</i>	This document
33a	<ul style="list-style-type: none"> propose measures to ensure there is sufficient accommodation for the workforce associated with the development; 	Section 7
33b	<ul style="list-style-type: none"> consider the cumulative impacts associated with other State significant development projects in the area and tourism activity; 	Section 6
33c	<ul style="list-style-type: none"> investigate options for prioritising the employment of local workers for the construction and operation of the development, where feasible; and 	Sections 8 and 11.2
33d	<ul style="list-style-type: none"> include a program to monitor and review the effectiveness of the strategy over the life of the development, including regular monitoring and review during construction. 	Section 12
Following the Planning Secretary's approval, the Applicant must implement the AES.		

Additional to this, the Environmental Impact Statement (EIS) prepared by Ramboll Australia Pty Ltd (Ramboll) in 2020 contains commitments, management measures and mitigation measures relevant to the preparation of the AES. These are included in Section 2 of the AES. There were no relevant commitments in the Amendment report.

While preparing the EIS, ACEN made additional commitments to Mid-Western Regional Council (MWRC) to address the issue of accommodation and employment, including the following three step strategy:

- Step 1: Initial assessment for the purpose of the EIS (Social Impact Assessment), which included meetings with local stakeholders in the first half of November 2020.
- Step 2: Post EIS-lodgement, on-going consultation with local stakeholders, registration of interest of contractors, coordination with the Central West Orana Renewable Energy Zone (CWOREZ) body for cumulative impacts, discussion regarding training with local TAFE.

- Step 3: Once an EPC Contractor is selected, finalisation of the assessment and implementation of all actions identified in Steps 1 and 2. This includes the preparation of an AES as required by the NSW Government and hosting employment fairs in Gulgong.

Although the requirement for a Social Impact Assessment was already in the Secretary's Environmental Assessment Requirements (SEARs) for the project, ACEN decided to take the issue further than was required by the SEARs as:

- the issue of workforce availability and accommodation was raised by some members of the community during the community drop-in session held on 28 October 2020
- Council had indicated a willingness to address this issue in the context of the CWOREZ where cumulative impacts can be expected in the next years
- a draft of the AES was provided to MWRC for their consideration on 19 May 2023. On 6 June 2023 MWRC responded to the draft AES with a letter endorsing the AES.

In 2021 and 2022, ACEN engaged EMM Consulting regarding project-related socioeconomic matters (2022a), associated risks and their possible mitigation or management. Matters included rental availability, rental vacancy rates, estimation of room numbers across accommodation types, labour market characteristics, regional events, other major projects in the area and risk assessments and mitigation (local employment and procurement, housing and accommodation, and community wellbeing/access to services).

Project description

Stubbo Solar, a State Significant Development, is a 400-megawatt (MW) solar project with 200 MW/200 MW-hour (MWh) of battery storage located approximately 10 kilometres (km) north of Gulgong in the Central West and Orana (CWO) Region of NSW. The project will be developed across a 1,250-hectare site of cleared grazing land and will include rows of solar panels, electrical infrastructure, a substation, cables and battery system, access roads and other associated infrastructure.

The project will generate enough renewable energy to power 185,000 average Australian homes per year and contribute to Australia's domestic and international commitments of renewable energy development, including NSW's target of 50% renewable energy by 2030.

Construction is planned to commence in May 2023 and be completed in mid-2025.

AES objectives

The key objectives of the AES for the Stubbo Solar development are as follows:

- PCL, Transgrid and their subcontractors will facilitate the preservation of MWR LGA's short-term hotel and motel accommodation by prioritising other types of short-term accommodation and accommodation in other localities, noting there will be some use of these facilities in MWR LGA by people visiting the site for up to a week (e.g., auditors, specialist consultants, company executives, etc.)

- prioritise clusters of accommodation in Mudgee and Gulgong as well as further afield (if required) to minimise traffic impacts and facilitate shuttle services between accommodation and site
- prioritise use of local accommodation within a 90-minute drive from the project site to reduce impact on short-term and long-term accommodation demand
- reduce or avoid temporary housing stress impacts that may result from the project
- prioritise procurement and employment of local businesses and workers where available
- avoid construction delays to mitigate any cumulative impacts with CWOREZ project construction, and
- monitor and adapt the accommodation strategy throughout the construction phase regarding workforce needs, impacts on localities and in response to stakeholder feedback.

Workforce estimates

The overall anticipated number of construction workers on site will be in the order of 520 people at the peak of construction. The workforce will be comprised of local workers and non-local workers and are defined as follows:

- **Local workers:** workers already resident in the region within commuting distance (estimated to be up to 154 workers)
- **Non-local EPC contractors:** non-local EPC contractor site personnel (comprising up to 21 managers during the peak construction period)
- **Other non-local workers:** workers not resident in the region who will temporarily relocate to the region and reside within it to fulfil work requirements (estimated to be 363 workers)

The workforce required for construction is shown in Table ES 2. Works are scheduled to commence in May 2023 and be completed March 2025. Construction tasks include:

- civil works
- solar array construction
- security system installation and commissioning
- weather station installation and verification
- commissioning (electrical, SCADA and inverter)
- validation testing.

The indicative schedule of the required civil works and the estimated workforce numbers and targets for local personnel are shown in Table ES 2. MWRC has indicated in various meetings with ACEN and Accent that there is a current scarcity of local suitably skilled workers from within the MWRC LGA as the majority are already employed on various local projects. MWRC envisages this situation will continue for the foreseeable future.

It is assumed that local workers from the MWRC, DRC and WSC LGAs are already accommodated and are unlikely to require short-term or long-term accommodation and have

therefore have not been considered further in relation to accommodation needs. This AES considers the accommodation needs of the non-local workforce only (estimated to be 363 construction workers and up to 21 PCL workers). The peak construction period is assumed to be from November 2023 to August 2024 inclusive (10 months) when the estimated workforce exceeds 50% of the total workforce (i.e., is greater than 260 personnel) as shown in Table ES 2.

Table ES 2 Estimated personnel and local employment targets for the construction phase

Timing	Non-local personnel Peak (estimate)			Local personnel peak (estimate)			Worker percentage (%)		PCL site personnel	Total personnel (estimate)
	Civil	Electrical	Mechanical	Civil	Electrical	Mechanical	Non-local	Local		
May 2023	5	2	0	26	0	0	21	79	3	36
June 2023	5	2	0	26	0	0	21	79	3	36
July 2023	4	2	5	21	0	1	33	67	3	36
Aug 2023	6	5	10	30	1	1	40	60	5	58
Sep 2023	8	16	16	40	2	2	48	52	8	92
Oct 2023	12	30	45	60	2	3	57	43	15	167
Nov 2023	20	50	75	100	3	5	57	43	21	274
Dec 2023	21	90	90	105	9	9	62	38	21	345
Jan 2024	21	90	90	105	13	13	61	39	21	353
Feb 2024	24	140	120	120	16	14	65	35	21	455
Mar 2024	23	184	138	115	22	17	69	31	21	520
Apr 2024	18	207	138	92	25	17	73	27	21	518
May 2024	18	207	138	92	25	17	73	27	21	518
Jun 2024	12	180	140	60	20	16	78	22	21	449
Jul 2024	11	158	105	53	18	12	77	23	21	378
Aug 2024	6	138	83	28	18	11	80	20	21	305
Sep 2024	2	105	44	9	9	4	87	13	17	190
Oct 2024	1	72	30	6	6	3	87	13	12	130
Nov 2024	1	48	20	4	6	3	84	16	8	90
Dec 2024	1	30	13	3	4	2	83	17	5	58
Jan 2025	0	10	5	1	2	1	79	21	2	21
Feb 2025	0	10	5	1	2	1	79	21	2	21
Mar 2025	0	10	5	1	2	1	79	21	2	21

Approximately 10 full-time equivalent employees will be required during operation and ongoing maintenance of the solar project.

Cumulative impacts

Cumulative impacts may occur if the construction phases of nearby major projects overlap in part, or in full with the construction of Stubbo Solar. Potential cumulative impacts due to large-scale projects running concurrently have been considered in the Stubbo Solar EIS (Ramboll 2020) and for the Central-West Orana REZ (EnergyCo 2023). Impacts can include competition for local accommodation and services (negative), economic benefits, investment in local communities and the possible migration of skilled workers to the area to work across consecutive projects (positive).

In particular, the potential concurrent construction of the Wollar Solar Farm may impact workforce and accommodation availability, impact regional road networks with additional vehicle movements and place extra demand on local services. These impacts would be dependent on the final timing and duration of construction activities associated with the two projects.

The combined number of construction workers requiring accommodation are shown in Table ES 3. It is likely that the construction periods for up to five renewable energy projects and one mining project may overlap with the Stubbo Solar project (Wollar Solar Farm, Liverpool Range Wind Farm, Wellington North Solar Farm, Barneys Reef Wind Farm and Tallawang Solar Farm).

It is unlikely the peak construction periods for the projects will overlap exactly as projects are subject to multiple factors influencing start dates and milestone delivery which in turn influences a variety of project requirements including workforce needs.

It is expected that the contribution of the Stubbo Solar project to the cumulative impacts on accommodation and employment from broader development in the region can be managed effectively if:

- the measures for addressing accommodation, employment and other associated impacts outlined in Section 11.1 are implemented
- communication is maintained with MWRC and the proponents of developments in the region regarding cumulative impacts and their management, as set out in the Community Engagement Plan.

Table ES 3 Non-local SSD workers requiring accommodation

Project	Estimated personnel requiring accommodation (a 90% non-local worker ratio has been applied to the personnel figures)		
	2023	2024	2025
Stubbo Solar	Up to 222	Up to 384	17
Wollar SF*	360	66	0
Uungala WF [#]	Not known	Up to 270 ³	Not known
Wellington North Solar Farm**	Up to 125	Up to 110	Up to 15
Liverpool Range WF	0	200-800	Not known
Barneys Reef WF	-	-	85
Tallawang SF	-	-	108
Bowdens Silver	288	Not known	Not known
Valley of the Winds WF	-	0***	0***
Birriwa Solar	-	-	0***
Dunedoo SF	Not known	Not known	Not known
Bellambi Heights SF	-	-	Not known
Maryvale Solar Farm	Not known	Not known	Not known
Total No. of workers	995	760 – 1,360	225

Sources: *Umwelt (2022a) and **Based on Figure 1.3 and a proposed start month of April 2023, Umwelt (2022b). ***Source: ACEN – A workers camp solution is proposed for worker accommodation and [#]ACEN – A workers camp solution is proposed as part of the accommodation solution.

In addition to renewable energy projects, there are three coal mines within a 20km radius of the Stubbo Solar site. Non-local mine workers are accommodated at the Ulan Village Green Camp or mine-owned properties in the area. There is no capacity for renewable energy workers at the Ulan Village Green Camp. General information for the mines is shown in Table ES 4.

Table ES 4 Summary of coal mining activity in Mid-Western Regional LGA

Mine	No. Employees	Area (ha)	Extraction limits	Location	Operations
Ulan	660	7,820	20 M tonnes/pa	25 km NE Gulgong	24/7
Moolarben	650	2,790	16 M tonnes/pa	25 km NE Gulgong	24/7
Wilpinjong	700	2,800	16 M tonnes p/a	48 km NE Mudgee	24/7

Non-local workers for these mines are unlikely to impact accommodation availability for Stubbo Solar and are not considered further.

Accommodation strategy

Accommodation options such as purpose-built, temporary worker camps and local community members renting out rooms or ancillary dwellings are a major consideration by EnergyCo for accommodating the CWOREZ workforce and the workforces of associated renewable energy projects (EnergyCo 2023). These options are at the feasibility stage and will likely not be available to the non-local Stubbo Solar workforce. Accommodation will be sought primarily in MWR LGA with possible options considered further afield in DR LGA and WSC LGAs.

A review was undertaken of available accommodation in the local area (up to a 90-minute commute by car, minibus or shuttlebus) to identify options and actions to ensure there is sufficient accommodation for the Stubbo Solar non-local construction workers whilst safeguarding accommodation availability to service the tourism and agribusiness sectors in the MWR LGA. Expressions of interest from local accommodation providers have been received through the Stubbo Solar website (ACEN 2023) and through events such as Employment Information days and these are also included in accommodation estimates. It is likely that this activity has resulted in the addition of new landlords and properties to the local rental market.

It is likely sufficient accommodation options have been identified within MWR LGA to house the estimated 363 non-local workers with sufficient capacity to accommodate some of the non-local workforce from Wollar Solar Farm. However, accommodation options in the DR, MWR and WS LGAs were also reviewed as a precaution. This additional review identified potential options for accommodating the peak construction period non-local Stubbo Solar workforce should numbers exceed those estimated.

For the purposes of this AES:

- short-term accommodation includes hotels, motels, self-contained units, serviced apartments, caravan parks/holiday parks and accommodation available through websites such as Airbnb and Stayz
- long-term accommodation includes privately-owned dwellings available under a formal lease agreement, boarding rooms in private residential dwellings, rooms in share houses (e.g., a co-renting agreement where shared spaces within a dwelling are separate from a private room), farm stays, caravan park and holiday park cabins
- a short-term stay is up to 6-months
- a long-term stay is over 6-months.

PCL, Transgrid and their subcontractors will work with local business owners and MWRC to minimise any adverse impacts on servicing tourism visitors needs as far as practicable, however, it is important to note that the development approval allows construction works to take place from Monday to Friday, between 7 am and 6 pm, and between 8 am and 1 pm on Saturdays, unless the Secretary agrees otherwise.

To ensure minimal impact on tourism accommodation needs in MWR LGA, Stubbo Solar construction workers will seek types as follows and as shown in Table ES 5:

- Up to 9% of workers housed in private room in a local home (31 workers in total and 31 rooms) – note if more property owners are willing to rent rooms during the construction period, this number could increase.

- Up to 6% of workers housed in alternative private accommodation (24 workers in total)
- Up to 65% of workers housed in a managed property in the Mudgee-Gulgong area (assuming 3 bedrooms per rental and 1 person per room) (237 workers in a total of 88 dwellings)
- Up to 5% of workers housed in Mudgee-Gulgong caravan and holiday parks (up to 18 workers and 18 cabins (assuming 1 person per cabin)
- Up to 15% of workers housed in Airbnbs etc. in the Mudgee-Gulgong area (up to 53 workers) (assuming each Airbnb has 3 bedrooms per property and 1 person per room, 18 dwellings in total)

Table ES 5 Indicative accommodation requirements for the Stubbo Solar non-local personnel

Month	Room in a private house ¹		Rental (agent-managed) dwelling in Gulgong-Mudgee ¹			Private camp-style accommodation ¹		Cabin in Gulgong – Mudgee area		Airbnb etc. in Gulgong – Mudgee area		No. non-local workers	Total non-local workers and managers accommodated
	Rooms	Workers	Rentals	Workers	Managers	Rooms	Workers	Cabins	Workers	Airbnbs	Workers		
May-	7	7 (2%)	1	0	3	0	0	0	0	0	0	7	10
Jun-23	7	7 (2%)	1	0	3	0	0	0	0	0	0	7	10
Jul-23	11	11 (3%)	1	0	3	0	0	0	0	0	0	11	13
Aug-23	21	21 (6%)	2	0	5	0	0	0	0	0	0	21	26
Sep-23	31	31 (9%)	3	0	8	9	9 (2%)	0	0	0	0	40	48
Oct-23	31	31 (9%)	11	32 (9%)	15	24	24 (6%)	0	0	0	0	87	102
Nov-23	31	31 (9%)	30	90 (25%)	21	24	24 (6%)	0	0	0	0	145	166
Dec-23	31	31 (9%)	49	146 (40%)	21	24	24 (6%)	0	0	0	0	201	222
Jan-24	31	31 (9%)	49	146 (40%)	21	24	24 (6%)	0	0	0	0	201	222
Feb-24	31	31 (9%)	77	229 (63%)	21	24	24 (6%)	0	0	0	0	284	305
Mar-24	31	31 (9%)	88	237 ² (65%)	21	24	24 (6%)	18	18 (5%)	12	35 (10%)	345	366
Apr-24	31	31 (9%)	88	237 ² (65%)	21	24	24 (6%)	18	18 (5%)	18	53 (15%)	363 ³	384
May-24	31	31 (9%)	88	237 ² (65%)	21	24	24 (6%)	18	18 (5%)	18	53 (15%)	363 ³	384
Jun-24	31	31 (9%)	88	237 ² (65%)	21	24	24 (6%)	18	18 (5%)	8	22 (6%)	332	353
Jul-24	31	31 (9%)	75	218 ² (60%)	21	24	24 (6%)	0	0	0	0	274	295
Aug-24	31	31 (9%)	59	171 ² (47%)	21	24	24 (6%)	0	0	0	0	227	248
Sep-24	31	31 (9%)	24	96 (26%)	17	24	24 (6%)	0	0	0	0	151	168
Oct-24	31	31 (9%)	16	48 (13%)	12	24	24 (6%)	0	0	0	0	103	115
Nov-24	31	31 (9%)	5	14 (4%)	8	24	24 (6%)	0	0	0	0	69	77
Dec-24	31	31 (9%)	2	0	5	12	12 (3%)	0	0	0	0	44	49
Jan-25	15	15 (4%)	1	0	2	0	0	0	0	0	0	15	17
Feb-25	15	15 (4%)	1	0	2	0	0	0	0	0	0	15	17
Mar-25	15	15 (4%)	1	0	2	0	0	0	0	0	0	15	17

Percentages are based on a peak of 363 non-local construction workers; the peak of 21 non-local workers will be accommodated in long-term rental accommodation in the Gulgong-Mudgee area.

¹As of 12 May 2023

²Some dwellings have one or two bedrooms rather than three (taken into account calculating the number of people accommodated)

³Total of 363 non-local construction workers excludes the 21 non-local management staff who will be accommodated in long-term rental accommodation.

Property type summary
Room in a private dwelling – 31
Private accommodation – 24
Rooms in agent-managed dwellings – 258
Cabins – up to 18
Rooms in an Airbnb – 53

As of May 2023, it is not anticipated that accommodation beyond the Mid-Western Regional LGA will be required to house non-local Stubbo Solar construction workers as sufficient short- and long-term accommodation has been sourced to meet peak non-local workforce requirements. In the unlikely event that some of the accommodation sourced becomes unavailable, short- and long-term accommodation may be sought further afield in locations including Dunedoo, Cassilis and Coolah (Warrumbungle Shire LGA) and Dubbo and Wellington (Dubbo Regional LGA).

The implementation of the indicative accommodation targets in Table ES 5 together with the strategies proposed by PCL and Transgrid will help minimise the impact of construction workers on local accommodation stock which may have otherwise been used to service tourism needs not only in MWR LGA but also in WS LGA and DR LGA.

Employment strategy

ACEN, PCL and Transgrid employment and procurement strategies are devised to generate positive social outcomes together with the efficient delivery of goods, services and works. Wherever possible, workers and businesses from the local and regional area will be prioritised for employment and contracting opportunities with the project to help maximise the benefits for local communities. To facilitate this, ACEN and PCL provide opportunities for local businesses to register their interest in providing goods and services to the project.

The consultation already undertaken with MWRC and available ABS 2021 Census data shows that overall unemployment is low in the area (1.8% in MWR LGA as of December 2022, as described in Section 4.4). MWRC has indicated there is a shortage of skilled workers within the LGA and it may be a challenge to meet aspirational local worker targets. Nevertheless, PCL proposes to implement the strategies listed in Table 11.1 in Section 11 to prioritise the employment of local workers for the construction and operation of the Stubbo Solar project.

Actions include:

- unbundling of large work packages to match local market capability (refer to the Stubbo Solar ICN portal)
- provision for tender evaluation criteria and weightings that prioritise (where experience and capability are comparable) local business participation as part of the procurement selection process
- advertise and market widely to ensure local suppliers have visibility over opportunities (e.g., employment information days, ICN portal, Gulgong/Mudgee local papers, Gulgong project office and the Stubbo Solar website)
- an online registration portal has been established for local businesses to register their interest (Stubbo Solar ICN portal and project website)
- hosting supplier forums during the procurement phase to encourage participation. Forums to include information such as expected tender release dates, guidance on how to submit tenders, overview of key evaluation criteria, minimum pre-qualification standards (e.g. events in Gulgong on 20 April 2023 and 26 July 2023)

- provisions to provide feedback to local businesses who submit unsuccessful tenders outlining why they were unsuccessful and suggesting improvements for future tenders – thereby providing information and opportunity for development of capability and long-term participation
- engagement and partnerships with government and industry providers to promote local business capability development, such as the ICN Gateway and commitments under the LTESA
- selection criteria and weightings embedded into recruitment and employment processes to prioritise local employment at or above 10%
- targeted local recruitment campaigns, such as the procurement phase supplier forums, promotion of recruitment opportunities in local papers, via local business networks, and in online community interest groups (e.g. Facebook groups)
- job readiness program with local employment agencies to identify suitable candidates and receive applications for advertised roles
- work experience programs for secondary education students
- targeted apprenticeships and traineeships for locals
- presentations at local schools and TAFE colleges aimed at awareness, education and generating interest for students to pursue a career in renewable energy.

Strategies

The strategies to be implemented for managing workforce accommodation, employment and other associated project impacts are set out below.

The actions described in Table ES 6 are proposed to support local and prioritise accommodation providers, businesses and local employment and minimise any negative impacts such as a reduction in tourist accommodation availability, during the planning and construction phases of Stubbo Solar.

ACEN has collated EOIs from local contractors, suppliers and individuals. These EOIs will be utilised by PCL and their engaged subcontractors to assist in engaging local personnel.

Table ES 6 Stubbo Solar accommodation strategies during construction

ID	Matter	Mitigation measure	Action	Responsible party	When	Compliance record
AES 01	Accommodation strategy required	Prepare accommodation strategy as required by Schedule 3 Condition 33 of the development consent.	Draft AES in consultation with MWR LGA.	Principal (ACEN) and EPC contractor (PCL)	Prior to construction	This AES and evidence of consultation with MWRC
AES 02	Implement AES and update as required	Implement approved AES throughout project.	Review and update AES as stated in Sections 1.7 and 12.	Principal, EPC Contractor, Site Administrator, Construction Personnel	Prior to and during construction	Compliance measures include but are not limited to: <ul style="list-style-type: none"> • this AES • evidence showing the attainment of accommodation and employment targets • zero accommodation and employment-related complaints in the complaints and grievances register
AES 03	Accommodation	Full-time EPC site staff will secure long-term	Leasing of up to seven (included in the total of 88 rentals required) local furnished houses for up to 12 months (various locations are actively being considered in	EPC Contractor full-time staff	Prior to construction	Lease records

ID	Matter	Mitigation measure	Action	Responsible party	When	Compliance record
		<p>accommodation in the region.</p> <p>EPC team – short-term visits (up to approximately 1 week).</p>	<p>consultation with Gulgong/Mudgee real-estate agents); and/or making long-term arrangements with accommodation providers in the MWR LGA and short-term accommodation other than hotels and motels in the Mudgee/Gulgong area.</p> <p>Visiting EPC team members will endeavour to stay in Mudgee or Gulgong at the listed accommodation provided in Appendix B.</p>	EPC contractor – short-term visits	EPC short-term visits: some will be scheduled (e.g. audits) whilst others will be as needed and ad hoc	Register of worker and accommodation forecasts
AES 04	Accommodation	Housing of short-term recruited non-local contractors.	<p>At the earliest possible opportunity, PCL will provide subcontractors with the lists attached in Appendix B to facilitate advanced bookings six weeks or less prior to requirement.</p> <p>Securing non-local workforce accommodation will be a contract clause.</p> <p>Accommodation requirements include:</p> <ul style="list-style-type: none"> ● rooms in private dwellings (31 as of May 2023 to date) ● alternative private camp-style accommodation (24 rooms) 	EPC Contractor; recruited non-local workers, Admin personnel	Prior to and during construction	<p>Staff housing records</p> <p>Workforce contract</p> <p>STRA ID numbers provided and recorded where appropriate</p>

ID	Matter	Mitigation measure	Action	Responsible party	When	Compliance record
			<ul style="list-style-type: none"> up to 18 beds in cabins up to 53 beds in Airbnb-style accommodation (up to 18 dwellings). 			
AES 05	Accommodation	Where practicable, lease rental properties on a yearly basis within the locality (mainly Mudgee and Gulgong) to cater for peak construction workforce.	<p>Lease furnished accommodation, up to 88 properties in the Mudgee and Gulgong areas in preparation for construction commencement.</p> <p>Furnish if appropriate. These properties would be used as shared accommodation for workers.</p> <p>Short-term housing to be compliant with State Environmental Planning Policy (Affordable Rental Housing) Amendment (Short-term Rental Accommodation) 2021 including STRA ID number where appropriate or other relevant legislation and regulations as appropriate.</p>	EPC contractor, Admin personnel	Prior to construction	Lease records
AES 06	Accommodation	Monitor pending accommodation requirements up to 6 weeks in advance together with key regional tourism events to identify and mitigate	<p>Establish and implement an ongoing monthly review process to monitor current and forecast pending workforce accommodation requirements.</p> <p>Monitoring of MWR LGA event calendar so that any changes or updates can applied to accommodation forecasts.</p>	EPC Contractor, Admin personnel	Monthly reviews throughout the Project with quarterly reporting	<p>Staff housing records, workforce contracts, STRA ID numbers</p> <p>Monthly records and register of worker and accommodation forecasts</p> <p>MWR, DR and WS LGA event calendars</p>

ID	Matter	Mitigation measure	Action	Responsible party	When	Compliance record
		periods of potential conflict.	Quarterly meetings between ACEN, PCL, Transgrid and MWRC at which the accommodation metrics and forecasts are reviewed (first meeting scheduled for July 2023).	ACEN		<p>Quarterly reports; recipients to include officials from ACEN, PCL and MWRC</p> <p>Stubbo Solar/MWRC meeting minutes</p> <p>Stubbo Solar/Wollar SF meeting minutes or notes</p> <p>Quarterly meeting minutes</p>
AES 07	Accommodation	Prioritise booking short-term accommodation (up to 6 weeks in advance) to reduce impacts on tourism in the region and liaise with accommodation providers to manage peak accommodation timing. Collaborate	<p>Book short-term accommodation through priority arrangements with accommodation providers in Mudgee and Gulgong. Establish a monthly review process to monitor worker accommodation requirements throughout construction.</p> <p>Note – Dunedoo, Coolah, Cassilis, Dubbo and Wellington short-term accommodation to be considered as a last resort should there be</p>	EPC Contractor, Admin personnel	Monthly reviews throughout the Project	<p>Monthly records:</p> <ul style="list-style-type: none"> • Non-local staff accommodation forecasts • Forecasts of tourist accommodation requirements (sourced from MWRC) • Short-term accommodation booking records (including date booked and dates of stay)

ID	Matter	Mitigation measure	Action	Responsible party	When	Compliance record
		with MWR LGA via their monthly accommodation meeting with providers.	insufficient accommodation in MWR LGA.			
AES 08	Accommodation	Manage internal human resources and hiring processes to encourage workers to share accommodation where practicable.	Establish and maintain a register of forecasted worker accommodation requirements and accommodation options to prioritise accommodation sharing or clustering. New hire onboarding project orientation will include accommodation sharing options and employee contact information to encourage employees to share.	EPC Contractor, Admin personnel	Throughout construction	Monthly records and register of worker and accommodation forecasts Onboarding procedure and records
AES 09	Accommodation	Manage worker accommodation to ensure available tourism accommodation is maintained at sufficient levels to service the local tourism industry.	Establish and maintain a register of regional events for MWR LGA and the localities of Dubbo, Wellington, Dunedoo, Cassilis and Coolah to identify potential periods of conflict with the construction schedule and mitigate accordingly. Liaise with MWRC and accommodation providers regarding pending major events to ensure sufficient accommodation is available for visitors.	EPC Contractor, Admin personnel	Throughout construction	Monthly records and register of worker and accommodation forecasts Locality events calendar Records of communication with MWRC and accommodation providers

ID	Matter	Mitigation measure	Action	Responsible party	When	Compliance record
			Hold quarterly accommodation update meetings between ACEN, PCL, Transgrid and MWRC (see Section 12.3) that include, as an agenda item, liaison with other solar/mining projects regarding their activities and accommodation implications.			Minutes from quarterly accommodation update meetings
AES 10	Accommodation	Ensure all non-local workers are informed not to stay in hotels in the Gulgong-Mudgee area to fulfil MWRC requirements and ensure local short-term accommodation is available to service the tourist industry.	<p>At the earliest possible opportunity, PCL will inform non-local workers not to seek local (Gulgong-Mudgee area) hotel and motel accommodation (auditors, specialist consultants and company executives etc. are exempt from this requirement).</p> <p>Establish and maintain a register of forecasted worker accommodation requirements and accommodation options to prioritise accommodation sharing or clustering within remits agreed with MWRC.</p> <p>Maintain an annual events calendar to indicate peaks of tourist activity.</p>	EPC Contractor, Admin personnel	Throughout construction	<p>Monthly records and register of worker and accommodation forecasts</p> <p>Up to date events calendar</p> <p>Worker induction records</p>
AES 11	Traffic management	Reduce the risk of worker commute congestion by encouraging	Encourage construction personnel at induction and toolbox meetings to increase the vehicle occupancy of light vehicles and reduce the	EPC Contractor,	Throughout construction	Induction procedure and records

ID	Matter	Mitigation measure	Action	Responsible party	When	Compliance record
		carpooling to the site where practicable.	<p>number of private vehicles travelling to and from the project.</p> <p>Require justification from any personnel seeking to use their own vehicle.</p> <p>Monitor the number of personnel using shuttle buses and light vehicles to access and leave the site. It will be the EPC Lead Construction Manager's responsibility to ensure that the correct staff travel by shuttle bus.</p>	Admin personnel		<p>Record of shuttle bus exemptions.</p> <p>Light vehicle use records and shuttle bus schedule</p>
AES 12	Accommodation, local procurement and local employment	Prioritise and select workers and subcontractors that can demonstrate a large proportion of workers live in the MWR LGA.	Ensure worker locality selection criterion with weighting scores is included in the recruitment and procurement processes to prioritise local workers/subcontractors and goods.	EPC Contractor, Operational personnel	Throughout construction and the operational phase	Maintain a report on workers and subcontractors and include proportion of jobs filled by locals of MWR LGA and proportion of subcontractors appointed with businesses located in MWR LGA to be provided in quarterly reports: recipients to include officials from ACEN, PCL and MWRC
AES 13	Accommodation	Establish and maintain a register of local property owners who have expressed interest in offering	Establish a register of property owners with rooms or houses/dwellings to rent and maintain records of number of rooms and rates of rental costs.	EPC Contractor, Operational personnel	Monthly review of local property availability during Stubbo Solar	Rental Property Owner register

ID	Matter	Mitigation measure	Action	Responsible party	When	Compliance record
		dwellings or rooms for rent.			construction phase.	
AES 14	Health services	Reduce the risk of increased demand on local health services posed by construction workers.	<ol style="list-style-type: none"> 1. Include discussion during the recruitment process outlining the strain on local health services and the preference for employees to service medical needs through their home medical providers (e.g., via telehealth and online prescription services). 2. Include health services module in the induction process describing methods to reduce the risk of overwhelming local medical service and facilities. 3. Inclusion of a fully equipped and stocked first aid room at the construction site, including a defibrillator. 4. Provision of trained first aiders on site. 5. Provision of local health care services list to workers. 	EPC Contractor - Health, Safety and Environment (HSE) Coordinator	Throughout construction	Induction records First aid room stock level records Defibrillator check and maintenance records First aider training records Health care services list
AES 15	Employment Strategy	Draft AES in accordance with Development consent conditions.	Draft AES in consultation with MWRC and DPE.	Principal (ACEN) and EPC contractor	Prior to construction	This AES and evidence of consultation with MWRC and DPE

ID	Matter	Mitigation measure	Action	Responsible party	When	Compliance record
AES 16	Employment Strategy	Implement approved AES and relevant updates throughout project.	Monitor, document and maintain recruitment records. Assess against employment targets.	Principal, EPC Contractor, Construction Personnel	Prior to construction	Personnel contracts Personnel induction records Records of employment assessment against relevant targets
AES 17	Local Employment	Maximise visibility of job opportunities.	Maximise employment and retention of local workers by: <ul style="list-style-type: none"> engaging local labour hire companies with a strong local presence and connection with local residents engaging with Mudgee Aboriginal Land Council and other local Indigenous organisations (e.g., Three Rivers Regional Assembly - https://trra.community/) to confirm key employment agencies / labour hire companies. engaging with the specialist Indigenous employment agencies to understand the size of the potential Aboriginal and Torres Strait Islander labour pool and to identify strategies to secure participation. 	Principal and EPC contractor	Prior to and during construction	Communication records (emails, letters, records of phone calls) Employment, contracting and procurement session attendance registration Employment contracts indicating origin of employee (i.e., local or non-local)

ID	Matter	Mitigation measure	Action	Responsible party	When	Compliance record
AES 18	Local employment and skills development	Maximise local worker component of the site workforce.	<p>Targeted local recruitment campaigns.</p> <p>Initiatives to facilitate the transition from training to long term employment for participants.</p> <p>Funding for micro-credentialling programs that offer short-course training outcomes to meet regional skills shortages and provide pathways to longer term employment.</p> <p>Identify project positions where additional investment in training may result in increased local participation and engage with local training providers /businesses to encourage these organisations to supply the necessary training locally.</p> <p>Job readiness program with local employment agencies to identify suitable candidates and receive applications for advertised roles.</p>	Principal and EPC contractor	Prior to and during construction	<p>Recruitment campaign records</p> <p>Project employment records</p> <p>Funding records</p> <p>Program records, meeting records</p>
AES 19	Local employment and skills development	Take action to address skill shortages in the area by targeting local schools.	<p>Work experience programs for secondary education students.</p> <p>Funding for secondary level education scholarships and other</p>	Principal and EPC contractor	Prior to, during construction and in	<p>Work experience HR records</p> <p>Funding and project documentation</p>

ID	Matter	Mitigation measure	Action	Responsible party	When	Compliance record
			<p>education and employment pathways programs.</p> <p>Participation in industry forums and events aimed at generating interest for secondary students to pursue a career in renewable energy.</p>		operational phase	Event registration and attendance records
AES 20	Local employment	Establish relationship with Mudgee TAFE to provide workforce training as required.	Establish ongoing dialogue with Mudgee TAFE regarding training opportunities to discuss skills gaps and to promote local employment and participation in the renewables industry.	EPC contractor	Throughout construction and the operational phase	Meeting records
AES 21	Local procurement	Ensure local suppliers and workforce have visibility over opportunities.	<p>Hosting of supplier forums to provide information about upcoming tenders.</p> <p>Establish and maintain online registration portal for local businesses to register their interest.</p>	Principal, EPC Contractor,	Prior to and during construction	<p>Forum records</p> <p>Online register records</p>
AES 22	Local procurement	Timely and meaningful supplier feedback.	Provisions to provide meaningful feedback to local businesses who submit unsuccessful tenders providing information and opportunity for development of capability and long-term participation.	Principal, EPC Contractor	Prior to and during construction	Procurement records

ID	Matter	Mitigation measure	Action	Responsible party	When	Compliance record
AES 23	Local procurement	Include selection criteria for sub-contractor selection process to prioritise the employment of at least 10% local contractors from the MWR LGA and beyond.	<p>Establish and implement contractor relevant selection criteria and weighting to prioritise locally sourced contractors and businesses.</p> <p>Review workforce requirements and sub-contractor requirements against forecast needs and AES targets every month.</p>	Principal and EPC contractor	Prior to and during construction	<p>Maintain monthly register of employees and sub-contractors to report on:</p> <ol style="list-style-type: none"> 1) proportion of jobs filled by residents of MWR LGA and Dubbo and Orana Region 2) proportion of sub-contractors appointed with businesses registered in the MWR LGA and Dubbo and Orana Region 3) proportion of subcontractors demonstrating Indigenous ownership or employment 4) proportion of jobs filled by underrepresented groups 5) proportion of jobs filled by Aboriginal people and/or Torres Strait Islanders 6) proportion of contract value applied to the cost of education, training or capacity building for Aboriginal staff or businesses directly contributing to the contract

ID	Matter	Mitigation measure	Action	Responsible party	When	Compliance record
						7) proportion of jobs filled by apprentices
AES 24	Local procurement	Promote local business capability development.	Engage and partner with government e.g., MWRC, Aboriginal employment services, local organisations and other community groups e.g., Birrang Enterprise Development Company, Mudgee Local Aboriginal Council, VERTCO, OTEC Mudgee Employment Service, to support regional modelling of business and workforce needs and communicate pending Project employment and procurement opportunities. Review workforce requirements and sub-contractor requirements against forecast needs and AES targets every month.	Principal and EPC contractor	Prior to and during construction	Project procurement records Workforce modelling documents MWRC preferred contractors list Documentation of engagement with local organisations and involvement in events or online communication about local employment and procurement opportunities
AES 25	Local procurement	Establish and maintain an EOI register for local goods and services providers, and individuals seeking employment with the project. Liaise with MWRC	Advertise and market widely to ensure local suppliers are aware of opportunities. Establish online Expression of Interest (EOI) register before development commencement. Maintain and review responses throughout construction. Include proportion of EOIs resulting in local	EPC Contractor, Operational personnel	Throughout construction and the operational phase	ICN Gateway webpage Information days held in Gulgong together with attendance records Stubbo Solar EOI web page Local newspaper articles and notices

ID	Matter	Mitigation measure	Action	Responsible party	When	Compliance record
		regarding the preferred contractors list.	employment opportunities in monthly report.			<p>Records of engagement with local business organisations (e.g., Mudgee Region Business and Gulgong Chamber of Commerce)</p> <p>Project procurement records indicating whether the goods and services are provided by local businesses (target is at least 10%)</p> <p>Records of assessment regarding 1.5% of the contract value being subcontracted to Aboriginal-owned businesses</p>
AES 26	Code of Conduct	Legal right to work and Temporary Visa workers.	Work with engaged subcontractors to ensure all workers are legally entitled to work in Australia and ensure any Temporary Visa workers have their basic rights upheld.	EPC Contractor	Construction and operational phase	<p>Employment contracts</p> <p>Induction records</p> <p>Visa records</p>

Strategies to minimise other impacts

Healthcare

MWRC provides health and wellbeing support to the community, including providing services in aged and disability care, and offering key medical and business facilities, and sporting and recreation facilities. It is considered that the additional demand for health care due to the workforce could negatively impact the current services available. Mitigation measures include:

- The workforce induction process will include a thorough briefing via lecture and visual aids regarding the issue of limited local medical and health facilities.
- Promote the use of telehealth services with workers' designated General Practitioners (GPs) and support worker access to mental health support services
- Promote the use of online prescription services (e.g., InstantScripts and Doctors On Demand) or phone apps (e.g., DoctorAI)

On-site mitigation measures will include:

- Possible temporary employment of a fully qualified medical professional some of the construction phase of the project.
- Inclusion of a fully equipped and stocked first aid room at the construction site, including a defibrillator.
- Trained first aiders to manage any minor medical issues on site

The public hospital system will be used to ensure compliance with the Work Health and Safety Act on occasions when a worker requires a higher level of medical assistance

MWR LGA events

The MWRC hosts various annual events and activities with many of these centred on the Mudgee region. PCL and Transgrid will consult with MWRC and local businesses regularly to understand and limit the impact of the Stubbo Solar project on these activities. Events in the DR and WS LGAs are also considered.

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Abbreviations

%	percent
ABS	Australian Bureau of Statistics
AC	alternating current
Accent	Accent Environmental Pty Ltd
ACEN	ACEN Australia Pty Ltd
AES	Accommodation and Engagement Strategy
API	application programming interface
BCD	Biodiversity Conservation Division
BESS	battery energy storage system
BoP	balance of plant
CEMP	Construction Environmental Management Plan
CoC	condition of consent
CWOREZ	Central West Orana Renewable Energy Zone
DAFF	Department of Agriculture, Fisheries and Forestry
DC	development consent
DCCEEW	Department of Climate Change, Energy, the Environment and Water
DPE	Department of Planning and Environment
DRC	Dubbo Regional Council
EIS	environmental impact statement
EMP	environmental management plan
EMS	environment management strategy
EOI	expression of interest
EPC	engineering, procurement, and construction
FER	Functional economic region
FTE	full-time equivalent
GDP	Gross Domestic Product
GIS	Geographical information system
Glencore	Glencore Coal Assets Australia Pty Ltd
GP	General Practitioner
GPS	Generator Performance Standards
GRP	Gross Regional Product
GSP	Gross State Product
ha	hectare

HSE	health, safety and environment
HV	high voltage
ICN	Industry Capability Network
ID	identification
IRSD	Index of Relative Socioeconomic Disadvantage
IPC	Independent Planning Commission
km	kilometre
kV	kilovolt
LGA	local government area
LTESA	Long-Term Energy Service Agreement
MW	megawatt
MWRC	Mid-Western Regional Council
NSW	New South Wales
NSW RFS	NSW Rural Fire Service
OEMP	Operations Environment Management Plan
pa	per annum
PCL	Pacific Rim Construction Pty Ltd
PCU	power conversion unit
PV	photovoltaic
QGIS	Quantum GIS (open-source GIS platform)
Ramboll	Ramboll Australia Pty Ltd
RAP	registered aboriginal party
RDA	regional development area
REZ	Renewable Energy Zone
RtS	response to submissions
SA	Statistical area
SEARs	Secretary's Environmental Assessment Requirements
SEIFA	Socio-Economic Indexes for Areas
SF	solar farm
SME	Small to medium enterprise
SSD	State significant development
SSI	State Significant Infrastructure
STRA	Short-Term Rental Accommodation
Stubbo Solar	Stubbo Solar project
TAFE	Technical and Further Education

TfNSW	Transport for NSW
TMP	traffic management plan
WF	wind farm
WHS Act	<i>Work Health and Safety Act 2011</i>
WSC	Warrumbungle Shire Council

1 Introduction

The Stubbo Solar project (the Project) is a 400 megawatt (MW) alternating current development with an allowance for future battery storage of up to 200 MW/2 hour. The project is located between Blue Springs Road and Barneys Reef Road, approximately 10 km North of Gulgong and 85 km east of Dubbo in New South Wales (NSW).

ACEN Australia (ACEN), formerly UPC Renewables Australia Pty Ltd, is the project applicant and owner, and has engaged Pacific Rim Construction Pty Ltd (PCL) as the engineering, procurement and construction (EPC) contractor to manage the works for the solar farm, switchyard, ancillary operational facilities and earthworks bench for the future battery storage.

ACEN has also engaged Transgrid to connect the Project to the transmission network used by Transgrid to provide transmission services, which includes certain works that need to be completed by Transgrid to enable Transgrid to connect the Project to the transmission network.

On 29 June 2021, the Executive Director, Energy, Resources and Industry Assessments granted consent to the development application for the Stubbo Solar Farm subject to conditions, under delegation from the Minister for Planning and Public Spaces and section 4.38 of the Environmental Planning and Assessment Act 1979 (the Act).

In a letter dated 24 August 2022, the Secretary approved the Applicant's proposal to develop the project in two stages, comprising:

Stage 1: Road upgrades including construction of the main site access; and

Stage 2: Construction of the solar farm.

In a subsequent letter dated 10 May 2023, the Secretary approved the Applicant's request dated 8 May 2023 seeking the Planning Secretary's approval to revise the staging of the Stubbo Solar Project under Condition 3 of Schedule 4 of SSD-10452, and to develop the project in four stages comprising:

- Stage 1: Road upgrades (Blue Springs Road) and construction of the main site access.
- Stage 2: Solar project construction and operation including:
 - Stage 2a: Construction and commissioning of the solar facilities including solar array, substation and all ancillary infrastructure, including the switchyard and transmission line connection to be constructed by Transgrid.
 - Stage 2b: Operation of the Stubbo Solar Project.
- Stage 3: Construction, commissioning and operation of the Battery Energy Storage System (BESS), including substation and switchyard expansion (within the development footprint).
- Stage 4: Decommissioning of the Stubbo Solar Project at end of life.

This AES is for Stage 2a of Stubbo Solar, as approved by the Secretary in the letter dated 10 May 2023.

As outlined in the Development Consent (DC) – Application Number: SSD-10452 the preparation, approval and implementation of an accommodation and employment strategy (AES) is required along with other management plans for both the construction and operations phases of the project. Commitments were also made by ACEN in the environmental impact statement (EIS), the response to submissions (RtS) report and the EIS Amendment report for inclusion in the management plans.

The study area for this AES is shown in Figure 1.1. The primary region of investigation is the Mid-Western Regional Council (MWRC) local government area (LGA), in which the project is located. Due to their proximity to the project, the Dubbo Regional Council (DRC) and Warrumbungle Shire Council (WSC) LGAs have also been considered in the AES. However, as it is likely Stubbo Solar non-local construction workers will be accommodated entirely within the MWR LGA boundary, consultation with Dubbo Regional and Warrumbungle Shire Councils regarding workforce accommodation is considered unnecessary at this point. Figure 1.2 shows the general locality for the Stubbo Solar project.

ACEN is the Proponent and ultimately takes responsibility for compliance with SSD-10452. This responsibility is reflected in the management plans, programs and strategies developed for the project.

As both PCL and TransGrid have been contracted by ACEN to undertake construction of the Stubbo Solar Project, the PCL and Transgrid adopted environmental and related policies/standards will comply with, and where possible exceed, the minimum standards set by ACEN in the Accommodation and Employment Strategy (AES).

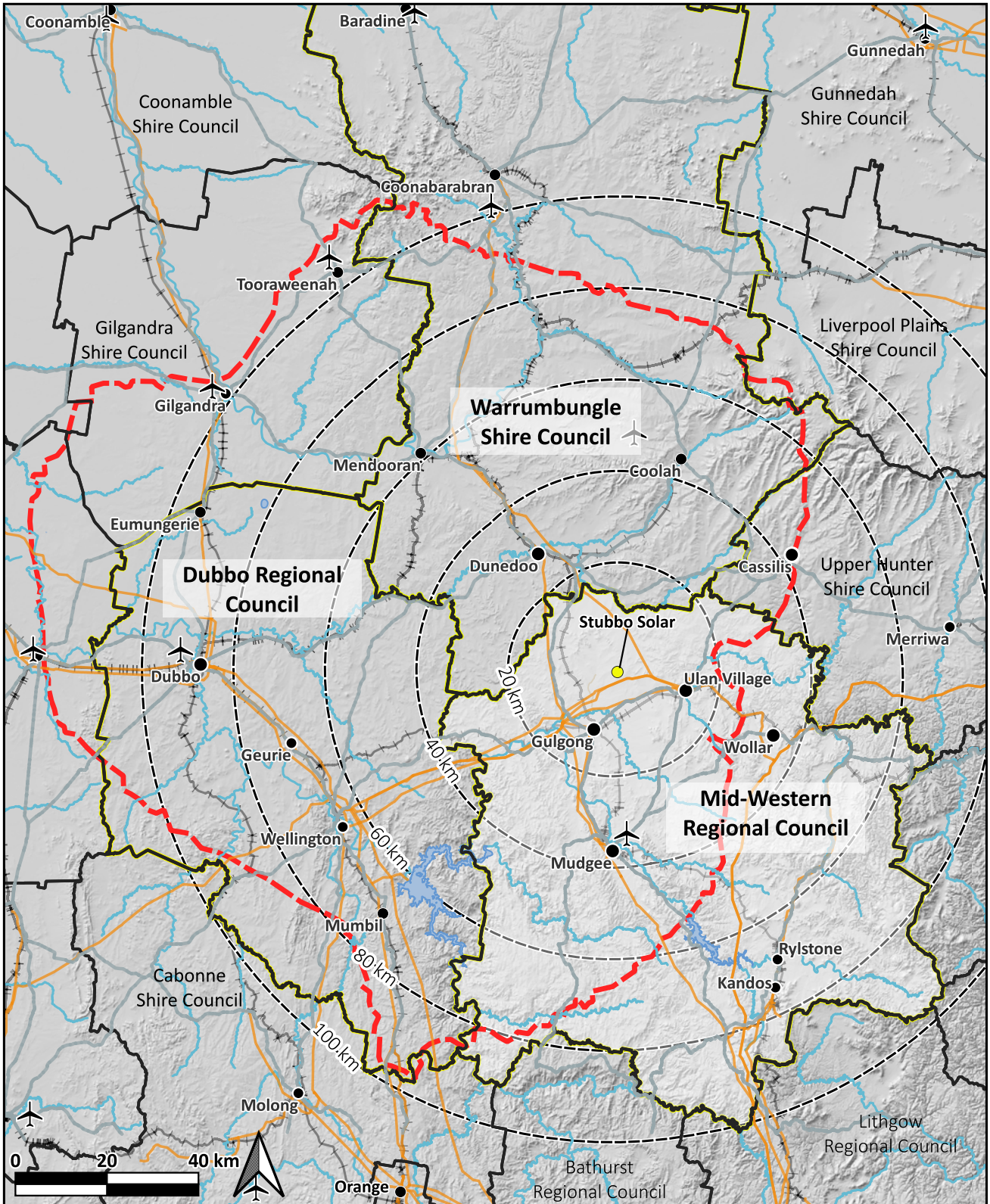
PCL has engaged Accent Environmental Pty Ltd (Accent) to prepare this AES for Stage 2a of the Stubbo Solar project.

1.1 Purpose and scope of this document

The purpose of this AES is to provide an overarching plan to enable ACEN, PCL and Transgrid to meet their management obligations in relation to social impacts and opportunities specifically regarding accommodation and employment.

This AES is an environmental management subplan that comes under the project Environmental Management Strategy (EMS) and Construction Environment Management Plan (CEMP). The AES has been established to manage employment and accommodation requirements for Stage 2 construction and/or operation of the project. Figure 1.3 shows where this AES sits in relation to the EMS and other management plans.

The AES covers the Stage 2a construction works to be undertaken by PCL and Transgrid as described in Section 3.1. Stage 1 works have been completed prior to the commencement of Stage 2a construction works and was completed by a small workforce. This AES was prepared in consultation with MWRC and DPE as outlined in Section 1.7 and Section 1.9 below. Its principal regional focus is the MWR LGA (see Figure 1.1) as this is where Stubbo Solar is located and where some of the labour force and short- to long-term accommodation will be sourced.



- Stubbo Solar
- City/town
- ✈ Airport
- Existing transmission line
- Road
- +— Railway
- Main watercourse
- ▭ Regional study area (Mid-Western Regional Council)

- ▭ Secondary study area (Dubbo Regional and Warrumbungle Shire Councils)
- ▭ Other LGA boundary
- ▭ Central-West Orana REZ
- ▭ Waterbody
- ▭ Radius (20 km increments from Stubbo Solar)

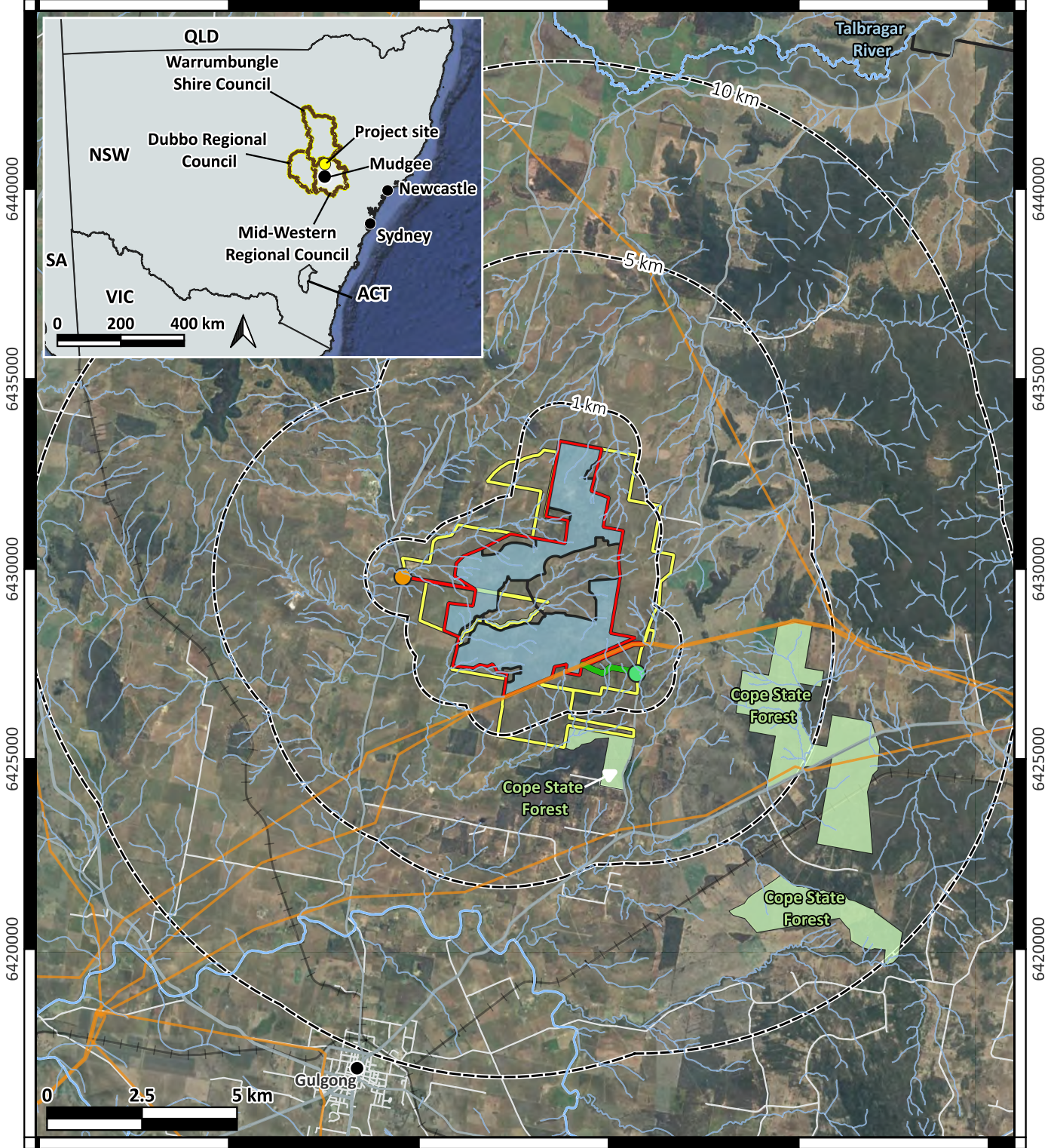
Accent 1129 Stubbo Solar project
Figure 1.1. Regional context and AES study area

Created 4/04/2023
 CRS: GDA 20 MGA 55
 Scale: 1:1,250,000 at A4
 Page size: A4

Base map: NSW_5m_DEM_Hillshade.2x.3857.ovr [Mar 2023]
 Additional data: NSW RoadSegment, NSW Hydroline, NSW_Six_Mid_Western_Cadastral_data, NSW ElectricityTransmissionLine, Central Orana REZ sourced from PDF downloaded from EnergyCo's website (April 2023)



730000 735000 740000 745000 750000 755000



730000 735000 740000 745000 750000 755000

- Site access point
- Emergency access point
- Access road, project Stage 1
- Existing transmission line
- Road
- Main watercourse
- Watercourse - tributary
- Proposed access corridor
- Project site
- Project lot boundary
- Solar array extent
- State Forest
- Radius (1, 5, and 10 km) from Stubbo Solar

Accent 1129 Stubbo Solar project
Figure 1.2. Site locality
 Created 26/06/2023
 CRS: GDA 20 MGA 55
 Scale: 1:150,000 at A4
 Page size: A4

Base map: Google Satellite [Apr 2023]
 Additional data: NSW RoadSegment, NSW Hydroline, NSW_Six_Mid_Western_Cadastral_data, NSW ElectricityTransmissionLine



Short-term accommodation in the Dubbo Regional LGA (DR LGA) and Warrumbungle Shire LGA (WS LGA) would only be considered if there is a shortfall in accommodation proffered within the Mid-Western Regional LGA (MWR LGA).

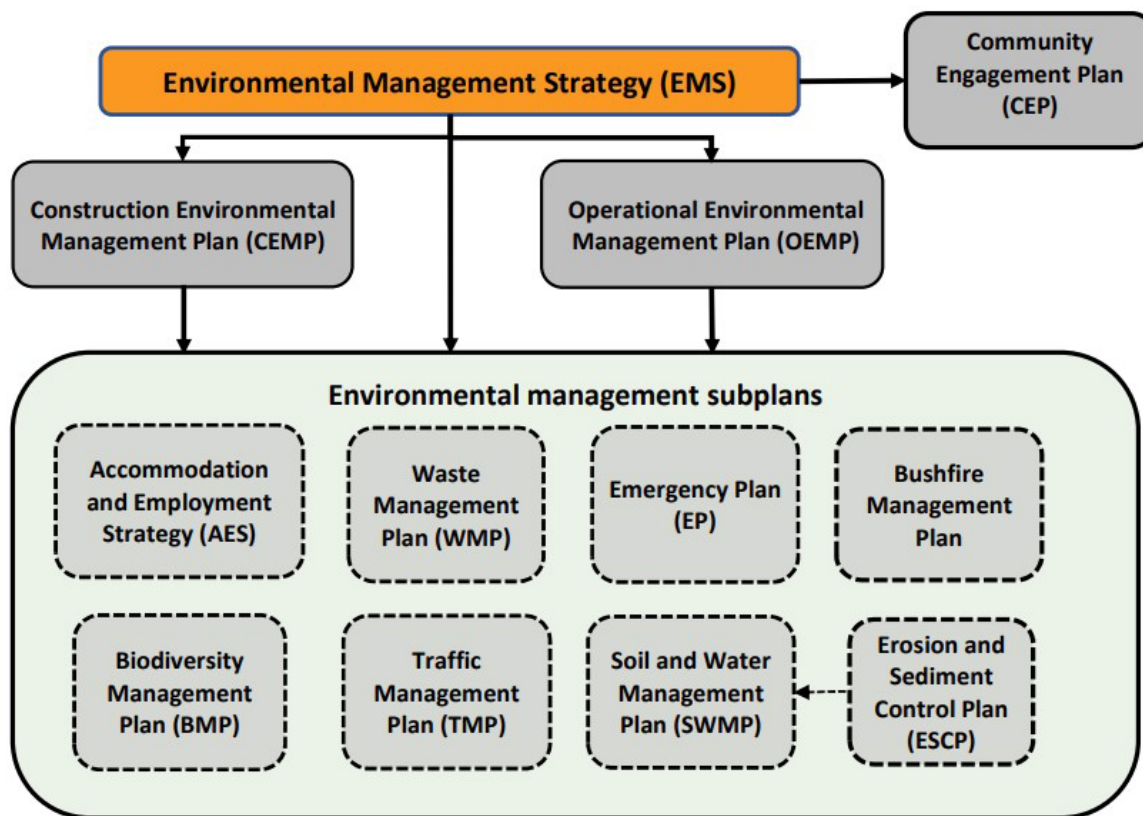


Figure 1.3 Schematic of environmental management documentation

1.2 Project overview

The Stubbo Solar project will generate energy through the conversion of solar radiation to electricity via photovoltaic (PV) modules (solar panels). The solar panels will generate direct current electricity that will be inverted to AC electricity via the use of power conversion units. The electricity output from the project will then be supplied to an existing 330 kilovolt (kV) transmission line (Line 79) operated by Transgrid.

1.3 Project objectives

ACEN has established a number of objectives for the project which take into account factors such as contribution to community, the environment and safety. These objectives include the following of particular relevance to the CEMP and the environmental management plans that sit below it, including the AES:

- zero injuries or environmental harm during construction and operation of the works

- design for the safety of people, livestock, fauna and flora, and the environment throughout the life of the solar farm in accordance with good industry practices
- mutually beneficial relationships with host communities, First Nations and other stakeholders are in place throughout the life of the project
- host communities and First Nations peoples are provided with opportunities to actively participate in and benefit from the project through employment, training, social procurement and investment
- minimise adverse social and environmental impacts on the local community and environment
- allow for future grazing, by sheep, within the solar farm (post construction phase)
- contribute to Australia's transition to a clean energy future.

In accordance with CoC 1 (Schedule 2) of the DC, in meeting the specific environmental performance criteria established under the DC, PCL and Transgrid will implement all reasonable and feasible measures to prevent and/or minimise any material harm to the environment that may result from the construction, operation, upgrading or decommissioning of the development (as relevant).

1.4 Accommodation and employment objectives

Stubbo Solar can both impact and benefit regional communities, and ACEN seeks to develop solutions that encourage social participation so that the benefits are shared.

For accommodation, ACEN seeks to develop a strategy that will:

- have a limited impact on the local way of life
- not adversely impact on regional housing affordability and availability
- not adversely impact the region's reputation as a tourist destination
- not adversely impact on availability of regional social and crisis accommodation.

For employment, ACEN seeks to develop a strategy that will:

- embed selection criteria and weightings into recruitment and employment processes to prioritise local employment at or above 10%
- provide workforce participation opportunities for regional people through employment and training streams, supporting the development of a skilled local workforce with sustainable career paths
- prioritise the procurement of goods and services from regional businesses.

To achieve these objectives, the following activities have been undertaken:

- investigation of both short- and long-term accommodation options in the area
- investigation of options for prioritising the employment of local workers for the construction and operation of the development

- consideration of the cumulative accommodation and workforce impacts associated with other State Significant Development (SSD) projects in the area
- preparation of a program to monitor and review the effectiveness of the strategy over the life of the development, including regular monitoring and review during construction.

This AES is part of PCL and Transgrid’s environmental management framework for the project and is supported by other documents such as work procedures. The review and update process for this AES is described Section 12.

1.5 Structure of the AES

This AES is structured as follows:

- Section 1 – Introduction
- Section 2 – Statutory requirements and other commitments
- Section 3 – Project description
- Section 4 – Regional profile
- Section 5 – Workforce estimates
- Section 6 – Cumulative impacts
- Section 7 – Accommodation strategy
- Section 8 – Employment strategy
- Section 9 – Workforce transport impacts
- Section 10 – Workforce code of conduct
- Section 11 – Strategies
- Section 12 – Monitoring and review
- Section 13 – Strategy availability

1.6 Distribution of this AES

The AES was prepared in consultation with MWRC and other relevant stakeholders and submitted to the Department of Planning and Environment (DPE). The AES will be made available to ACEN, PCL, Transgrid and subcontractors. As required by The CoC (Schedule 4 Section 17(a)), paper and electronic copies will be available in the ACEN site office, and web versions of the documents will be available on the Department’s Major Project website and the project’s website.

1.7 Consultation with MWRC

A draft of the AES was provided to MWRC for their consideration on 19 May 2023. On 6 June 2023 MWRC responded to the draft AES with a letter endorsing the AES. The letter stated:

“Council is pleased to offer its support and approval of the Accommodation and Employment Strategy. It is important to note that our endorsement is with the expectation that ACEN Australia diligently adheres to the strategy in all aspects.”

Should any modifications or adjustments be required to the strategy in the future, Council requests ACEN Australia to communicate with Council promptly.”

MWRC noted the following:

- Stubbo Solar workers reserve accommodation up to six weeks before it is required
- at the time of issuing the letter the accommodation at Frog Rock private accommodation is permitted for up to 7 individuals
- quarterly review meetings will be held between ACEN Australia and MWRC to review the AES.

The MWRC letter of endorsement is attached as Appendix A.

1.8 Consultation summary

The CoC (Schedule 3, Condition 33) requires that this AES be developed in consultation with the MWRC. Engagement with the MWRC and other key stakeholders is necessary to ensure that opportunities to maximise accommodation use and employment opportunities within the regional community are realised and to minimise disruption caused by and conflict with other projects, as required by the CoC and by Commitment SIA1 (see Section 2, Table 2.2).

Various consultations have taken place since 2020 on matters related to accommodation and employment with MWR LGA, accommodation providers, other key stakeholders and the general community. A summary of prior consultation activities of relevance to this AES is shown in Table 1.1.

Table 1.1 General consultation in relation to accommodation and employment

Stakeholder	Engagement	Date of engagement
MWRC – including: Brad Cam, General Manager Elena Azar, Director Development Lisa Penson, Economic Development Coordinator	Meeting to provide input into the workforce and accommodation strategy for the project.	11 November 2020
	Meeting to provide input on criteria used to assess potential worker camp sites, discuss land that could be considered as part of the assessment, and identify projects ACEN could invest in to benefit the community.	16 January 2023
	Meeting with Accent to discuss AES matters	8 March 2023
	Meeting and subsequent correspondence with ACEN to further refine MWRC’s expectations regarding non-local worker accommodation	14 March 2023
	Meeting with ACEN to review the amended AES	20 April 2023
	Provision of comments on draft AES	5 June 2023
	Further liaison as required to further refine accommodation other project-related matters	As needed

Stakeholder	Engagement	Date of engagement
Local Community	Employment, contracting and procurement session at the Gulgong Memorial Hall	20 April 2023
	Meeting at Gulgong RSL (43 attendees): concerns on visual change, construction, traffic noise, workforce and accommodation management.	29 August 2018
Local accommodation providers	Initial consultation with providers following Development Approval	2021
	Investigations regarding accommodation availability; email exchanges and telephone discussions	January and February 2023
	<p>Employment Information Day Gulgong – 100 attendees</p> <p>Expressions of interest to provide up to 228 rooms for non-local workforce accommodation were received from:</p> <ul style="list-style-type: none"> • local estate agents – potential leasing of up to 60 houses to the proponent: assuming 3 bedrooms per house, up to 180 rooms potentially available • private accommodation (30-minute drive from the project site) has 20 units and a 4-bedroom house available with semi-commercial kitchen available for lease • up to 31 homeowners have indicated their willingness to sublet one or more rooms in their homes to accommodate non-local workers • more local landlords and residents may be interested in providing accommodation 	20 April 2023
	Employment Information Day in Gulgong	26 July 2023
DPE	Request for additional information regarding the AES and Response Table (refer to Appendix G for these documents)	21 June 2023

Various consultations have taken place with MWRC to date since the inception of the Stubbo Solar Project. Below is a summary of the key insights in relation to accommodation and employment as an outcome of this engagement (Table 1.2).

1.9 Adaptive management plan

ACEN has several projects in the Central West Orana Renewable Energy Zone (CWOREZ) in addition to Stubbo Solar and, importantly, has been engaging with MWRC on the accommodation and employment impacts and benefits associated with these projects. Initial

forecasts of ACEN’s collective workforce requirements in the CWOREZ over the next four years is estimated to exceed 1,000 non-local workers at peak.

Table 1.2 Key insights from MWRC consultation

Topic	Key insights
Worker accommodation	<ul style="list-style-type: none"> ● Avoid using tourist accommodation. Tourism is a key industry for the region’s long-term economic prosperity. ● Prefer workers to be accommodated away from town because influx of workers may disrupt local lifestyle and towns have not realised economic benefits in the past. ● Worker accommodation camps must provide long-term legacy outcomes. ● Assume that less than 10% of the construction workforce will be sourced locally due to increased demand from other projects and limited supply of skilled workers. ● Account for demand on local infrastructure (roads, water, electricity, waste) even if workers are located away from towns in temporary worker camps.
Employment	<ul style="list-style-type: none"> ● Assist local businesses in diversifying to get into the supply chain for current and future energy projects. ● Provide traineeship and apprenticeship schemes to provide opportunities for young people in the area.

MWRC has indicated they wish to support the speedy commencement of construction of Stubbo Solar to reduce the likely overlap and cumulative impacts associated with other large-scale renewable energy developments in the region. As the timing of construction of the CWOREZ projects is uncertain and the Stubbo Solar project is expected to precede them, an adaptive management plan is required in relation to accommodation needs and employment impacts. While MWRC has advised ACEN that its preference is for ACEN to avoid using tourist accommodation and accommodate workers away from town, availability of worker accommodation camp infrastructure is limited and unlikely to become available in time to service the immediate construction workforce required for Stubbo Solar.

As such, ACEN is engaging with MWRC and other stakeholders on a regional work camp accommodation solution to service ACEN’s broader CWOREZ projects. This includes a commitment from ACEN to invest in legacy solutions that focus on improving the liveability and sustainability of regional townships. While the timing for a work camp solution may not align with the immediate worker accommodation needs for Stubbo Solar, there is potential that the benefits of a regional ACEN worker accommodation solution could be realised for Stubbo Solar from 2024 onwards. As such, the primary workforce accommodation strategy proposed for Stubbo Solar is centred on the use of existing short- and long-term accommodation within the region.

This strategy is supported through the following commitments:

- a maximum of 44% of the non-local workforce may be accommodated in short- and long-term accommodation in MWR LGA

- short- and long-term accommodation providers in the Dubbo region would be utilised as a last resort should proffered accommodation within the MWR LGA boundary not meet Stubbo Solar non-local workforce needs
- minimum 12-month leases will be executed with long term accommodation providers to accommodate full time Stubbo Solar workers, and also for use as shared accommodation for short term specialised non-local contractors
- the scheduling of peak construction activities during significant regional tourism events will be avoided
- shuttle buses will be provided where possible to minimise traffic congestion during shift start and end times; refer to the traffic management plan (TMP) for further details regarding shuttle bus services
- selection criteria and weightings will be embedded into recruitment and employment processes to prioritise local employment at or above 10%.

2 Statutory requirements and other commitments

2.1 Conditions of consent

The DC contains several CoCs relevant to accommodation and employment strategy during construction and operation, as listed in Table 2.1.

Table 2.1 Development Consent Conditions relevant to this AES

No.	Condition	Reference
Schedule 3 - Environmental Conditions – General		
33	<i>Prior to commencing construction, the Applicant must prepare an AES for the development in consultation with Council, and to the satisfaction of the Secretary. This strategy must:</i>	This document
33a	<ul style="list-style-type: none"> <i>propose measures to ensure there is sufficient accommodation for the workforce associated with the development;</i> 	Section 7
33b	<ul style="list-style-type: none"> <i>consider the cumulative impacts associated with other State significant development projects in the area and tourism activity;</i> 	Section 6
33c	<ul style="list-style-type: none"> <i>investigate options for prioritising the employment of local workers for the construction and operation of the development, where feasible; and</i> 	Sections 8 and 11.2
33d	<ul style="list-style-type: none"> <i>include a program to monitor and review the effectiveness of the strategy over the life of the development, including regular monitoring and review during construction.</i> 	Section 12
<i>Following the Planning Secretary's approval, the Applicant must implement the AES.</i>		

2.2 Commitments in EIS and associated documentation

The EIS was prepared by Ramboll Australia Pty Ltd (Ramboll) and the commitments in the EIS (Ramboll, 2020) include the relevant management and mitigation measures set out in Table 20-1 of the main EIS report, Section 7 of the Amendment Report (Ramboll, 2021a) and the RtS report (Ramboll, 2021b).

The commitments in the EIS and the RtS report relevant to the preparation of the AES are listed in Table 2.2. There were no relevant commitments in the Amendment report.

Table 2.2 Relevant commitments in the EIS and Response to Submissions report

No.	Condition	Reference
EIS and Response to Submissions report		
SIA1	<i>An Accommodation and Employment Strategy will be developed and implemented for the project in consultation with Mid-Western Regional Council. This strategy will:</i>	This AES
	<ul style="list-style-type: none"> consider various workforce scenarios assuming the construction period overlaps with other major projects and considering peak tourism activity 	This AES
	<ul style="list-style-type: none"> propose measures to manage workforce accommodation to minimise the effects of non-local hires during construction on short-term accommodation availability and the local housing market 	This AES
	<ul style="list-style-type: none"> include a code of conduct for the projects workforce, particularly to avoid anti-social behaviour at peak construction and align with Mid-Western Regional Council's existing industry agreements 	Section 10
	<ul style="list-style-type: none"> to the extent possible and within ACEN's control, consider the cumulative impacts associated with other State significant development projects in the area, including nearby mines 	Section 6
	<ul style="list-style-type: none"> investigate options for prioritising the employment of local workers for the construction and operation of the project, where feasible and appropriate given the required skills and experience 	Section 8
	<ul style="list-style-type: none"> include a program to report measures undertaken or implemented in line with the strategy include a program to monitor and review the effectiveness of the strategy over the life of the project, including regular monitoring and review during construction 	Section 12
	<ul style="list-style-type: none"> include detailed information regarding the number of beds and types of accommodation to be utilised monthly for the period of construction. 	Section 7
<p><i>The strategy will be approved by Mid-Western Regional Council prior to commencement of construction.</i></p> <p>[For consistency with Schedule 3, Condition No. 33 of the Development Consent, the strategy has been prepared in consultation with MWRC]</p>	Appendix A – copy of MWRC's endorsement of the AES and Appendix G – copy of MWRC's acknowledgement	

No.	Condition	Reference
		of receipt of the AES
SIA2	<i>A community benefit share fund will be developed. Community projects needing funding will be identified and prioritised based on potential project impacts and in collaboration with representatives of the local community and Mid-Western Regional Council.</i>	Sections 4.5 and 8.5
SIA3	<i>Investigation will be undertaken into the value of investment in local tertiary training institutions to address skills shortages were identified during the development of the Accommodation and Employment Strategy. Where value is identified and a strategy is defined, investment will be targeted through the community benefit share fund.</i>	Sections 4.5 and 8.5
SIA4	<i>During development of the Accommodation and Employment Strategy, further consultation with local short-term accommodation providers will be undertaken to identify and where appropriate secure, accommodation for the non-local portion of the construction workforce.</i>	Appendix B
SIA5	<i>During development of the Accommodation and Employment Strategy, further consultation with local employment service providers will be undertaken to identify and where appropriate secure, local hires.</i>	Section 8

While preparing the EIS, ACEN made additional commitments to MWRC to address the issue of accommodation and employment including the following three step strategy:

- Step 1: Initial assessment for the purpose of the EIS (Social Impact Assessment) – this will include meetings with local stakeholders in the first half of November 2020.
- Step 2: Post EIS-lodgement, on-going consultation with local stakeholders, registration of interest of contractors, coordination with the CWOREZ body for cumulative impacts, discussion regarding training with local Technical and Further Education (TAFE).
- Step 3: Once an EPC Contractor is selected, finalisation of the assessment and implementation of all actions identified in Step 1 & 2. This includes the preparation of an AES as required by the NSW Government and hosting employment fairs in local towns.

Although the requirement for a Social Impact Assessment was already in the Secretary’s Environmental Assessment Requirements (SEARs) for the project, ACEN decided that they should take the issue further than was required by the SEARs as:

- The issue of workforce availability and accommodation was raised by some members of the community during the community drop-in session held on 28th of October 2020.
- Council had indicated a willingness to address this issue in the context of the CWOREZ where cumulative impacts can be expected in the next years.

In 2021 and 2022, ACEN engaged EMM Consulting regarding project-related socioeconomic matters, associated risks and their possible mitigation or management. Matters included rental availability, rental vacancy rates, estimation of room numbers across accommodation types, labour market characteristics, regional events, other major projects in the area and risk assessments and mitigation (local employment and procurement, housing and accommodation, and community wellbeing/access to services).

2.3 Relevant planning documents

Relevant planning documents used to develop this AES are listed in Table 2.3.

The Mid-Western Region Towards 2040 Community Plan (Community Strategic Plan) is MWRC’s highest level strategic plan and sets out the community’s vision for the future. The Community Strategic Plan is supported by a four-year Delivery Program (the MWRC Delivery Program 2022/23-2025/26 and Operational Plan 2022/23 [Delivery and Operational Plan]) a Resourcing Strategy; an annual Operational Plan; and an end of term report on achievements (EMM 2022a).

The Delivery and Operational Plan details the principal activities MWRC will undertake to achieve the goals identified in the Community Strategic Plan and sets out the projects and activities to which MWRC is committed to in the current financial year (i.e., 2022-2023).

Table 2.3 Planning guidance and strategies

Authority	Document Name
Mid-Western Regional Council	Mid-Western Region Community Plan – Towards 2040 (MWRC 2022a)
	Regional Economic Development Strategy 2018-2022 (MWRC 2018b)
	Regional Development Strategy – 2023 Update (NSW Government 2023b)
	Our Place 2040 Mid-Western Local Strategic Planning Statement (MWRC 2020)
	Delivery Program 2022/23-2025/26
	Operational Plan 2022/23
	Development Control Plan 2013
	Local Environmental Plan 2012
NSW Government	Central West and Orana Regional Plan 2041
	A 20-Year Vision for Regional NSW (February 2021)
	Regional Housing Taskforce Findings Report (DPIE 2021a)
	Housing 2041: NSW Housing Strategy (DPIE 2021b)
EnergyCo	Central-West Orana Renewable Energy Zone – Coordinating community impacts and benefits in the REZ (March 2023)

Authority	Document Name
	Revised study corridor community feedback report Central-West Orana Renewable Energy Zone (June 2022)
	Central-West Orana Renewable Energy Zone January 2023 Project Update

3 Project description

Stubbo Solar is a 400-megawatt (MW) solar project with 200 MW/200 MW-hour (MWh) of battery storage located approximately 10 kilometres (km) north of Gulgong in the Central West and Orana (CWO) Region of NSW.

The project is classified as State Significant Development under the *Environmental Planning and Assessment Act 1979* (EP&A Act).

The project will generate enough renewable energy to power 185,000 average Australian homes per year and contribute to Australia's domestic and international commitments of renewable energy development, including NSW's target of 50% renewable energy by 2030.

Stubbo Solar will be developed across a 1,250-hectare site of cleared grazing land and will include rows of solar panels, electrical infrastructure such as inverters, a substation, cables and the battery system, access roads and other association infrastructure such as storage and maintenance facilities.

The project was granted development consent in June 2021.

3.1 Project Works

3.1.1 Stage 2a works

Key activities for Stage 2a include:

- site compound
- fencing works, including security fencing
- access roads including drainage and rehabilitation
- solar arrays that include:
 - general site wide cut to fill earthworks
 - piling installation
 - tracker installation
 - above ground and below ground cable installation and termination
 - module installation
- substation, switchyard and control buildings works that includes:
 - earthworks
 - structures and footings
 - gantries and HV switchgear
 - transformer installation and connection (Substation only)
 - control building installations (both Substation and Switchyard)
- operations & maintenance building, including warehouse facility
- cold commissioning works

- hot commissioning works including hold point testing for compliance to AEMO requirements
- site wide rehabilitation
- all other associated infrastructure.

3.1.2 PCL works

The works to be managed by PCL will convert energy from solar radiation into electrical energy to be fed into the electricity grid. A series of PV Modules mounted on a horizontal single-axis tracking (Tracker) structure will convert solar radiation into direct current electrical energy which will be fed into power conversion units (PCUs). Using inverters and step-up transformers, the PCUs will convert the direct current electrical energy into alternating current electrical energy at an optimised reticulation voltage, envisaged by ACEN to be a Medium Voltage such as 33 kV.

The high voltage (HV) works will step up the voltage to 330 kV and connect the Solar project to the Connection Assets (see Section 3.1.3, below).

PCL's design and all activities (on Site or otherwise) will be undertaken in such a manner as to not hinder, cause conflict, or create additional work for the future development.

External road upgrade works were required in support of the project. These External Road Upgrades comprised an upgrade of the main site access road (Blue Springs Road) and construction of the main site access. The External Road Upgrades have been completed by others and are not the responsibility of PCL or Transgrid or covered in this plan.

PCL's works are to be designed to minimise the land required to achieve the rated electrical output as defined in the Development Consent.

3.1.3 Transgrid works

ACEN has engaged Transgrid to connect the Project to the transmission network.

3.2 Project schedule

The proposed construction schedule for Stage 2a is summarised in Table 3.1.

Construction will be undertaken in three overlapping sections:

- Section 1 comprises construction of the Connection Assets (substation) by Transgrid and a switchyard build by PCL.
- Section 2 comprises the construction of the first area of solar arrays by PCL (southern area)
- Section 3 comprises the construction of the second area of solar arrays by PCL (northern area).

Construction will be followed by validation testing and a project closeout period.

Table 3.1 Stage 2a construction schedule

Activity	Start	Finish
Section 1		
Switchyard Construction (Transgrid) – Notice to Proceed	21-Oct-22	21-Oct-22
Substation Construction – Civil and Electrical Works	24-May-23	7-May-24
Section 2 (Generating System #1)		
Material Procurement	22-Dec-22	26-Feb-24
Civil Works	15-May-23	27-Sep-24
Solar Array Construction	4-Jul-23	27-Sep-24
Section 3 (Generating System #2)		
Material Procurement	22-Dec-22	22-Apr-24
Civil Works	15-May-23	07-Nov-24
Solar Array Construction	11-Jul-23	07-Nov-24
R2 Validation Testing¹		
Section 2 Generating System #1	26-Jun-24	06-Jan-25
Section 3 Generating System #2	26-Jun-24	19-Mar-25
Practical Completion		
Practical Completion – All Sections	-	06-May-25

3.3 Key stakeholders

The stakeholders in the Stubbo Solar project include regulators, project stakeholders and community stakeholders. Table 3.2 lists the key stakeholders.

¹ R2 validation testing involves remote compliance testing of the installed plant (inverters) to establish that the installed plant performs as expected and complies with the performance requirements set out in the Generator Performance Standards (GPS).

Table 3.2 Key stakeholders

Regulators	Project stakeholders	Community stakeholders
<ul style="list-style-type: none"> • Department of Planning and Environment • Mid-Western Regional Council • NSW Rural Fire Service (NSW RFS) • Department of Climate Change, Energy, the Environment and Water (DCCEEW) (Commonwealth) • Transport for NSW (TfNSW) • SafeWork NSW • Forestry Corporation of NSW • Essential Energy 	<ul style="list-style-type: none"> • ACEN • PCL • Transgrid • Balance of Plant (BoP) Civil Contractor • BoP Mechanical Contractor • BoP Electrical Contractor • Operations and Maintenance (O&M) Contractor • Specialist subcontractors • Specialist consultants • Transport and logistics companies • Project financiers/ investors • Robson Civil (access road construction contractor) • Mid-Western Regional Council (Blue Springs Road upgrade contractor) 	<ul style="list-style-type: none"> • Leaseholders • Other neighbours • Local business owners • Local employers • Local employees • Local accommodation providers • Employment, training and education providers • Non-profit groups and social enterprises • Registered Aboriginal Parties (RAPs)

4 Regional profile

This section provides a regional socio-economic profile of the MWR, Dubbo Regional (DR) and Warrumbungle Shire (WS) Local Government Areas (LGA) to provide the context for assessing accommodation and employment issues. The MWR LGA is the primary focus of this AES as the Stubbo Solar project is within its boundary and the development consent requires the project is developed in consultation with MWRC.

4.1 Regional context snapshot

The social area of influence, or social locality for the project is defined as the Mid-Western Regional Local Government Area (LGA) as it is expected that the primary area of influence of the project is likely to be Mudgee and Gulgong, and to a lesser extent the remainder of the Mid-Western Regional LGA. Gulgong is the closest township to the project. The project is approximately 10 km north of Gulgong.

It is unlikely that all local workforce and accommodation needs for Stubbo Solar will be sourced from the MWR LGA, with the remaining needs likely to be met by workers and resources/services from DR and WS LGAs. Therefore, a summary of general regional data is provided in Table 4.1.

Table 4.1 General information, population and economic data for the MWR, DR and WS LGAs

LGA	MWR LGA	DR LGA	WS LGA	NSW
Area (km ²) ¹	8,752	7,536	12,380	809,400
Functional Economic Region (FER) ²	Mid-Western FER	Central Orana FER	Castlereagh FER	N/A
Seat of Council ¹	Mudgee	Dubbo	Coonabarabran	N/A
Population ³	25,713	54,922	9,225	8,072,161
Projected population to 2041 ⁴ (and Annual % change)	29,649 (+0.77% pa)	63,599 (+0.78% pa)	7,598 (-0.89% pa)	9,872,934 (+0.95% pa)
Population median age (years) ³	42	36	46	39
Aboriginal and/or Torres Strait Islander	6.8%	16.6%	10.7%	3.4%
Population in the workforce (people aged 15 years and over) ³	11,895 (57.8%)	26,334 (60.7%)	3,619 (47.2%)	3,874,012 (58.7%)
Unemployment rate (Dec 2022) ⁵	1.8%	3.5%	4.9%	3.0%

LGA	MWR LGA	DR LGA	WS LGA	NSW
Gross Regional Product⁵ (GRP, \$billion)	\$3.436 B	\$4.0 B	\$0.516 B	\$643.145 B (Gross State Product)
Economic output⁵ (\$billion)	\$6.545 B	\$7.901 B	\$0.957 B	\$1.302 trillion
Largest output generating sector⁵ (\$billion)	Mining (\$3.659 B)	Construction (\$1.374 B)	Agriculture, forestry and fishing (\$0.327 B)	Manufacturing (\$187.226 B)
Largest employment sector⁵	Mining (2,217 jobs)	Health care and social assistance (5,391 jobs)	Agriculture, forestry and fishing (900 jobs)	Hospitals (except Psychiatric Hospitals) 153,159 jobs
Median weekly income³	\$1,486	\$1,597	\$1,068	\$1,434
Median weekly rent³	\$330	\$300	\$200	\$330
Median monthly mortgage repayments³	\$1,671	\$1,755	\$922	\$1,733
SEIFA Index of Relative Socioeconomic Disadvantage (IRSD) score and ranking⁵	960 (218/544)*	967 (239/544)*	913 (82/544)*	N/A
Total number of homeless people as of 2021⁶	43	241	33	35,011

Sources:

1. LGA website
2. NSW Government webpage – <https://www.nsw.gov.au/regional-nsw/regional-economic-development-strategies#toc-functional-economic-regions-fers>
3. ABS 2021a Census data
4. NSW Government -Planning web page - <https://www.planningportal.nsw.gov.au/populations>
5. REMPlan web site (REMPAN 2023), ABS 2013, ABS 2016a and ABS 2018
6. ABS 2021b Census - <https://www.abs.gov.au/statistics/people/housing/estimating-homelessness-census/2021>

*544 LGAs in Australia ranked in order of Socio-Economic Indexes for Areas for the Index of Relative Socio-economic Disadvantage most disadvantaged to least disadvantaged

As shown in Table 4.1 and as of the ABS Census 2021, Dubbo Regional LGA has the largest population, workforce, economic output, GRP and the highest Socio-Economic Indexes for Areas (SEIFA) score and ranking of the three LGAs (and therefore the least disadvantaged of the three LGAs). A description of the SEIFA indexes can be found in the Technical Paper *Socio-*

Economic Indexes for Areas (SEIFA) 2016 (ABS, 2018). Both DR LGA and WS LGA unemployment rates for quarter four in 2022 (3.5% and 4.9% respectively) are higher than that for NSW (3.0%), whilst MWR LGA has the lowest rate for unemployment (1.8%). Of the three LGAs, DR LGA had the highest number of homeless people in the 2021 Census. Populations up to 2041 are projected to increase in both MWR LGA (4,203 people) and DR LGA (9,188 people) with but at lower annual rates than those projected for NSW (around 0.2% less). The population of WS LGA is projected to decrease by 1,494 people at a rate of -0.89% pa by 2041.

The MWR LGA’s main industries as of the ABS Census 2021 include mining, construction, retail, agriculture and healthcare. The main towns include Mudgee, Gulgong, Kandos and Rylstone (MWRC 2023). The main industries for DR LGA are health care and social assistance, construction, retail trade and education and training, whilst those for WS LGA include agriculture, forestry and fishing, education and training, health care and social assistance and retail trade (REMPPLAN 2023).

The main urban centres in the MWR, DR and WS LGAs are listed in Table 4.2. The data shows that Dubbo is the largest locality in terms of population whilst Wollar is the smallest of the assessed localities. The main localities for DR LGA are Dubbo and Wellington, whilst those for WS LGA are Coonabarabran, Dunedoo and Coolah.

Table 4.2 Localities with relevance to the development

Location	LGA	Distance from Stubbo Solar project (km)	Development relevance	2021 Census Population (ABS 2021a)
Mudgee	Mid-Western Regional Council	36	Major regional centre and largest town in MWR LGA	12,563
Gulgong		10.5	Closest town to the project and closest regional centre	2,057
Kandos		74.5	Within commuting distance	1,208
Rylstone		69	Within commuting distance	624
Cassilis		43	Within commuting distance	278
Ulan		13	Location of the Ulan and Moolarben coal mines	81
Wollar		34	Township and location of the Wollar SF (pending construction) and Wilipinjong Mine	52
Coonabarabran	Warrumbungle Shire LGA	174	Not within commuting distance, major regional centre and seat of WS LGA	2,387
Dunedoo		29	Within commuting distance	725
Coolah		92	Within commuting distance	722

Location	LGA	Distance from Stubbo Solar project (km)	Development relevance	2021 Census Population (ABS 2021a)
Baradine		220	Not within commuting distance	586
Binnaway		140	Not within commuting distance	399
Mendooran		103	Within commuting distance	275
Dubbo	Dubbo Regional LGA	127	Within commuting distance, major regional centre, city and seat of DR LGA	38,783
Wellington		87	Within commuting distance, large town	4,581
Geurie		97	Within commuting distance	460
Eumungerie		159	Not within commuting distance	384
Mumbil		111	Within commuting distance	298
Stuart Town		121	Within commuting distance	241
Merriwa		Upper Hunter Shire LGA	102	Within commuting distance

For the purposes of this AES, a maximum commute time in a vehicle to and from the Stubbo Solar project of 90 minutes one-way has been used to define the catchment of potential workforce accommodation. Given this, the localities of Coonabarabran, Baradine, Binnaway and Eumungerie are not considered further. The nearest locality to Stubbo Solar is Gulgong. The largest localities within commuting distance of Stubbo Solar include Dubbo, Mudgee, Wellington, Gulgong, Kandos and Merriwa.

4.2 Population

Population counts and projections for the three LGAs assessed for this AES are shown in Figure 4.1. This figure shows the population totals on the 2021 Census night for MWR LGA, DR LGA and WS LGA were 25,713, 54,922 and 9,225 people, respectively (ABS 2021a).

NSW Planning population projection data is available at LGA and Statistical Area (SA) 2 levels (NSW Government 2023a). Within the regional area, population projections for the LGAs indicate that:

- the population of MWR LGA is estimated to increase by 3,936 people from 25,713 in 2021 to 29,649 in 2041, representing a total increase of 15.3% and an average annual increase of 0.77%

- the population of DR LGA is estimated to increase by 8,677 people from 54,922 in 2021 to 63,599 in 2041, representing a total increase of 15.8% and an average annual increase of 0.78%
- the population of WS LGA is estimated to decrease by 1,627 people from 9,225 in 2021 to 7,598 in 2041, representing a total decrease of 17.6% and an average annual decrease of -0.89%.

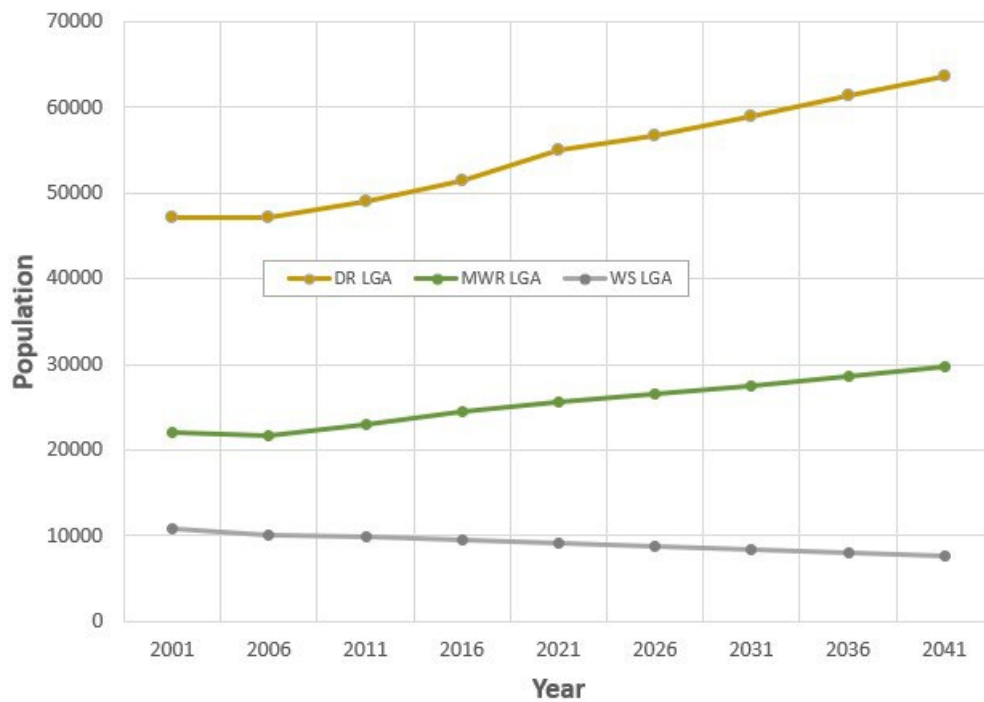


Figure 4.1 Historic and projected population change

The median population age in the MWR LGA is 42, which is three years older than NSW's median age of 39 (ABS 2021a). The median age in the DR LGA is 36, which is 3 years younger than the NSW median age. The median age in the WS LGA is 46, which is 7 years older than the NSW median age. Mudgee has the lowest median age of 36 in the MWR LGA, Dubbo has the lowest median age (35) in the DR LGA and Mendooran has the lowest median age (46) in the WS LGA.

The general age distribution for MWR LGA population and the other two LGA populations are shown in Table 4.3 using 2021 Census data (ABS 2021a).

Table 4.3 Population age distribution as a percentage of total

Age cohort	MWR LGA	DR LGA	WS LGA	NSW
0- 14 years	19.9%	21.0%	16.8%	18.2%
15-64 years	59.4%	61.8%	54.6%	64.2%
65 years or over	20.7%	17.3%	28.6%	17.7%

A comparison of the population statistics for MWR, DR and WS LGAs and the broader NSW population is shown in Table 4.3. The table shows there are slightly less people aged 15-64 years (working age) in the three LGAs compared to the state average of 64.2%. The percentage of the MWR and DR LGAs populations in youngest cohort exceed the state level percentage for the same cohort; conversely, the percentage of the WS LGA population in the youngest cohort is slightly less than the state average. The WS LGA has the largest percentage of its population in the oldest cohort, which also exceeds the state equivalent by nearly 11%.

4.3 Regional economy

A summary of some economic indicators is provided in Table 4.4.

The parameters in Table 4.4, including output, gross regional product, number of jobs and number of businesses, provide a snapshot of the prevailing economic status of the three LGAs.

Table 4.4 A summary of economic indicators for the AES LGAs

Parameter	MWR LGA	DR LGA	WS LGA	Orana RDA	NSW
Economic output	\$6,545 M	\$7.901 B	\$957.1 M	\$21,301 M	\$1,302.3 B
No. jobs	11,716	26,650	3,108	54,887	3,672,240
GRP 2021	\$3.436 B	\$4.0 B	\$0.516 B	\$10.408 B	\$643.145 B (GSP)
GRP per capita	\$133,616	\$72,515	\$55,038	\$85,896	\$86,121
GRP per worker	\$293,246	\$149,444	\$166,106	\$204,470	\$191,519
Largest exporting sector	Mining \$3,477 M	Manufacturing \$531.9 M	Agriculture, Forestry and Fishing \$288.7 M	Mining \$5,843 M	Financial and insurance services \$45,823 M
New house approvals 2021-22	109 (23 in 20-21)	283 (380 in 20-21)	6 (5 in 20-21)	439 (451 in 20-21)	29,443 30,493 in 20-21)
Businesses (as of June 2022)					
Non-employing	1,731	3,277	836	8,818	494,253
1-4 employees	766	1,484	308	3,756	273,066
5-19 employees	299	603	96	1,379	74,855
20-199 employees	54	125	6	240	18,869

Parameter	MWR LGA	DR LGA	WS LGA	Orana RDA	NSW
>200 employees	6	3	1	22	1,696
Total number of businesses	2,856	5,492	1,247	14,215	862,769

Source – REMPLAN 2023

The economic output data represents the gross revenue generated in each of the industry sectors in the defined region. The DR LGA has the greatest output of the three LGAs, contributing 37.1% of the \$21.301 billion output generated in the Orana Regional Development Area (RDA). Dubbo generated 86.9% of the output and Wellington generated 8.3% with the remainder generated by the rest of the LGA. The MWR LGA generates 30.7% of the Orana RDA output; the mining industry contributes 55.9% of the LGA’s output. WS LGA contributed 4.6% to the Orana RDA (REMPPLAN 2023).

The Gross Regional Product (GRP) is the total value of goods and services produced in a regional economy. The GRP for the MWR LGA is estimated to be \$3.436 billion, a considerable increase when compared to the 2016 GRP of \$1.933 billion. This equates to +33% of the Regional Development Area – Orana’s GRP, 0.5% of NSW’s Gross State Product (GSP) and 0.2% of Australia’s Gross Domestic Product (GDP) (REMPPLAN 2023).

The MWR LGA per capita and per worker GRPs (measures of a region’s output per person or per worker respectively) exceed those of the other LGAs, the Orana Regional Development Area (RDA) and NSW. The per capita and per worker GRPs for both DR LGA and WS LGA fall below those for the Orana RDA and NSW, with those for the WS LGA being the lowest.

As of June 2022, there were 2,856 registered businesses in MWR LGA, an increase of 591 businesses compared to the 2018 total of 2,265 businesses (MWRC 2018a). It is anticipated that the current and pending renewable energy projects will provide short term opportunities for local businesses during the construction and likely decommissioning phases within the MWR LGA and others nearby including DR LGA and WS LGA.

4.4 Labour and employment

As shown in Table 4.3 above, there is a slightly smaller proportion of people aged 15-64 years (working age) in the MWR, DR and WS LGAs compared to the state labour force participation average (59.4%, 61.8% and 54.6% respectively versus 64.2%). The employment statistics for the three LGAs are shown in Table 4.5. The 2021 Census data shows that the percentage of full time and part-time employed populations for the three LGAs were lower than the NSW working population. However, this type of comparison may be considered redundant given the percentage of workers who neither stated their hours worked and/or their employment status. The unemployment rates and percentage of workers away from work were lower than the NSW figures for the same parameters.

The December 2022 LGA unemployment data shown in Table 4.5 shows the MWR LGA unemployment rate is 1.3% lower than the NSW rate released in February 2023 whilst the DR LGA and WS LGA unemployment rates are higher by 0.4% and 1.8%, respectively.

Table 4.5 Employment statistics for the three LGAs

Parameter – Employment status	MWR LGA (%)	DR LGA (%)	WR LGA (%)	NSW (%)
Worked full-time	50.3	54.2	42.9	55.2
Worked part-time	28.1	24.7	24.4	29.7
Away from work	4.3	3.5	3.0	10.2
Unemployed	1.8*	3.5*	4.9*	3.1**
Hours not stated	1.9	1.7	2.0	-
Status not stated	11.9	12.8	23.1	-

Sources – ABS Census 2021 Quick Stats

*REMPPLAN 2023 (Economy – Trends – Unemployment; December 2022 figure)

**NSW Government – Media release published 16 Feb 2023 ([webpage link](#))

Industry of employment data for the three LGAs is shown in Figure 4.2 (data sources ABS 2021a). The following industrial sectors had the largest share of the workforce at the time of the 2021 Census:

- Mid-Western LGA: mining (1,820 workers), health care and social assistance (1,269 workers), retail trade (1,053 workers), construction (954 workers) and accommodation and food services (899 workers)
- Dubbo Regional LGA: health care and social assistance (4,798 workers), retail trade (2,422 workers), education and training (2,404 workers), construction (2,301 workers) and public administration and safety (2,060 workers)
- Warrumbungle Shire LGA: agriculture, forestry and fishing (937 workers), education and training (405 workers), health care and social assistance (403 workers), retail trade (243 workers) and public administration and safety (225 workers)

In Regional NSW, the largest employer at the time of the 2021 Census was the accommodation and food services sector, followed by administration and support services, manufacturing, agriculture, forestry and fishing and construction sectors.

The distribution of occupations across the three LGAs is shown in Figure 4.3. The top three occupations in the MWR LGA as of the 2021 Census are technicians and trades workers, professionals and managers (17.5%, 14.1% and 13.9% of the workforce, respectively), with 12.9% of the workforce employed as machinery operators and drivers and 11.4% employed as labourers.

MWRC has stated during the AES consultation process that the availability of skilled workers is limited and is a key vulnerability and issue for the region (Umwelt 2022a). Skilled workers including engineers, builders, tradespeople, and childcare and health professionals are anticipated to be in the highest demand over the next few years to cater for continued population growth, new commercial developments and major state significant projects such as Stubbo Solar and other projects in the region. Key stakeholders are working co-operatively to

attract and retain a diverse and skilled workforce to address local industries and business workforce needs (MWRC 2022).

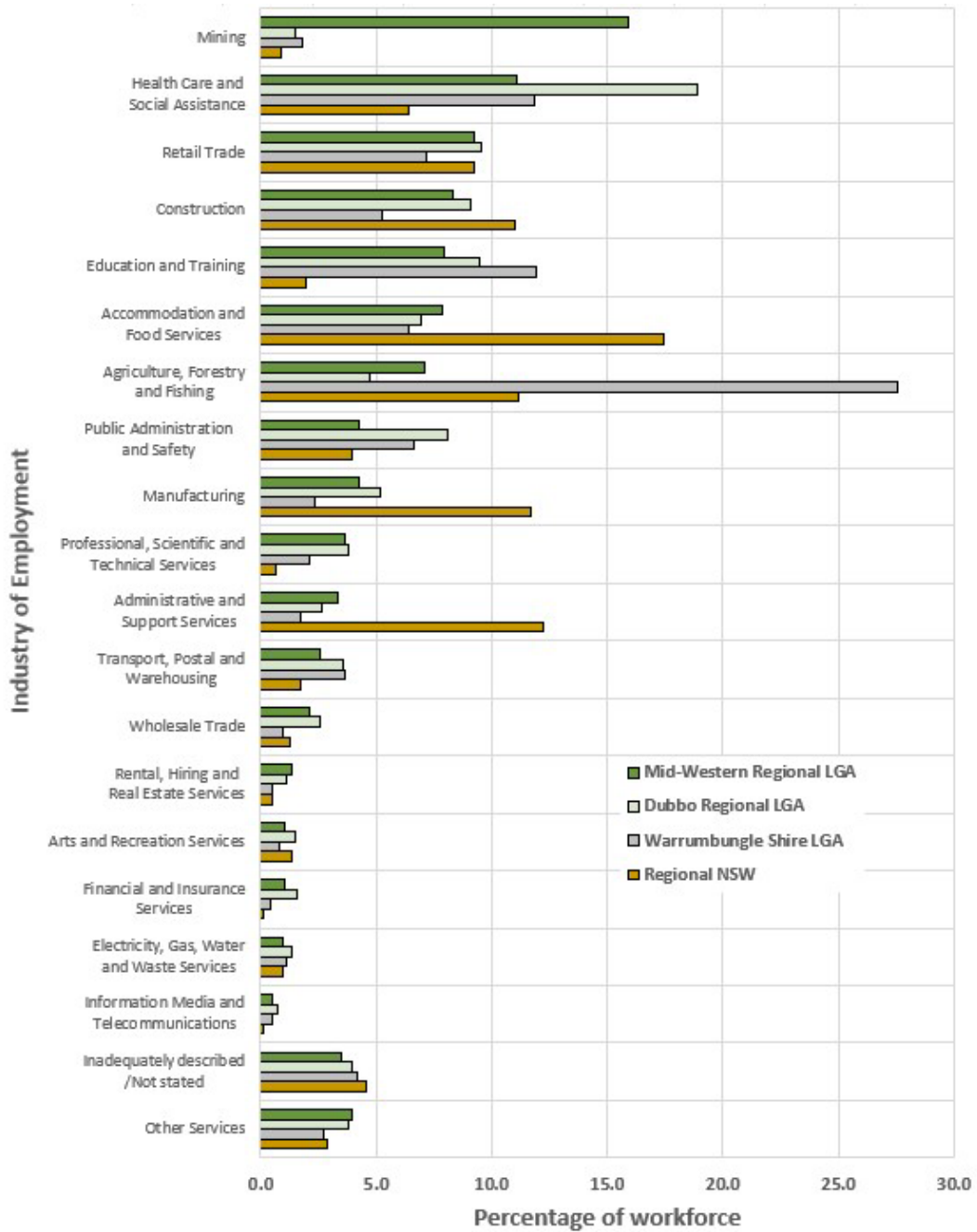


Figure 4.2 Percentage of workforce employed in various industrial sectors

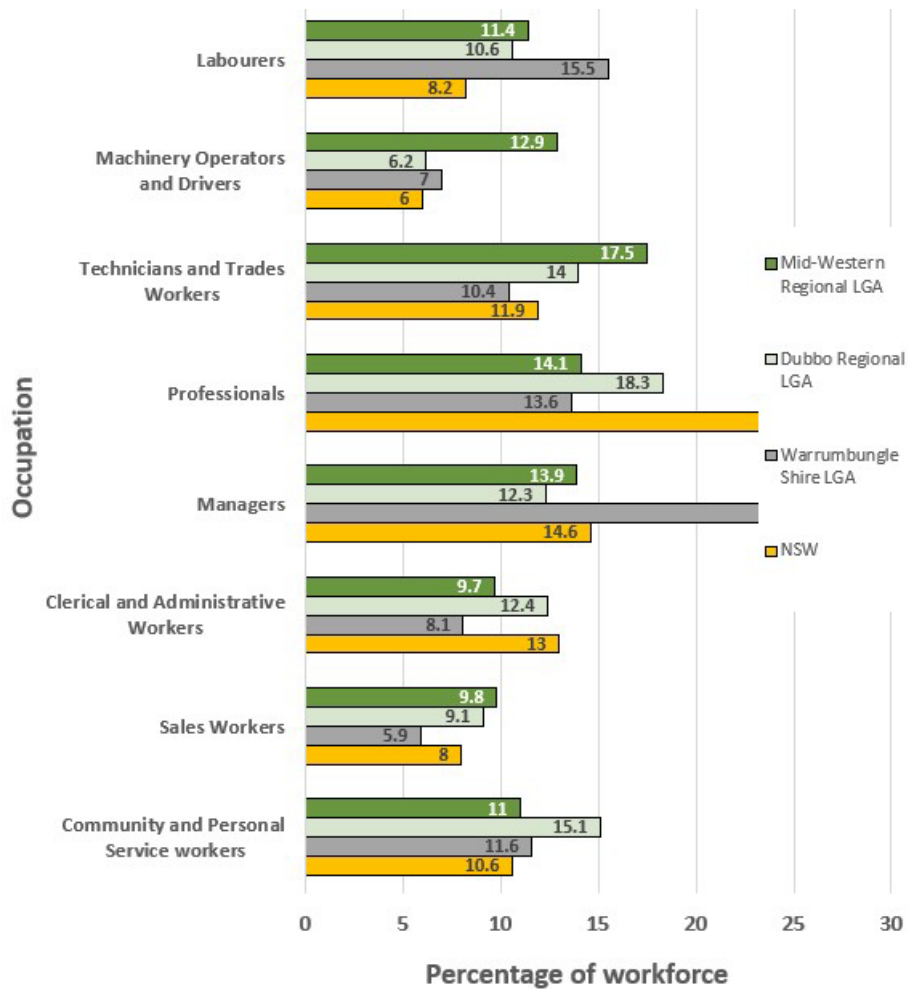


Figure 4.3 Workforce employment by occupation

Almost 75% of Australian jobs in the renewable energy sector over the next 15 years are likely to be available for labourers, trades and technicians and professionals; with electricians, electrical trade assistants, mechanical trades and technicians, finance, business, legal and planning professionals and administrative staff generating the largest number of jobs (Briggs *et al* 2020).

4.5 Community facilities and services

The MWR LGA is crossed by major roads including the Castlereagh Highway, Wollar Road, Ulan Road and Bylong Valley Way.

Mudgee Airport (owned and operated by MWRC) connects locals and visitors with regular passenger and cargo air services to Sydney where connecting flights can be caught. FlyPelican operates services between Mudgee and Sydney through the week except for Tuesdays and Saturdays. Mudgee Airport also provides facilities for private aircraft and conference facilities. Dubbo Airport is within a 90-minute drive of the Project site and is serviced by flights from Regional Express, Jetstar, Link Airways, Qantas and Virgin Australia. Coolah Aerodrome is a 90-minute drive (based on TravelTime™ API isochrones used on the QGIS 3.28 Firenze desktop) to

the site. Wellington in DR LGA also has an operational aerodrome able to cater for small private aircraft.

The Wallerawang Gwabegar railway runs north to south through Mudgee and Gulgong. The Sandy Hollow Gulgong railway runs east from Gulgong to Sandy Hollow and the Gulgong Maryvale railway runs from Gulgong to the west.

The DR LGA is connected to the MWR LGA by the A32 Mitchell Highway and Goolma Roads south of Dubbo, and the Golden Highway (B84) and Spring Ridge Road to the east of Dubbo. The WS LGA connects to MWR LGA in the south via the Castlereagh Highway (B55) and Black Stump Way in the northeast.

The Mudgee Saleyards are located 10 km from the Mudgee CBD and facilitate livestock sales. Prime cattle and lamb sales are held every second Wednesday with cattle store sales held on the last Thursday of every month.

Gulgong is the closest town and regional centre to the development. Mudgee is the largest town in MWR LGA. Both have similar services, though there are fewer services in Gulgong.

A summary of some of the available facilities and services in various localities in the MWR, DR and WS LGAs are shown in Table 4.6.

Services also available include:

- community services including Meals on Wheels, community transport, family day care, supported employment for people with disabilities
- various sports grounds
- various skate parks, recreational parks and playgrounds
- showgrounds (in the larger localities)
- community gardens
- range of sporting clubs and activities including golf, yoga, fishing, football, cycling, horse racing and gyms
- bakeries, cafes, restaurants and over 40 cellar doors featuring local wines, thriving art community, galleries, museums, national parks and community and farmers markets.

4.5.1 Health and medical facilities.

The AES for the nearby Wollar Solar Farm states MWRC has provided advice regarding the limited medical facilities available (Umwelt 2022a).

Research undertaken for the Social Impact Assessment for the Birriwa Solar and Battery Project (which is another ACEN project in development) identified that the demand for health services in the MWR LGA region has increased, partly due to population increases, aging populations with chronic conditions, limited availability of GPs in the area, general understaffing and increasing travel distances to see specialists (EMM 2022b). These findings are also supported by outcomes in recent Parliamentary Legislative Council review of health and hospital services in rural, regional and remote NSW. The report states that the healthcare

system in rural, regional and remote areas are 'in crisis, resulting in poorer health outcomes' (Parliament 2022).

Table 4.6 A summary of services available in local centres

Facility	MWR LGA				DR LGA						WS LGA		
	Mudgee	Gulgong	Kandos	Rylstone	Dubbo	Wellington	Geurie	Eumungerie	Mumbil	Stuart Town	Dunedoo	Coolah	Mendooran
Council offices	1	1	0	1	1	0	0	0	0	0	0	1	0
Post office	1	1	1	1	4	1	1	1	1	1	1	1	1
Police station	1	1	1	1	1	1	1	0	0	1	1	1	1
Fire Services	2	2	1	1	3	2	0	0	0	1	1	1	0
SES	1	0	0	1	1	0	0	0	0	0	1	1	1
Ambulance station	1	1	0	1	1	1	0	0	0	0	1	1	1
Hospital	1	0	0	0	1	1	0	0	0	0	1	1	0
Health and dental services	2, 5	2, 1	2, 0	2, 0	15, 17	3, 1	0, 0	0, 0	0, 0	0, 0	3, 2	2, 0	1, 0
Airport/aeropark	1	0/1	0	0/1	1	1	0	0	0	0	0	1	0
Railway station – C= closed, O = Operational S = seasonal	C	C	S	S	O	O	O	C	C	O	C	C	C
Pharmacy	3	1	1	0	10	3	0	0	0	0	1	1	0
Banks/credit unions A = ATM only	5	1	1	A	15	2	0	0	0	0	0	0	0
Supermarkets	3	2	1	1	10	2	1	0	0	0	1	1	0
Places of worship	10	4	3	3	22	8	1	1	0	1	2	4	3
Swimming pool	1	1	1	0	1	1	1	0	0	0	1	1	1
Petrol station/mechanic	9, 9	4, 5	2, 5	2, 2	20, 20	6, 11	1, 2	0, 0	1, 0	0, 0	2, 3	3, 3	1, 1
Cinema	0	0	0	0	1	0	0	0	0	0	0	0	0
Pre-schools, schools and TAFE/college	8, 3, 1	2, 2, 1	1, 2, 0	0, 1, 0	15, 19, 8	4, 5, 1	0, 1, 0	0, 1, 0	0, 1, 0	2, 1, 0	1, 2, 1	0, 2, 0	1, 1, 0
Real-estate agents	8+	3	2	0	17	2	0	0	0	0	2	2	0

PCL and Transgrid will take all actions possible to ensure residents' access to the local health and medical facilities are not compromised by the risk of increased cumulative stress on available facilities by the proposed construction workforce. Mitigation options are discussed in Section 11.3. A list of medical facilities and services available in the MWR, DR and WS LGAs are provided in Appendix D.

4.6 Tourism in the area

Tourism attracts over 691,000 visitors annually to MWR LGA and makes a sizeable contribution to local employment (678 jobs or 5.8% of total employment) and revenue (MWRC 2023). Consultations during the preparation of the Stubbo Solar EIS with MWRC, the Mudgee Tourist Information Centre and local short-term accommodation providers indicated there was an increase in domestic travel associated with the COVID-19 pandemic, resulting in a tourism boom in the region (Ramboll, 2020). Mudgee was named the 2021 NSW Top Tourism Town in the category of towns with a population over 5000 (Business NSW 2023). The area is known to attract a constant stream of visitors to its national parks and nature reserves, cellar doors, large events and festivals, galleries, museums and markets throughout the year, placing a significant demand on short-term accommodation.

MWRC is actively developing sustainable tourism within its boundary with a view to increasing the number of events and patronage beyond current levels. The availability of short-term accommodation to service current and future visitor numbers is a vital prerequisite in growing the tourist industry. The Mid-Western Regional Economic Development strategy has identified tourism as a significant component of the local economy.

MWRC estimates there are approximately 3,200 short-term rooms with an average occupancy rate of 80% (EMM 2022b). However, the number of short-term beds will be higher as some rooms will have more than one bed. The occupancy rates were confirmed by accommodation providers during a desktop survey of accommodation in the Gulgong and Mudgee areas in February 2023.

The scheduled events in the three LGAs for 2023 and 2024 are shown in Table 4.7. Annual events in the MWR LGA include but are not limited to those listed in Table 4.7 (EMM 2022c). A more comprehensive list of events is provided in Appendix C. The event dates give an indication of periods of peak tourist demand for accommodation. MWRC articulated during discussions with Accent in March 2023 that tourism numbers are constant throughout the year, with the exception of February when visitor numbers temporarily decline (MWRC personal communication).

Some events can cause spikes in visitor numbers, for example up to 10,000 beds are required for the NRL matches held in the MWR LGA (with two matches in 2023; the Charity Shield and match in April), and around 24,000 beds were required for the Parkes Elvis Festival in DR LGA (Parkeselvisfestival 2023). Similar patterns of visitor numbers are anticipated in 2024. Whilst there is high weekend demand for tourist accommodation, mid-week demand will be high during school holidays. July is busy with Field Days and School Holidays. September is busy with Food and Wine Month, Flavours of Mudgee and School Holidays (Umwelt 2022a).

Table 4.7 Annual events in MWR LGA (indicative only)

Event	Date
Rylstone/Kandos Show	February
NRL Charity Shield, Mudgee	February
Gulgong Show	February
Mudgee Show	March
Mudgee Classic cycle event	May
Henry Lawson Festival, Gulgong	June
Gulgong Cup Races	June
Small Farm Field Days, Mudgee	July 2023
Mudgee Running Festival	August
Mudgee Wine and Food Month	September
Flavours of Mudgee	September
Gardens of Mudgee	October
Sculptures in the Garden	October
Rylstone Street Festival	November
Mudgee and Gulgong Races	Various

The Dubbo Region already supports a thriving tourism industry with well-known attractions including the Taronga Western Plains Zoo and is implementing various strategies and projects to become the primary inland visitor destination in NSW and Australia (DRC 2023). Works are scheduled for completion in April 2023 and include:

- reclamation and development of the heritage plaza at Old Dubbo Goal
- construction of a Wiradjuri Tourism Centre
- development of the Macquarie Foreshore as a cultural events precinct.

Warrumbungle Shire Council is working with two other councils to develop a tourism hub with the aim of increasing the number of visitors to the region. The area is well known for tourist attractions such the Warrumbungle National Park.

In addition to tourism, accommodation services in the MWR, DR and WS LGAs cater for a large influx of seasonal and itinerant workers for mining and agribusiness particularly during harvest periods.

4.7 Existing housing context

The Energy Corporation of NSW (EnergyCo) is a statutory authority established to lead the delivery of the CWOREZ. Both the MWR and DR LGAs are located within the REZ. EnergyCo has undertaken various investigations and stakeholder consultation regarding potential cumulative impacts and their mitigation, opportunities, local priorities and benefit sharing. The resulting

report 'Central-West Orana Renewable Energy Zone – Coordination community impacts and benefits in the REZ' discusses issues including housing and accommodation (EnergyCo 2023). During the time of publishing the community impacts and benefits report, EnergyCo was working with 11 Candidate Energy Generators, including ACEN and the Stubbo Solar project.

EnergyCo's report identifies significant housing and accommodation constraints in the REZ, with limited supply of short-term and long-term housing further confounded by the risk of demand for short-term accommodation exceeding the available supply. Population forecasts in the MWR and DR LGAs indicate the need for more permanent housing. In the meantime, like many other locations in NSW, the area is experiencing a decrease in mortgage and rental affordability due to increasing house prices and weekly rents relative to household incomes (DPIE 2021b).

A desktop survey of median house prices and weekly rental costs was conducted for Dubbo, Mudgee and Dunedoo (locations representing DR LGA, MWR LGA and WS LGA respectively) using the Realestate.com.au website. The data shown in Figure 4.4 shows a general upward trend in the median house and apartment prices, whilst Figure 4.5 shows a general upward trend in rental rates. Median rental data for Dunedoo, Cassilis and Coolah was not available.

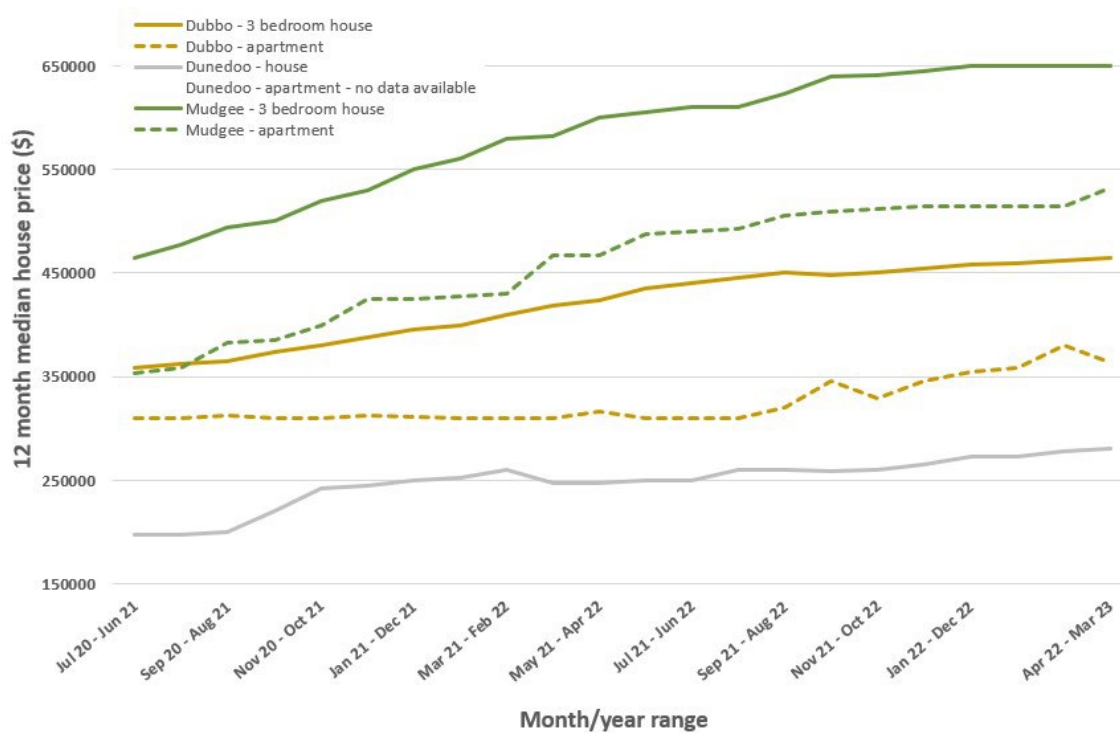


Figure 4.4 Review of median house prices for localities within MWR LGA, DE LGA and WS LGA

MWRC has requested that short-term accommodation (hotels and motels) used for tourism be preserved for that purpose. Therefore non-local workers should seek alternate short-term accommodation (e.g. Airbnbs), or other accommodation types in the LGA. Where demand exceeds supply, accommodation in other locations such as DR LGA and WS LGA could be considered (the MWRC request is provided in Appendix E). As a result of this request, the sourcing for short-term accommodation has been extended to the DR and WS LGAs. The

accommodation strategy has been developed to prioritise accommodation in MWR LGA. If the use of accommodation in DR and WS LGAs unavoidable, consultation will be undertaken with DRC and WSC.



Figure 4.5 Review of median rental rates for localities within MWR LGA, DE LGA and WS LGA

5 Workforce estimates

The Stubbo Solar workforce needs will present various employment opportunities to the local communities within the three LGAs, to the broader regional community and to that of NSW in general.

PCL and Transgrid will award subcontracts for components including civil, electrical and mechanical, and testing and commissioning works to perform the construction activities and envisage the following short-term needs as outlined in Table 5.1. The contract periods listed below are estimates, some of which may overlap. Employment targets have been included in Table 5.1 and these targets are based on the aspiration of having at least 10% of the workforce sourced from the local community.

PCL and Transgrid's preferences are to source employment locally, either directly employing local workers or contracting local businesses. However, it is noted that some of the works required are highly specialised and may need to be sourced from outside the local region. Any specialist contractors that are not available from the local community are likely to come from across other areas of NSW and, possibly, Victoria and will be accommodated as close to Stubbo Solar as is practicable.

The overall anticipated number of construction workers on site will be in the order of 520 people at the peak of construction. The workforce will be comprised of local workers and non-local workers and are defined as follows:

- **Local workers:** workers already resident in the region within commuting distance)
- **Non-local EPC contractors:** non-local EPC contractor site personnel (comprising up to 21 managers during the peak construction period)
- **Other non-local workers:** workers not resident in the region who will temporarily relocate to the region and reside within it to fulfil work requirements.

5.1 Construction

Full construction activities for Stubbo Solar project are many and diverse and are planned to commence in May 2023. These include:

- Section 1 substation procurement activities commenced in December 2022. Construction activities are planned to commence in May 2023 and will continue to May 2024
- Section 2 generating system (southern area) procurement activities commenced in December 2022 with an anticipated construction completion date of September 2024
- Section 3 generating system (northern area) procurement activities commenced in December 2022 with an anticipated construction completion date of November 2024
- R2 validation testing is scheduled to commence in June 2024 with an anticipated completion date of March 2025

- Project closeout activities will commence in May 2025 and continue until May 2027 (including a 24-month defects liability period during which PCL will be operating the solar project).
- The operational start date is anticipated to be March 2025.

Table 5.1 Stubbo Solar project short-term employment requirements and employment targets

Contract type	Period	Types of work	Worker numbers required and employment targets
Road upgrades	Completion May 2023	Blue Springs Road upgrade, Internal Access Road construction	Outside scope of this AES (Stage 1 of the Development)
Civil	4 to 5 months	Amenities set up	Up to 144 personnel Employment Targets mostly local MWRC LGA opportunities (80% or more depending on availability) – predominantly be earthmoving and trenching contractors
		Internal site road and lay-down area construction	
Substation	10 months	Substation construction	20-30 personnel Employment Targets 5-10 local MWRC LGA opportunities – predominantly trades assistants and labourers
Mechanical	10 months	Tracker and panel installation	Up to 156 personnel Employment Targets Up to 17 (approximately 12%) local MWRC LGA opportunities – predominantly labourers
Electrical	10 months	Cable Installation	Up to 232 personnel Employment Targets Up to 25 (approximately 12%) local MWRC LGA employment opportunities would predominantly be labourers and, potentially, subcontractors
		Trenching	
		Commissioning	
Testing and commissioning	2 months	Testing and commissioning	10 to 15 personnel
Estimated total workforce at construction peak			520 personnel

Based on the employment analysis shown above in Table 5.1, approximately 88% of the short-term workforce are expected to be from outside the MWRC LGA, which equates to 458 personnel. However, the current estimated number of workers from outside the MWRC LGA is

363 excluding EPC contractor staff as the intent is to recruit local civil contractors from within the MWRC LGA to undertake the substantial civil works required during the Stubbo Solar Construction phase. The number of potential civil construction workers from within the MWRC LGA was estimated following research conducted by the EPC contractor regarding the ability of civil construction companies from within the MWRC LGA to undertake civil works at Stubbo Solar. By comparison, the proportion of electrical and mechanical workers from within the MWRC LGA is expected to be around 12% with the remaining 88% of these positions to be filled by workers from outside the MWRC LGA.

5.1.1 Early works phase

The early works comprise multiple tasks, many requiring specialist skills. Some tasks such as engineering design, development permit applications and management plan drafting will not require site attendance and therefore will not require accommodation in the locality of the project. Other tasks such as onsite pile testing, geotechnical site investigations and site mobilisation will require site attendance and the possible accommodation of workers.

5.1.2 Construction phase workforce estimates

The workforce required to construct the substation and Sections 2 and 3 Generating System #1 and #2 (southern and northern sections of site, respectively) is shown in Table 5.2. Works are scheduled to commence in May 2023 and be completed March 2025. Multiple tasks are scheduled to be completed in this time, many of which occur concurrently or have some overlap with other tasks, including:

- civil works
- solar array construction
- security system installation and commissioning
- weather station installation and verification
- commissioning (electrical, SCADA and inverter)
- substation and switchyard construction
- validation testing.

The indicative schedule of the required civil works and the estimated workforce numbers and targets for local personnel are shown in Table 5.2. MWRC has indicated in various meetings with ACEN and Accent that there is a current scarcity of local suitably skilled workers from within the MWRC LGA as the majority are already employed on various local projects. MWRC envisages this situation will continue for the foreseeable future. This information has been considered for the estimated local personnel numbers shown in Table 5.2 (including Transgrid personnel).

It is assumed that local workers from the MWRC, DRC and WSC LGAs are already accommodated and are unlikely to require short-term or long-term accommodation and have therefore have not been considered further in relation to accommodation needs. The peak construction period is assumed to be from November 2023 to August 2024 inclusive (ten

months) when the estimated workforce exceeds 50% of the total workforce (i.e., is greater than 260 personnel) as shown in Table 5.2 and Figure 5.1.

Table 5.2 Estimated personnel and local employment targets for the construction phase

Timing	Non-local personnel Peak (estimate)			Local personnel peak (estimate)			Worker percentage (%)		PCL site personnel	Total personnel (estimate)
	Civil	Electrical	Mechanical	Civil	Electrical	Mechanical	Non-local	Local		
May 2023	5	2	0	26	0	0	21	79	3	36
June 2023	5	2	0	26	0	0	21	79	3	36
July 2023	4	2	5	21	0	1	33	67	3	36
Aug 2023	6	5	10	30	1	1	40	60	5	58
Sep 2023	8	16	16	40	2	2	48	52	8	92
Oct 2023	12	30	45	60	2	3	57	43	15	167
Nov 2023	20	50	75	100	3	5	57	43	21	274
Dec 2023	21	90	90	105	9	9	62	38	21	345
Jan 2024	21	90	90	105	13	13	61	39	21	353
Feb 2024	24	140	120	120	16	14	65	35	21	455
Mar 2024	23	184	138	115	22	17	69	31	21	520
Apr 2024	18	207	138	92	25	17	73	27	21	518
May 2024	18	207	138	92	25	17	73	27	21	518
Jun 2024	12	180	140	60	20	16	78	22	21	449
Jul 2024	11	158	105	53	18	12	77	23	21	378
Aug 2024	6	138	83	28	18	11	80	20	21	305
Sep 2024	2	105	44	9	9	4	87	13	17	190
Oct 2024	1	72	30	6	6	3	87	13	12	130
Nov 2024	1	48	20	4	6	3	84	16	8	90
Dec 2024	1	30	13	3	4	2	83	17	5	58
Jan 2025	0	10	5	1	2	1	79	21	2	21
Feb 2025	0	10	5	1	2	1	79	21	2	21
Mar 2025	0	10	5	1	2	1	79	21	2	21

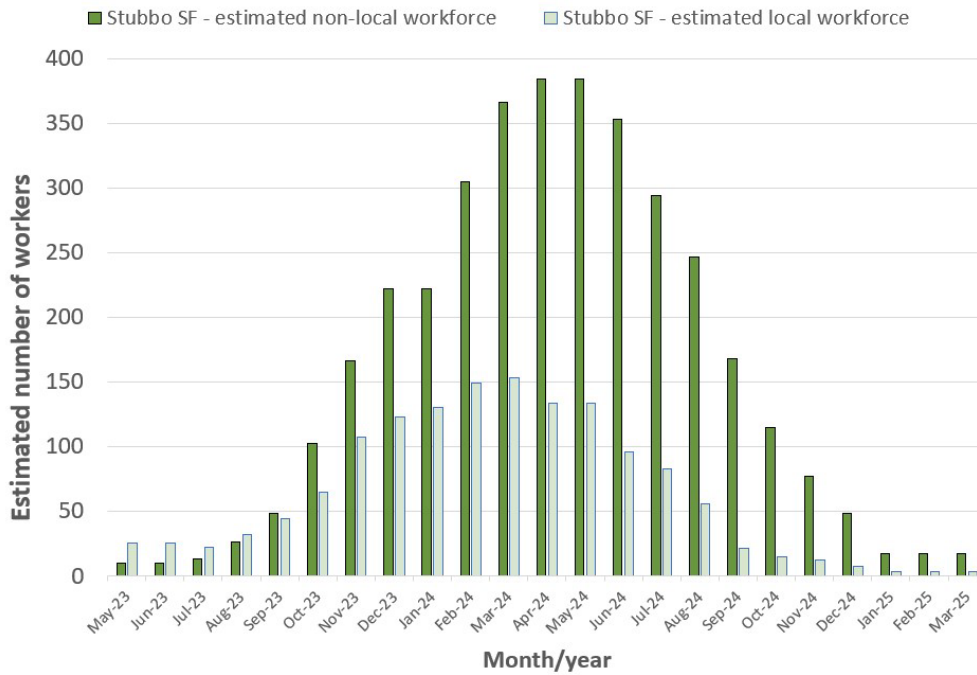


Figure 5.1 Stubbo Solar project estimate construction workforce.

Figure 5.2 shows the percentage distribution of Stubbo Solar Project’s local and non-local construction workers. From May to September 2023, the percentage of local workers is likely to exceed the percentage of non-local workers. This is due to proposed local sourcing of civil contractors, availability permitting, for the large-scale civil works scheduled early in the construction process. From October 2023, the percentage of non-local workers is expected to increase, reaching a maximum of 89% by September 2024.

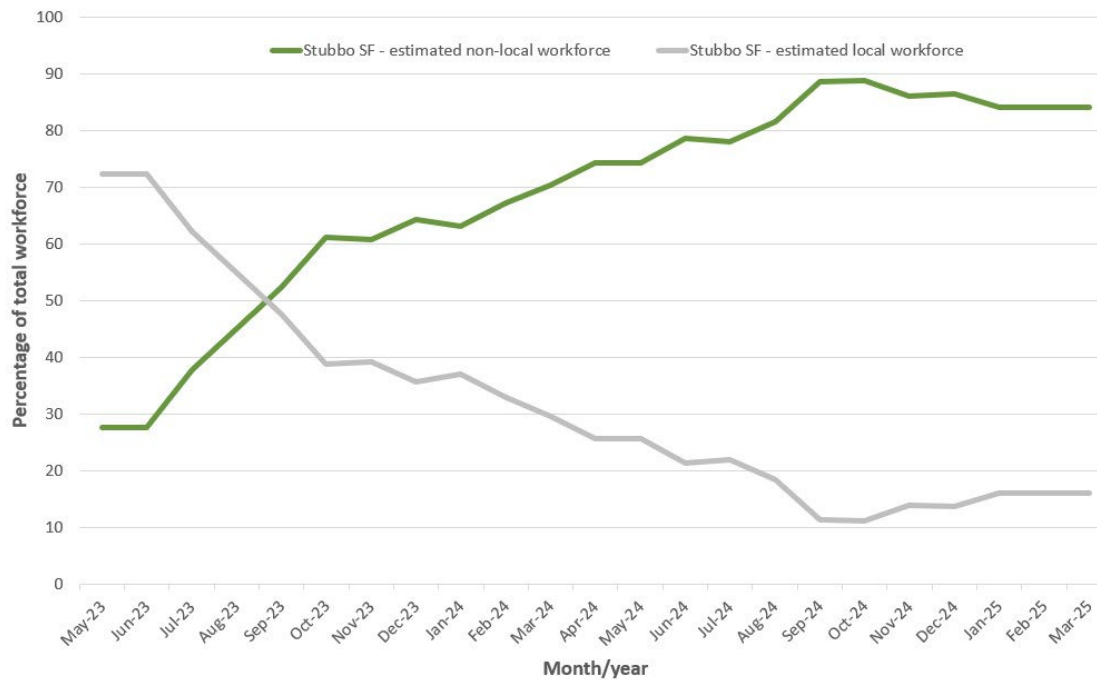


Figure 5.2 Estimated Stubbo Solar Project workforce percentage composition

5.1.3 Other economic opportunities

During construction other economic opportunities that may flow on from the Stubbo Solar construction works within the three LGAs include:

- catering services
- groceries purchased within the LGAs by incoming workforce
- patronising of hospitality, food and beverage businesses by incoming workforce for meals and entertainment
- logistics services
- landscaping and grounds maintenance
- fencing
- cleaning
- traffic control
- security services.

Mudgee, Dubbo, Wellington and Dunedoo host campuses of TAFE NSW, and these educational facilities or other comparable facilities could be used for training of construction and operation staff. The potential for TAFE engagement is discussed in Section 8.6.

5.1.4 Project closeout

Project closeout is scheduled to commence in May 2024 (the practical completion of Section 1) and runs to approximately May 2025 (the practical completion of all sections). This will be followed by a two-year defect liability period which includes operation and maintenance.

6 Cumulative impacts

6.1 Interaction with other projects

Cumulative impacts may occur if the construction phases of nearby major projects overlap in part, or in full, with the construction of Stubbo Solar. This section identifies major projects within the MWR, DR and WS LGAs with the potential to cause cumulative impacts regarding access to accommodation and services. Some cumulative impacts can be beneficial in terms of economic benefits, and the possible migration of skilled workers to the area to work across consecutive projects. EnergyCo's recently published report (EnergyCo 2023) is the result of a detailed assessment of the potential impacts of multiple network upgrades required to enable the connection of various renewable energy projects to the grid. The assessment includes detailed consultation with stakeholders including local communities and local government. The report presents information on studies regarding:

- road upgrades
- industry, training and skills
- waste and circular economy
- telecommunication
- social infrastructure
- housing and accommodation.

As discussed in Section 4, accommodation services in the MWR, DR and WS LGAs cater for a large influx of seasonal and itinerant workers for mining and agribusiness particularly during harvest periods, as well as catering for tourism. The influx of non-local workers during the construction of various renewable projects has the potential to overwhelm current short- and long-term accommodation supply. Therefore, a range of accommodation options is needed to cater for the temporary workforce demand, including the pending influx of renewable energy sector workers.

Potential cumulative impacts due to large-scale projects running concurrently have been considered in the Stubbo Solar EIS (Ramboll 2020) and for the Central-West Orana REZ (EnergyCo 2023). In particular, the potential concurrent construction of the Wollar Solar Farm may impact workforce and accommodation availability, affect regional road networks with additional vehicle movements and place extra demand on local services. These impacts would be dependent on the final timing and duration of construction activities associated with the two projects.

Table 6.1 identifies the current SSD and State Significant Infrastructure (SSI) projects identified in the MWR, DR and WS LGAs within an 80 km radius of Stubbo Solar as of April 2023 (the date of this AES). The table includes renewable energy projects, infrastructure projects and a mining project together with an assessment of the likelihood of cumulative impacts with Stubbo Solar.

Table 6.1 SSDs and SSIs in the Central-West Orana renewable Energy Zone

Project name	Project phase	Estimated construction start	Estimated workforce		Estimated duration of construction	LGA	Km to Stubbo Solar	Likelihood of competing for accommodation and services
			Construction	Operation				
Central-West Orana Renewable Energy Zone (REZ) infrastructure project SSI-48323210	Prepare EIS	2025	650 jobs	unknown	42 months	WS, MWR, DR and Upper Hunter	Varies	Unlikely, Stubbo Solar construction is likely to be completed before project start
Ulan Solar Farm SSD-46406974	Prepare EIS	unknown	120 jobs	4 jobs	8-12 months	MWR	6	Unlikely, Stubbo Solar construction is likely to be completed before project start
Tallawang Solar Farm SSD-23700028 Note this project may share a workforce with Barneys Reef Wind Farm; construction start date provided by ACEN	Response to submissions	2025	270 jobs	7 jobs	34 months	MWR	7	Unlikely, Stubbo Solar construction is likely to be completed before project start A workers accommodation camp is expected to be required for projects connecting to the CWOREZ.
Barneys Reef Wind Farm Note this project may share a workforce with Tallawang Farm; construction start date provided by ACEN	Prepare EIS	2025	340 jobs	10 jobs	28 months	MWR	8	Unlikely, Stubbo Solar construction is likely to be completed before project start A workers accommodation camp is expected to be required

Project name	Project phase	Estimated construction start	Estimated workforce		Estimated duration of construction	LGA	Km to Stubbo Solar	Likelihood of competing for accommodation and services
			Construction	Operation				
								for projects connecting to the CWOREZ.
Birriwa Solar (an ACEN project) SSD-29808870	Response to submissions	2025	560 jobs	unknown	28 months	WS, MWR	9	Possible overlap in 2025, however a workers accommodation camp is proposed as part of the Development Application
Bellambi Heights Solar SSD-33344237	Prepare EIS	Unlikely before end 2025	400 jobs	Up to 8 jobs	12-18 months	MWR	11	Unlikely due to project phase; Stubbo Solar construction will likely be complete. A workers accommodation camp is expected to be required for projects connecting to the CWOREZ.
Orana Wind Farm	Planning development	2026	600 jobs	unknown	24 months	MWR, WS	17	Unlikely due to project phase; Stubbo Solar construction will likely be complete.
Dunedoo Solar Farm	Approved	unknown	100 jobs	unknown	10-12 months	WS	30	Unlikely based on industry knowledge.
Dapper Solar Farm SSD-52217961	Prepare SEARs	2025	350 jobs	15-20 jobs	18-24 months	WS	31	Unlikely due to project phase; Stubbo Solar construction will likely be complete.

Project name	Project phase	Estimated construction start	Estimated workforce		Estimated duration of construction	LGA	Km to Stubbo Solar	Likelihood of competing for accommodation and services
			Construction	Operation				
Cobbora Solar Farm SSD-29491142	Prepare EIS	2024	700 jobs	unknown	36 months	WS	34	Unlikely due to project phase; Stubbo Solar construction will likely be complete.
Sandy Creek Solar Farm SSD-41227735	Prepare EIS	2024	700 jobs	15	24 months	WS	35	Unlikely due to project phase; Stubbo Solar construction will likely be complete.
Wollar Solar Farm SSD-9254	Approved	2023	35-- 400 jobs	5 jobs	12-18 months	MWR	40	Likely overlap of construction phase during 2023, 2024 and 2025.
Spicers Creek Wind Farm SSD-41134610	Prepare EIS	2025	250 jobs	12 jobs	24-30 months	DR, WS	40	Unlikely due to project phase; Stubbo Solar construction will likely be complete.
Valley of the Winds Wind Farm (an ACEN project) SSD-10641	Response to submissions	2024	400 jobs	50	24-42 months	WS	42	Possible in 2024 and 2025, however a workers accommodation camp is proposed as part of the Development Application
Bowdens Silver Project SSD-5765	Recommendation	unknown	320 jobs	131	18 months	MWR	49	Possible-- Independent Planning Commission hearing was held in Feb 2023 and the project was approved on 3 Apr 2023;

Project name	Project phase	Estimated construction start	Estimated workforce		Estimated duration of construction	LGA	Km to Stubbo Solar	Likelihood of competing for accommodation and services
			Construction	Operation				
								likely to accommodate non-local workers in Kandos-Rylstone locality.
Uungula Wind Farm SSD-6687	Post approval, contracting and financing	Unknown	250 jobs	12 jobs	24-30 months	DR	50	Possible, wind farm construction has not yet commenced, currently at the post approval, contracting and financing stage(https://www.squadronenergy.com/our-projects/uungula-wind-farm). Uungula AES states accommodation in the Wellington area will be sought (Squadron Energy 2023).
Liverpool Range Wind Farm SSD-6696 – approved March 2018 SSD-6696-Mod-1	Response to submissions	2024	800 jobs	unknown	24-36 months	WS, MWR, Upper Hunter	52	Unlikely as will be connecting to CWOREZ. A workers accommodation camp is expected to be required for projects connecting to the CWOREZ.
Phoenix Pumped Hydro (an ACEN project)	Planning development / feasibility	2026	Not known	Up to 50 jobs	48 months	MWR	54	Unlikely due to project phase; Stubbo Solar

Project name	Project phase	Estimated construction start	Estimated workforce		Estimated duration of construction	LGA	Km to Stubbo Solar	Likelihood of competing for accommodation and services
			Construction	Operation				
								construction will likely be complete.
Burrendong Wind Farm SSD-8950984	Prepare EIS	unknown	250 jobs	15 jobs	24-30 months	MWR	58	Unlikely due to project phase; Stubbo Solar construction will likely be complete.
Maryvale Solar Farm SSD-8777 SSD-8777-Mod-2	Response to submissions	Late 2023	400 jobs	10 jobs	12 months	DR	75	Possible – likely to accommodate non-local workforce in Wellington and Dubbo.
Wellington North Solar Farm, SSD-8895	Approved, DC issued 21 Apr 2021	unknown	400 jobs overall (peak of 250)	4 jobs	18-24 months	DR	80	Possible – likely to accommodate non-local workforce in Wellington and Dubbo.
Narragamba Solar (an ACEN project)	Scoping Report	2025-2026	400	5	24 months	MWR, WS	0	Unlikely due to project phase. A workers accommodation camp is proposed as part of the Development Application

It should be noted that ACEN has been updating the cumulative impact assessment as part as its other renewables projects in the CWOREZ, such as Valley of the Winds, Birriwa and Narragamba Solar. As a result, ACEN is across all potential cumulative impacts despite the Stubbo Solar EIS having been prepared nearly three years in advance of the AES.

The likelihood column in Table 6.1 is populated using a combination of current project information available online (from the NSW Major Projects website and renewable energy project websites) combined with current industry knowledge provided by ACEN, such as knowledge of EPC contracts that have been tendered or awarded.

Construction of the nearby Beryl SF (SSD-8183) is complete and is now operational, employing three full-time staff. A request to modify the site development consent (SSD_8183_Mod-2) regarding screening requirements is under assessment. The Bodangora Wind Farm (WF) located 15 km east of Wellington and Wellington SF have not been considered in terms of accommodation impacts as both sites are now operational.

Inland Rail's Narromine to Narrabri project (SSD-9487) may impact accommodation in the Dubbo and Wellington localities though it is possible that existing temporary workforce facilities located in Narrabri (Narrabri Village) may be used to accommodate up to 500 workers (InlandRail 2020) but has not been included in Table 6.1 as the project is located beyond the 80 km radius. Narromine is approximately 40 km west of Dubbo and 90 km northwest of Wellington (30 minutes and 70 minutes commute one-way respectively by motor vehicle). It is possible some project workers may seek accommodation in the Dubbo and Wellington localities, in the unlikely event that suitable accommodation not be available in MWR LGA.

6.1.1 Projects likely to impact Stubbo Solar accommodation and labour requirements

The following projects may have an impact on skilled labour and accommodation availability throughout the Stubbo Solar construction phase:

Wollar Solar Farm

The planning application for the Wollar Solar Farm (Wollar SF) is approved and early phase construction works have commenced with an EPC contractor in place to implement the build (Wollar Solar 2023). Wollar SF is expected to require an estimated 360 beds at its peak of construction in July of 2023 (Umwelt 2022a). This estimate was calculated by assuming that up to 10% of the 400 workers will be sourced locally where feasible. According to the Wollar AES, accommodation requirements during the Wollar SF construction were expected to increase from March 2022 onwards with the workforce peak anticipated between February 2023 and March 2024. A construction activity peak of 8 months is expected between March and October 2023 (Umwelt 2022a). The number of workers at the Stubbo Solar project will increase between March 2023 and August 2024. It is likely there will be an overlap of peak construction phases between these two projects and that sourcing adequate accommodation and services may be an issue. It has been assumed that 90% of the peak construction workforce of Stubbo Solar may require accommodation concurrently with the peak of Wollar SF (estimated at 360 workers) although it is likely that the Wollar SF development may be 4 to 6 months ahead of Stubbo Solar project.

It is likely the workers of Stubbo Solar project will need to consider accommodation requirements prior to construction as the Wollar SF workers may already be accommodated in the area.

6.1.2 Projects which may impact Stubbo Solar accommodation and employment requirements

The following potentially concurrent projects may impact the skilled labour and accommodation availability for some of the Stubbo Solar project construction phase (dependent on construction commencement dates and other factors influencing project execution):

Birriwa Solar project

The Birriwa Solar project application is currently at the Response to Submissions stage with assessment, recommendation and determination phases pending and is also an ACEN project. The Birriwa Solar project construction phase has been identified as having the potential to overlap with that of Stubbo Solar project (EMM 2022b), however this is currently being updated in the RtS report and Amendment Report that ACEN is preparing at the time of lodgement of this report. The developer now envisages the pre-construction works could commence in early 2025. The development approval is expected in Q1 2024, with Financial Investment Decision currently expected in Q3 2024, in line with the CWOREZ timeframes. ACEN is currently drafting an Amendment Report to include the assessment of an accommodation camp in the area, servicing the Birriwa Solar project and with the potential to service other ACEN's projects in the CWOREZ. The Birriwa Solar project is unlikely to have much impact on the labour and accommodation requirements for Stubbo Solar project.

Bowdens Silver mine

Bowdens Silver project is a mining project and was determined by the Independent Planning Commission on 3 April 2023. The project has been approved and there is potential for the 18-month construction to overlap with Stubbo Solar project. Approximately 320 construction jobs will be created (Corkery 2020). No construction dates or peak periods of construction have been provided in the EIS documentation.

Should construction commence in 2023, the workforce peak could overlap in part or in full with the workforce peak the Stubbo Solar project. It is assumed that 80% of workers could require accommodation concurrently to the peak of Stubbo Solar (Umwelt 2022a). Bowdens Silver has been in negotiations with Mid-Western Regional LGA regarding the servicing of non-local workforce accommodation requirements and is likely to seek accommodation east of the mine site in Kandos and Rylstone. The construction of a dedicated workforce camp may be a possibility and will be a consideration in the pending Accommodation and Employment Strategy (A. McClure 2023).

Central-West Orana Transmission project

This project includes multiple subprojects throughout the CWOREZ such as the Wollar Substation upgrade including:

- a new switching station at Wollar to connect to Transgrid's existing Wollar Substation

- new twin double circuit 500 kV and single and twin 330 kV transmission lines and associated infrastructure to connect energy and storage projects
- energy hubs at Merotherie and Elong Elong
- switching stations along the 330 kV infrastructure
- various road and site access works and utility adjustments.

It is likely the project will use a combination of local accommodation and services and bespoke worker camps to accommodate non-local workers. Given the likely timing of this project (construction possibly commencing in 2025), it is unlikely to impact the availability of accommodation for Stubbo Solar workers (ACEN personal communication).

Liverpool Range Wind Farm

A development consent was granted for the Liverpool Range WF on 24 March 2018. The development consent is subject to a modification application which is currently at the response to submissions stage, with the assessment, recommendation and determination phases pending.

If approved, construction could start in Quarter 3 of 2024 (Tilt 2022) and therefore the overlap with the Stubbo Solar project would be minimal. Construction will take between 24 to 36 months and generate up to 829 construction jobs (Epuron 2014). There is no detail of the number of local employees to be utilised or construction timing in the EIS, however, the latest community consultative committee meeting minutes cite project construction may commence in quarter three of 2024 and employ up to 800 workers (Tilt 2022).

Engagement with local stakeholders suggests that a maximum of 10% local employment on all renewable energy projects in the region is likely. It has been assumed that 25% of the peak construction workforce of Liverpool Range WF (or about 200 people) may require accommodation concurrently at the tail end of the construction of Stubbo Solar as the early stages of construction commence. The non-local workforce may seek accommodation in the Warrumbungle Shire, Mid-Western Regional and Upper Hunter Shire LGAs.

It is likely a project AES will be required prior to construction commencing. It will need to consider that the workers at other sites including Stubbo Solar and Wollar SF will be accommodated in the general area. As a project connecting to the CWOREZ, it is also possible this project requires a workers accommodation camp.

Uungula Wind Farm

The Uungula WF is located within the Dubbo Regional Council boundary. The project planning application has been determined and conditionally (by way of a development consent) approved. Two modification applications have also been determined with the latest modified, consolidated development consent granted and dated 7 May 2021. The development consent requires that works will commence between one to five years of the consent commencement date. Construction will take 24 to 30 months and require up to 250 construction workers (CWP Renewables 2020).

According to the project EIS, there is currently no proposal to install a workers' camp at the site. However, the Uungula AES published on 9 June 2023 (Squadron Energy 2023) and

developed in consultation with DRC cites a temporary worker camp as a possible option to accommodate project workers; the AES also states the accommodation options under consideration are centred around the Wellington area. Wellington is the closest township to the proposed wind farm and would provide some support services including temporary accommodation and worker convenience needs. A proportion of the project's servicing requirements would be supported by Dubbo. Dubbo has a larger supply of accommodation options, retail and entertainment services, and medical services, as well as a range of business geared to servicing large civil construction projects. (Eco Logical 2020).

It is likely the construction phases of Stubbo Solar and Uungala WF will overlap. However, it is unlikely that the Uungala WF project workforce will have any detrimental impact on accommodation required by the Stubbo Solar workforce as it is likely to be located beyond the Stubbo Solar accommodation catchment.

Wellington North Solar Farm

The Wellington North Solar Farm is located approximately 80 km west of Stubbo Solar. The project was granted a development consent which is dated 21 April 2021. The site is adjacent to Wellington Solar Farm (for which construction commenced in December 2019).

Early works (road upgrades) were scheduled to commence in 2022 using up to 30 workers with main construction using up to 400 workers, with a maximum of 250 workers at any given time, pending (Lightsource bp 2023). The project AES states that up to 50% of the workforce would be sourced locally; therefore, a maximum of 125 beds would be required to accommodate non-local construction workers (Umwelt 2022b). Non-local workers will likely be accommodated in the Wellington and Dubbo localities. As no definitive construction dates are provided for this project, it is not possible to state with any certainty that it will impact Stubbo Solar's non-local workforce, accommodation and service needs. However, it is possible the Wellington North project construction may overlap with that of Stubbo Solar and impact workforce recruitment and accommodation requirements.

Maryvale Solar Farm

Maryvale SF is located between Geurie and Wellington, approximately 37 km southeast of Dubbo and approximately 80 km east of Stubbo Solar. Though a development consent has been granted for the project (dated 4 December 2019), a modification application is lodged with the NSW Planning Department (SSD-8777-Mod-2) and is at the response to submissions phase. Though construction was estimated to commence in early 2024 with an anticipated operational date of late 2025, this timeframe is now subject to slippage.

Should a modified development consent be granted, the project will employ up to 400 construction workers. Given the potential slippage of the construction timeframe due to the processing of the development consent modification application, it is unlikely the Maryvale Solar Farm project will impact the workforce needs of Stubbo Solar as the latter has already commenced the recruitment process. There may be the possibility of construction phase overlaps which may cause accommodation impacts in the Dubbo and Wellington localities for the Stubbo Solar non-local workforce.

Bellambi Heights Solar Farm

Bellambi Heights SF is currently at the prepare EIS phase in the NSW planning system.

Should a development consent be granted, the peak construction workforce could be up to 400 employees and contractors (a proportion of which will be locals and not require accommodation) (EMM 2022d). The developer will consult local councils and business owners through the project development and assessment regarding managing potential impacts and opportunities for workforce accommodation. The developer proposes that the workforce be sourced from the local area as far as practicable. Though the project Scoping Report states non-local construction staff will likely use available rental and motel accommodation in surrounding townships and regional centres, it is likely alternative accommodation will be required to preserve the short-term accommodation currently servicing tourism needs. Potential cumulative impacts on accommodation, infrastructure, and services will be considered in the EIS as part of the social impact assessment.

If a development consent is granted that the current proposed construction commencement date is Q1 in 2025 (Vena Energy 2023), by which time, the Stubbo Solar PV installation (peak construction period) will be virtually complete. It is therefore likely any overlap between the Bellambi Heights SF and Stubbo Solar projects will have minimal accommodation impacts as the preconstruction phase may take approximately three months before construction ramps up.

Dapper Solar Farm, Spicers Creek Wind Farm, Sandy Creek Wind Farm, Burrendong Wind Farm and Cobbora Solar Farm

These projects are currently at the prepare Secretary's Environmental Assessment Requirements (SEARs) or prepare EIS phases in the NSW planning system. If a development consent is granted, it is unlikely that construction will commence until mid-2024, by which time, the Stubbo Solar peak construction period will be entering a gradual decrease in construction workforce numbers. It is therefore unlikely that any of these projects will impact the Stubbo Solar workers' accommodation and service needs.

Orana Wind Farm

Orana WF is currently in planning development and has yet to enter the NSW planning system. It is unlikely this project will impact the Stubbo Solar workers' accommodation and service needs.

6.1.3 Estimate of accommodation needs for SSD projects

Table 6.2 estimates the combined number of construction workers requiring accommodation. Peak construction periods usually span several months rather than a calendar year. It is likely that the construction periods for up to five renewable energy projects and one mining project may overlap with the Stubbo Solar project. It is unlikely the peak construction periods for the projects listed in Table 6.2 will overlap exactly as projects are subject to multiple factors influencing start dates and milestone delivery which in turn influences a variety of project requirements including workforce needs.

Table 6.2 Non-local SSD workers requiring accommodation

Project	Estimated personnel requiring accommodation (a 90% non-local worker ratio has been applied to the personnel figures)		
	2023	2024	2025
Stubbo Solar	Up to 222	Up to 384	17
Wollar SF ¹	Up to 360	Up to 106	0
Uungala WF	Not known	Up to 270 ³	Not known
Valley of the Winds WF	-	0 ⁴	0 ⁴
Barneys Reef WF	-	-	85
Tallawang SF	-	-	108
Bowdens Silver	288	Not known	Not known
Liverpool Range WF	0	200-800	Not known
Dunedoo SF	Not known	Not known	Not known
Bellambi Heights SF	-	-	Not known
Birriwa Solar	-	-	0***
Maryvale Solar Farm	Not known	Not known	Not known
Wellington North Solar Farm ²	Up to 125	Up to 110	Up to 15
Total No. of workers	995	760 – 1,400	225

Sources: ¹Umwelt (2022a), ²based on Figure 1.3 and a proposed start month of April 2023, Umwelt (2022b), ³Squadron Energy (2023) and ⁴ACEN – A workers camp solution is proposed as part of the accommodation solution.

The figures in Table 6.2 are for calendar years and represent a worst-case scenario. This is an estimate and likely will be subject to variation during the execution of the projects.

6.2 Potential cumulative impacts

The construction of the Wollar SF commenced in February 2023, the commencement of construction at Stubbo Solar is imminent and construction at the Liverpool Range WF is likely to commence in quarter three or four of 2024. It is likely the combined demand on available accommodation by these workforces may impact the MWR LGA short-term accommodation availability. The workforce figures provided in the Wollar SF AES (Umwelt 2022a) have been combined with those for Stubbo Solar project. The results are shown in Figure 6.1. The estimated number of workers does not take into account any delays which would potentially impact construction worker numbers.

As stated in the Wollar SF AES, it is expected the non-local workforce will seek local (Mudgee-Gulgong area) short-term and long-term accommodation options and that the anticipated peak construction workforce will occur between July and October 2023 (Umwelt 2022a).

The non-local workforce of Stubbo Solar project will only seek short-term accommodation further afield in the Dubbo Regional and Warrumbungle Shire LGAs should there be a shortfall in the accommodation proffered within MWR LGA. Non-local Stubbo Solar construction workers will source short- and long-term accommodation in MWR LGA as discussed in Section 7, and possibly beyond as some localities in the Upper Hunter Shire LGA are within commuting distance of the project site. This outcome follows in-depth discussions between MWRC and ACEN with the aim of maintaining short-term accommodation to service the local tourist industry which is currently thriving and contributes significantly to the local economy. The NSW Tourism Industry Council awarded Mudgee the gold medal as Australia’s Top Tourism Town (population over 5,000) at the inaugural 2021 Australian Top Tourism Awards.

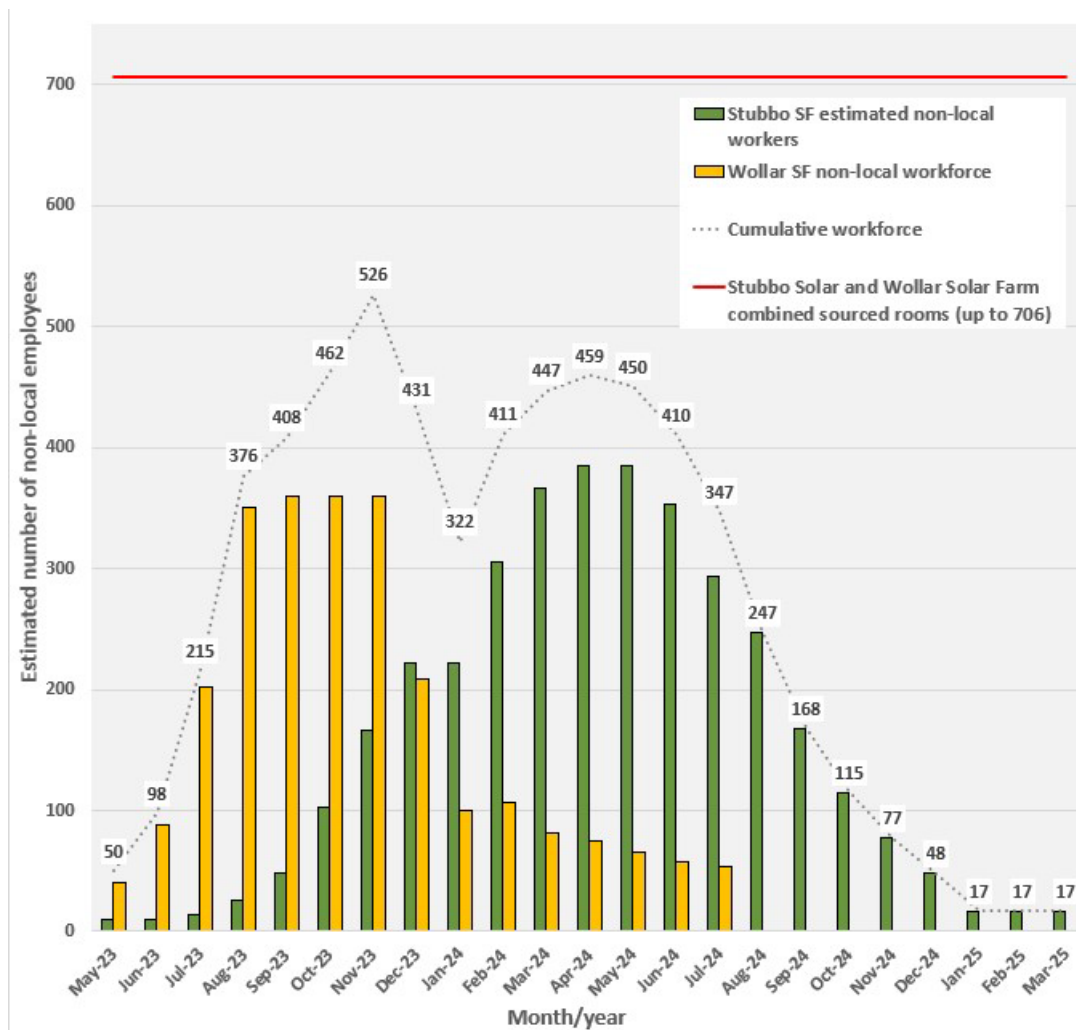


Figure 6.1 Estimated combined non-local workforce of Stubbo and Wollar renewable energy projects

Figure 6.1 shows that during the Wollar SF tail end construction, peak workforce (four months between August and November 2023) and will coincide with the commencement of the Stubbo Solar project construction. Demand for accommodation by these two projects could be around 376 to 526 beds between August and November 2023, dropping down to around 322 beds around January 2024, and peak at around 459 beds between February to June 2024, then

decreasing from July 2024 (347 beds) to below 250 beds in August 2024 and continue to decrease monthly through to March 2025.

The approved Wollar AES states that up to 342 rooms are expected to be available from July 2022 across a variety of accommodation types and locations (Umwelt 2022a)(see Appendix A of the Wollar Solar Farm AES). Accommodation types include hotels, motels, houses/cottages/apartments, conference centres, tourist parks and caravan parks. Locations include Mudgee, Gulgong, Sandy Hollow, Rylstone and Denman with accommodation also considered in Muswellbrook. The Wollar Solar Farm AES suggests little overlap with the potential accommodation sourced to date for the Stubbo Solar project. The 367 rooms sourced by Stubbo Solar combined with the 342 rooms sourced by Wollar Solar Farm amount to 709 rooms. This is more than sufficient to cater for the combined maximum estimated 526 non-local workers. Note there may well be some accommodation sharing by non-local workers to reduce costs which will reduce the number of rooms required.

The Accent accommodation research resulted conducted in February 2023 resulted in a conservative estimate of 1,825 short-term accommodation beds potentially available (see Section 7.2) in the MWR, DR and WS LGAs. However, this potential availability does not consider prevailing and future occupancy rates and variations in accommodation stock and its availability. Accommodation requirements are discussed further in Section 7.

6.3 Mining activities in the area

There are three coal mines within a 20 km radius of the Stubbo Solar site: Ulan, Moolarben and Wilpinjong Mines. Non-local mine workers are accommodated at the Ulan Village Green Camp or mine-owned properties in the area. There is no capacity to accommodate renewable energy workers at the Ulan Village Green Camp at this time as it is fully booked for the next two years (March 2025), and the accommodation of mine workers will take priority (personal communication, January 2023). General information for these mines is provided in Table 6.3.

Table 6.3 Summary of coal mining activity in Mid-Western Regional LGA

Mine	No. Employees	Area (ha)	Extraction limits	Location	Operations
Ulan	660	7,820	20 M tonnes/pa	25 km NE Gulgong	24/7
Moolarben	650	2,790	16 M tonnes/pa	25 km NE Gulgong	24/7
Wilpinjong	700	2,800	16 M tonnes p/a	48 km NE Mudgee	24/7

It is unlikely that non-local workers for these coal mines will impact accommodation availability for Stubbo Solar and are not considered further.

7 Accommodation strategy

This section provides the accommodation action plan and its justification by a review of available accommodation in the local area (up to a 90-minute commute by car, minibus or coach). It outlines options and actions to ensure there is sufficient accommodation for the estimated 363 Stubbo Solar non-local construction workers and up to 21 non-local management staff whilst safeguarding accommodation availability to service the tourism and agribusiness sectors in the MWR LGA.

7.1 Accommodation action plan

7.1.1 Key objectives

The key objectives of the AES for the Stubbo Solar development are:

- PCL, Transgrid and their subcontractors will facilitate the preservation of MWR LGA's short-term hotel and motel accommodation by prioritising short-term accommodation in other localities, noting there will be some use of these facilities in MWRC by people visiting the site for up to a week (e.g., auditors, specialist consultants, company executives, etc.)
- prioritise clusters of accommodation in the Mudgee and Gulgong areas, with traffic impacts minimised by shuttle services between accommodation and site
- prioritise use of local accommodation within a 90-minute drive from the project site to reduce impact on short-term and long-term accommodation demand
- reduce or avoid housing stress impacts that may result from the project
- prioritise procurement and employment of local businesses and workers where available
- avoid construction delays to mitigate any cumulative impacts with CWOREZ project construction
- consider the use of accommodation beyond the MWR LGA boundary in towns including Wellington and Dubbo (Dubbo Regional LGA) and Dunedoo, Coolah and Cassilis (Warrumbungle Shire LGA) if accommodation estimates in MWR LGA fail to meet non-local workforce housing requirements
- monitor and adapt the accommodation strategy throughout the construction phase regarding workforce needs, impacts on localities and in response to stakeholder feedback.

PCL, Transgrid and their subcontractors will work with local business owners and MWRC to minimise any adverse impacts on servicing tourism visitors needs as far as practicable. This will be achieved by non-local workers seeking accommodation other than hotels and motels in MWR LGA together with ongoing liaison with MWRC regarding workforce accommodation matters (Appendix A). It is important to note that the development approval allows construction works to take place from Monday to Friday, between 7 am and 6 pm, and between 8 am and 1 pm on Saturdays, unless the Secretary agrees otherwise.

7.1.2 Accommodation requirements

The construction of the Stubbo Solar project is expected to require up to 384 non-local workers (comprised of up to 363 construction workers and up to 21 management staff) with an estimated additional peak of 154 local workers. The majority of the estimated 154 local workers will be from local civil construction businesses. This figure has been estimated by PCL based on their research regarding the availability of local civil works companies employing local workers to fulfil potential civil works contracts at Stubbo Solar, as shown in Table 5.2. The peak of 384 non-local workers (73% of the workforce from April to May 2024; this figure includes up to 21 non-local PCL workers) will likely require short-term and longer-term accommodation. It is also likely there will be concurrent accommodation demands particularly with the Wollar SF project (Umwelt 2022a) as shown in Figure 6.1. As stated previously, project timeframes are subject to multiple factors influencing timing.

Whilst the primary focus of this AES is on local accommodation options (i.e., in MWR LGA), accommodation options in the DR and WS LGAs have also been reviewed as a precaution. Methods used include checking online booking websites, email and/or by phone contact and collation of accommodation expressions of interest received at events such as Employment information days and those received on through the project website (ACEN 2023). The review identified a range of options in MWR LGA for accommodating the peak construction period workforce which are described in the following sections. The peak construction period is assumed to be from November 2023 to August 2024 when the workforce exceeds 50% of the total workforce (i.e., is greater than 260 personnel) as stated in Section 5.1.2.

Although accommodation options such as purpose-built, temporary worker camps and local community members renting out rooms or ancillary dwellings en masse are a major consideration by EnergyCo for accommodating the CWOREZ workforce and the workforces of associated renewable energy projects (EnergyCo 2023), these options are at the feasibility stage and will likely not be available to the non-local Stubbo Solar workforce.

The accommodation assessment suggests there will be sufficient housing for the estimated 363 non-local Stubbo Solar workers and 21 non-local management staff with sufficient capacity to accommodate some of the Wollar Solar Farm construction workforce within the MWR LGA. Accommodation types include rooms in private residences, various managed properties e.g., via private landlords, Airbnbs, farm-stays, house-share and real estate agencies, and camp-style accommodation (e.g. conference centres and camp grounds/holiday parks).

Accommodation options as of May 2023 include over 80 managed properties, 31 rooms in private homes and up to 24 rooms in alternative private accommodation. It is likely expressions of interest regarding accommodation will continue, increasing the accommodation options available for non-local workers.

The accommodation strategy including indicative percentages of workforce in each accommodation category, is shown in Table 7.1 and summarised below:

Table 7.1 Indicative Stubbo SF non-local workforce accommodation requirements

Month	Room in a private house ¹		Rental (agent-managed) dwelling in Gulgong-Mudgee ¹			Private camp-style accommodation ¹		Cabin in Gulgong – Mudgee area		Airbnb etc. in Gulgong – Mudgee area		No. non-local workers	Total non-local workers and managers accommodated
	Rooms	Workers	Rentals	Workers	Managers	Rooms	Workers	Cabins	Workers	Airbnbs	Workers		
May-	7	7 (2%)	1	0	3	0	0	0	0	0	0	7	10
Jun-23	7	7 (2%)	1	0	3	0	0	0	0	0	0	7	10
Jul-23	11	11 (3%)	1	0	3	0	0	0	0	0	0	11	13
Aug-23	21	21 (6%)	2	0	5	0	0	0	0	0	0	21	26
Sep-23	31	31 (9%)	3	0	8	9	9 (2%)	0	0	0	0	40	48
Oct-23	31	31 (9%)	11	32 (9%)	15	24	24 (6%)	0	0	0	0	87	102
Nov-23	31	31 (9%)	30	90 (25%)	21	24	24 (6%)	0	0	0	0	145	166
Dec-23	31	31 (9%)	49	146 (40%)	21	24	24 (6%)	0	0	0	0	201	222
Jan-24	31	31 (9%)	49	146 (40%)	21	24	24 (6%)	0	0	0	0	201	222
Feb-24	31	31 (9%)	77	229 (63%)	21	24	24 (6%)	0	0	0	0	284	305
Mar-24	31	31 (9%)	88	237 ² (65%)	21	24	24 (6%)	18	18 (5%)	12	35 (10%)	345	366
Apr-24	31	31 (9%)	88	237 ² (65%)	21	24	24 (6%)	18	18 (5%)	18	53 (15%)	363 ³	384
May-24	31	31 (9%)	88	237 ² (65%)	21	24	24 (6%)	18	18 (5%)	18	53 (15%)	363 ³	384
Jun-24	31	31 (9%)	88	237 ² (65%)	21	24	24 (6%)	18	18 (5%)	8	22 (6%)	332	353
Jul-24	31	31 (9%)	75	218 ² (60%)	21	24	24 (6%)	0	0	0	0	274	295
Aug-24	31	31 (9%)	59	171 ² (47%)	21	24	24 (6%)	0	0	0	0	227	248
Sep-24	31	31 (9%)	24	96 (26%)	17	24	24 (6%)	0	0	0	0	151	168
Oct-24	31	31 (9%)	16	48 (13%)	12	24	24 (6%)	0	0	0	0	103	115
Nov-24	31	31 (9%)	5	14 (4%)	8	24	24 (6%)	0	0	0	0	69	77
Dec-24	31	31 (9%)	2	0	5	12	12 (3%)	0	0	0	0	44	49
Jan-25	15	15 (4%)	1	0	2	0	0	0	0	0	0	15	17
Feb-25	15	15 (4%)	1	0	2	0	0	0	0	0	0	15	17
Mar-25	15	15 (4%)	1	0	2	0	0	0	0	0	0	15	17

Percentages are based on a peak of 363 non-local construction workers; the peak of 21 non-local workers will be accommodated in long-term rental accommodation in the Gulgong-Mudgee area.

¹As of 12 May 2023

²Some dwellings have one or two bedrooms rather than three (taken into account calculating the number of people accommodated)

³Total of 363 non-local construction workers excludes the 21 non-local management staff who will be accommodated in long-term rental accommodation.

Property type summary
Room in a private dwelling – 31
Private accommodation – 24
Rooms in agent-managed dwellings – 258
Cabins – up to 18
Rooms in an Airbnb – 53

- **Local workers:** it is assumed that all local workers (i.e., workers already resident in the region within commuting distance) will be accommodated in their existing accommodation. It is estimated, based on PCL's workforce assessment, that the local mechanical and electrical workforce may comprise 42 workers (8%) of the total peak workforce of 520 workers. It is estimated, based on PCL discussions with potential contractors, that the local civil contractor workforce may be up to 120 workers (23% of the total workforce) during peak construction (although the proportion will vary considerably depending on availability and the month of construction).
- **Non-local EPC contractors:** non-local EPC contractor site personnel (comprising up to 21 managers during the peak construction period) will be housed in long-term rental accommodation (up to seven rental properties assuming three bedrooms per property and one person per bedroom) within a 60 km commute to site.
- **Other non-local workers:** it is estimated that other non-local personnel (i.e., subcontractors to the EPC contractors) may comprise 363 workers (88% of the total workforce), although the proportion will vary considerably depending on local availability and the month of construction. These non-local personnel are expected to require either short-term (up to 6 months), or long-term accommodation (more than 6 months) (dependent on employment contract duration). To ensure minimal impact on tourism accommodation needs in MWR LGA, Stubbo Solar construction workers will seek types as follows (as shown in Table 7.1):
 - up to 9% of workers housed in private rooms in local homes (31 workers in total and 31 rooms) – note if more property owners are willing to let rooms during the construction period the number of non-local workers housed in this accommodation type could increase
 - up to 6% of workers housed in alternative private accommodation (24 workers in total)
 - up to 65% of workers housed in a managed property in the Mudgee-Gulgong area (assuming 3 bedrooms per rental and 1 person per room) (a total of 237 workers in up to 88 dwellings)
 - up to 5% of workers housed in Mudgee-Gulgong caravan and holiday parks (up to 18 workers and 18 cabins (assuming 1 person per cabin, however, it is likely that some workers will share cabins which have more than one bedroom which would reduce the number of cabins required. This would have the added benefit of preserving some cabin accommodation for tourist use. Cabin numbers in the Mudgee-Gulgong area exceed 100, so less than 20% of the existing cabin stock would be used to accommodate non-local workers)
 - up to 15% of workers housed in Airbnbs etc. in the Mudgee-Gulgong area (up to 53 workers) (assuming each Airbnb has 3 bedrooms per property and 1 person per room, 18 dwellings in total) in short-term or long-term arrangements (dependent on hosts being open to longer-term arrangements whilst also complying with relevant legislation, policy and regulations)

Note – though accommodation may be available in Dubbo Regional LGA (e.g., Dubbo and Wellington) and Warrumbungle Shire LGA (e.g., Dunedoo, Coolah and Cassilis), it is unlikely the non-local workforce will be required to venture beyond the Mid-Western LGA to source accommodation based on the accommodation potentially available in the Mudgee-Gulgong area (as sourced by accommodation review, expressions of interest via the Stubbo Solar website (ACEN 2023) and events such as the Employment Information Day held in Gulgong on 20 April 2023).

The indicative percentages of non-local workers and accommodation in Table 7.1 are based on the requirement to avoid hotel and motel accommodation in MWR LGA, offers of potential accommodation from local landlords, real estate agents and private homeowners, and an assessment of the remaining accommodation capacity. Hotels and motels are excluded to preserve MWR LGA’s short-term accommodation supply to service tourist demand, noting there will be some use of these facilities by people visiting the site for up to a week (e.g., auditors, specialist consultants, and company executives).

7.2 Accommodation outlook

The accommodation and food services sector not only supports visitors from outside the region but also is an important employer. The availability of short-term and long-term accommodation in the region can be limited. Demand for accommodation can exceed supply, particularly during events and festivals (MWRC 2018b).

For the purposes of this AES, short-term accommodation includes hotels, motels, self-contained units, serviced apartments, caravan parks and holiday parks. Longer-term accommodation includes privately-owned dwellings available under a formal lease agreement, boarding rooms in private residential dwellings, rooms in share houses (e.g., a co-renting agreement where shared spaces within a dwelling are separate from a private room), farm stays, caravan park and holiday park cabins and accommodation available through websites such as Airbnb and Stayz.

The renewable energy construction workforce accommodation demands will increase over the next few years due to the number of large-scale projects in the region (such as the CWO REZ) potentially placing additional demand on already limited availability accommodation. EnergyCo recently published a report which amongst other issues, identifying housing renewable energy project construction workers in the CWO REZ as a key challenge for government, industry and business due to the limited supply of various accommodation types (EnergyCo 2023). EnergyCo has identified various opportunities to help meet workforce accommodation demands in the REZ whilst simultaneously reducing potential impacts and maximising benefits for host communities. These opportunities include:

- embracing the key strategic strengths of the host LGAs in the REZ (MWR, WS, and DR LGAs) which are as follows:
 - MWR LGA – Mudgee’s location as a service centre for surrounding townships, the region’s diversified economy and the predicted population growth
 - WS LGA – access to substantial Crown land, the location of Dunedoo and proximity to multiple proposed renewable energy projects, together with some opportunities to support both long-term and temporary accommodation

- DR LGA – the City of Dubbo as a service centre to surrounding townships, access to Dubbo Airport, the diversified economy and the predicted population growth (EnergyCo 2023)
- construction of temporary worker camps using best practice in design and construction material selection to maximise resource efficiency:
 - use of local companies to provide camp services including catering, cleaning and transport where available
 - selecting camp locations to balance workforce needs with opportunities for communities
- repurpose worker camps to serve community housing needs such as social housing, aged care housing and tourism accommodation
- the re-use of existing buildings or extending existing buildings to create workforce accommodation (retrofitting is less resource intensive than developing a new building)
- long-term housing can be developed and leased as construction worker accommodation and later repurposed
- support and supplement the use of existing granny flats and ancillary buildings in communities as construction worker rentals.

These potential opportunities and solutions to construction worker housing will not be available for Stubbo Solar construction workers.

The following sections describe the short-term and long-term accommodation stock in the MWR LGA and the localities of Dubbo, Wellington, Dunedoo, Cassilis and Coolah and its availability for non-local Stubbo Solar construction workers.

7.2.1 Short-term accommodation availability

Short-term accommodation. Short-term occupancy rates across NSW in 2016 (the latest data available) were 76.4% for the June 2016 quarter based on licensed hotels with more than 15 rooms) (ABS 2016b). This is verified by occupancy rates for accommodation establishments in Dubbo between 2018 and 2021 averaging around 75%; however, the average occupancy rates for Wellington were around 50% for the same period (Umwelt 2022b).

A random selection of local (Mudgee-Gulgong) accommodation providers were contacted by email or phone to assess typical availability. All stated they generally operate at high occupancy rates (60-80%) Monday through Thursday, with occupancy rates increasing (trending towards 100%) at weekends, indicating competition for short-term accommodation in the area is already high. Indeed, during a meeting held on 14 March 2023 with ACEN, MWRC identified the operating capacity in the short-term accommodation sector as an issue and requested that non-local Stubbo Solar construction workers do not seek short-term accommodation within the LGA during the construction phase. This request was confirmed in by MWRC in writing (refer to Appendix E). In correspondence dated 9 May 2023 from MWRC to ACEN, MWRC requested accommodation options in Kandos and Rylstone be omitted due to the imminent large scale works at Bowden’s Silver Mine. During the planning process for the mine, the proponent stated that up to 320 workers would be required, with the non-local

workers likely to be accommodated close to the mine site in the Rylstone and Kandos areas (Appendix F). As a result of this, accommodation options in Kandos and Rylstone have been omitted from Appendix B.

A travel radius of 90 minutes one-way by motor vehicle has been selected to accommodate the requirement to omit short-term accommodation in MWR LGA. This radius extends to localities such as Dubbo, Wellington (both Dubbo Regional LGA), Dunedoo, Coolah and Cassilis (both Warrumbungle Shire LGA). As such, these are included in the accommodation assessment as a precaution should estimated accommodation availability in Mid-Western Regional LGA decline (see further discussion in Section 9.1).

Discussions between MWRC, EnergyCo and associated renewable energy projects regarding the limited short-term accommodation capacity are in progress, but the issue will not be resolved in time to cater for the imminent Stubbo Solar short-term accommodation requirements. A snapshot of accommodation types and number of rooms in the 90-minute commute radius is provided in Table 7.2.

Table 7.2 Regional short-term accommodation type summary

Location	Hotel		Motel		Holiday parks		B&B and other**		Airbnb - House /apartment		Total no. rooms per locality
	No.	Rooms	No.	Rooms	No	Cabins	No	Rooms	No.	Rooms	
Mudgee	Excluded*		Excluded*		3	86	6	55	62	148	289
Gulgong	Excluded*		Excluded*		1	19	24	24	9	23	66
Dunedoo~	2	20	1	9	2	16	1	2	2	9	56
Dubbo~	3	73	28	996	2	79	Excluded#		44	132	1,280
Wellington~	2	18	5	94	1	14	Excluded#		4	8	134
Totals	7	111	34	1,099	9	214	7	81	121	324	1,825

*Excluded to preserve MWR LGA's short-term accommodation supply to service tourist demand, noting there will be some use of these facilities by people visiting the site for up to a week (e.g., auditors, specialist consultants, company executives).

**Up to 31 rooms are available in private dwellings in the Gulgong-Mudgee area together with 24 rooms at a local camp-style accommodation site (as of 20 April 2023)

X Accommodation type not found in the area

Excluded due to time constraints but this should not preclude the use of this accommodation type where available

~Only to be used if accommodation within MWR LGA is not available

The accommodation survey was carried out between January and March 2023, along with a review of recent documents for renewable energy planning applications. Interview questions included:

- number of rooms available
- the average occupancy rates

- known peak periods throughout the year
- are they interested in providing accommodation for the project?

The survey identified 1,825 short-term accommodation rooms in the MWR, WS and DR LGAs. This is an underestimate as the search was not exhaustive, all hotel and motel rooms in the MWR LGA are excluded and some accommodation providers did not respond to contact efforts. The resulting accommodation list is provided in Appendix B.

The general outcomes of the phone interviews are summarised as follows:

- the general occupancy rate is around 80% Monday to Thursday with occupancy rates increasing at weekends and for public holidays and events
- some hosts stated they would give preference to existing loyal clients over new construction-related clientele
- some hosts were very supportive of the possibility of accommodating construction workers whilst others stated they would give preference to long-term loyal customers
- hosts advised when seeking accommodation to give as much prior notice as possible
- some hosts were amenable to longer-term stays (weeks rather than days) whilst others stated they would only provide accommodation from Monday to Thursday as they need capacity to serve the tourism trade at weekends
- some hosts were amenable to providing other benefits including the option of a hot evening meal and/or packed lunch and laundry services
- all hosts were generally positive regarding the potential business the Stubbo Solar project construction workers would bring to the region.

The confirmation of the occupancy rate finding supports MWRC's overall concern regarding demand for, and potential shortage of accommodation in the region exceeding supply (MWRC 2018b).

Research carried out by EMM Consulting during the Stubbo Solar EIS preparation (December 2020) states there are approximately 3,200 short-term rooms in the MWR LGA (EMM 2022a). The number of short-term beds will exceed this number as some rooms will contain more than one bed.

The proportion of the 1,825 rooms available at any point in time will be much lower due to the servicing of tourism, mining, renewable energy and agricultural industry sector accommodation needs.

Airbnb

Short-term rental accommodation is defined as a dwelling used by the host to provide accommodation in the dwelling on a commercial basis for a temporary or short-term period by the State Environmental Planning Policy (Affordable Rental Housing) Amendment (Short-term Rental Accommodation) 2021. These regulations were designed to support short-term rental accommodation as a home-sharing activity while putting protections and minimum standards in place for the safety of hosts and visitors.

Short-term rental accommodation (STRA) properties (such as houses, units and terraces, though not caravans, tents or moveable dwellings) should be included on the STRA Register. A registered STRA dwelling will have a STRA Property ID number (PID-STRA-XXXX) which is displayed on an online property listing. All hosts must comply with the fire and safety requirements and agree to follow the code of conduct before their registration is completed. The mandatory *Code of conduct for the short-term rental accommodation industry* applies to hosts, guests, letting agents, property managers and booking platforms (NSW Government 2021b).

A survey of accommodation available on Airbnb in the region was completed in March 2023. The outcome of the search, based on a month-long stay in July 2023 for an entire place, is summarised in Table 7.3. The timeframe was selected to mimic the longer accommodation requirements likely to be associated with the construction phase. Construction workers on a short-term contract (e.g., 1 month) may consider Airbnb accommodation as an option; early booking is recommended.

Table 7.3 Airbnb accommodation available in March 2023

Location	Number of homes	Total. No. rooms
Gulgong	6	17
Mudgee	118	407
Dunedoo	8	20
Wellington	4	8
Dubbo	45	169
Totals	181	621

The search found 181 properties available with a total of 621 rooms in the region that may be available to accommodate Stubbo Solar construction workers. Accommodation can be potentially sourced on websites like Airbnb, Stayz and booking.com. Hosts may be amenable to negotiation regarding rate discounts for longer-term stays. Though tourists also use Airbnbs as they are particularly convenient for family stays, around 10% of the available stock (approximately 18 properties depending on the number of bedrooms) will be required for a 4-month period (between March and June 2024) as shown in Table 7.1.

The Airbnb data suggests there is sufficient accommodation capacity to cater for the Stubbo Solar short-term housing requirements without impacting on accommodation to service prevailing tourism, industrial and agribusiness needs.

7.2.2 Longer-term accommodation availability

Managed properties

The rental vacancy rate is defined as the percentage of rentals in a defined area that are vacant. A vacancy rate of less than 3% indicates a tight rental market with a prevailing undersupply of rental properties. Rental markets with a rental vacancy rate of 3% are generally

considered to be well balanced between supply and demand (NSW Government 2021a). The vacancy rates for various localities in the MWR, WS and DR LGAs are shown in Table 7.4.

As shown in Table 7.4 occupancy rates indicate the rental market in most localities in the last six months are generally lower than the 3% benchmark indicating an undersupply of rental properties, with the exceptions of Mudgee in January and February 2023 and Wellington in February 2023. Real estate agents in the general locality suggest various factors are influencing the Mudgee, Gulgong and possibly Dunedoo housing market as follows (EMM 2022b):

- reduction in available rental stock as properties are purchased as holiday homes or transferred into the short-term stay market (i.e., Airbnb)
- demand generated by major projects occurring in or nearby the local area (i.e., the construction of Wellington Solar Farm and various inland rail projects)
- increased in-migration due to the COVID-19 pandemic and the corresponding increase in the attractiveness of regional NSW communities as permanent resident locations.

However, during the Employment Information Day in Gulgong on April 20 2023, ACEN and PCL were approached by two real estate agents who indicated they would be able to source up to 60 managed properties to accommodate the Stubbo Solar non-local workforce. Assuming three bedrooms per managed property, up to 159 non-local construction workers and 21 non-local PCL workers could be accommodated. This option will be used to accommodate non-local construction workers. Much of this proffered accommodation is new to the rental market, potentially increasing local rental stock and reducing competition for existing rentals. Stubbo Solar commits to the continued recruitment of new rentals to the local rental market.

Table 7.4 Managed property vacancy rates over the last six months

Locality	Rental vacancy rate (%)								
	Sep 22	Oct 22	Nov 22	Dec 22	Jan 23	Feb 23	Mar 23	Apr 23	May 23
Mudgee	2.2	2.2	2.8	3.2	3.4	4.2	4.4	5.2	4.7
Gulgong	1.8	0.7	0.4	2.9	2.9	2.5	0.7	1.5	1.8
Dunedoo	1.6	1.6	1.7	1.7	0.8	2.5	2.5	1.7	1.7
Dubbo	0.5	0.9	1.2	1.5	1.3	1.4	1.3	1.6	1.4
Wellington	2.2	2.2	2.0	2.7	2.4	3.6	3.2	2.2	3.1

Orange shading indicates tight rental market

Data source: https://sqmresearch.com.au/graph_vacancy.php

As of 8 April 2023, there were 316 managed properties available (102 in Mudgee, 6 in Gulgong, 3 in Dunedoo, 156 in Dubbo and 30 in Wellington). The rental markets suggest sufficient capacity to service this need without causing housing stress.

Median weekly rental costs are presented (where available) in Table 7.5. Weekly rents are generally higher in Mudgee and Gulgong.

Table 7.5 Median weekly rental costs in various localities as of March 2023

Locality	2-bedroom house	3-bedroom house	4-bedroom house	1 bedroom unit	2-bedroom unit	3-bedroom unit
Mudgee	\$403/wk	\$505/wk	\$600/wk	\$300/wk	\$390/wk	\$480/wk
Gulgong	Unavailable	\$420/wk	\$500/wk	Unavailable	Unavailable	Unavailable
Dubbo	\$350/wk	\$420/wk	\$520/wk	\$240/wk	\$320/wk	\$400/wk
Wellington	\$300/wk	\$350/wk	\$400/wk	Unavailable	\$240/wk	Unavailable

Data source: Realestate.com.au

Housing stress describes a situation where the cost of housing is high relative to household income. It occurs when households in the lower 40% of income distribution spend more than 30% of their income on rent payments or mortgage repayments. People in such situations are vulnerable to increases in housing costs which can be triggered by increased demand. A higher proportion of households in Mudgee and Gulgong experience rental stress (14.2% and 12.4% respectively) when compared to Dunedoo (6.9%), MWR LGA (10.2%), WS LGA (6.2%) and NSW (12.9%) (EMM 2022b).

The EPC Contractor may investigate the option of securing long-term managed property accommodation early in the project to house the non-local Stubbo Solar workforce. If this option is acceptable, it would be prudent to secure such accommodation prior to the commencement of Sections 2 and 3 of the construction works. Again, care would need to be taken to ensure any prevailing housing stress is not further exacerbated. This can be achieved through adding housing stress as an agenda item for the regular meetings with MWRC. If areas of housing stress are indicated, the EPC Contractor will focus on sourcing accommodation in other areas where housing stress is not indicated.

House-share

A search on Flatmates.com.au on 23 March 2023 yielded no rooms available in Gulgong, Kandos, Rylstone, Dunedoo, Coolah or Cassilis, however, the following listings were found:

- three listings for Mudgee (\$170-\$250/wk)
- one listing for Wellington (\$250/wk)
- 27 listings for Dubbo.

During an Employment Information Day held in Gulgong on 20 April 2023, 31 local private homeowners expressed an interest in letting a room to a non-local construction worker. Up to 31 workers could be accommodated by this option.

Unoccupied properties in the vicinity of Stubbo Solar

Unoccupied properties may present accommodation opportunities if the owners are agreeable to accommodating construction workers. This may have the potential benefit of increasing the local rental stock which could be used to service the local rental market when the construction of Stubbo Solar is complete. Owners of vacant properties are actively encouraged to express their interest in accommodating construction workers via the project website. There would be

a requirement for the owners of such properties to comply with local and state laws and regulations prior to entering the rental market.

7.3 Workforce accommodation assessment

A review of available accommodation services in the Mudgee (Mudgee and Gulgong), Dunedoo and Dubbo-Wellington localities within a 90-minute commute radius was conducted for this AES. The results can be found in Appendix B. The 90-minute travel radius was selected to comply with MWRC’s request to exclude short-term accommodation (hotels and motels) which is currently allocated to service the year-round local tourism industry. The capability of the remaining short-term and long-term accommodation stock to house Stubbo Solar non-local workers was assessed.

The recruitment of local and regional labour will be prioritised as part of the workforce planning process to reduce the pressure on temporary accommodation. The level of recruitment will be dependent on availability. Based on recent data, advice from MWRC and other AES documents (e.g., Umwelt 2022a), up to 88% of the construction workforce could be drawn from non-local sources, with the remainder sourced locally as required.

Figure 7.1 provides a chart view against time for the estimated non-local construction workforce (including Drive In Drive Out and Fly In Fly Out). The Wollar SF peak construction workforce period could be just ahead of that for Stubbo Solar project.

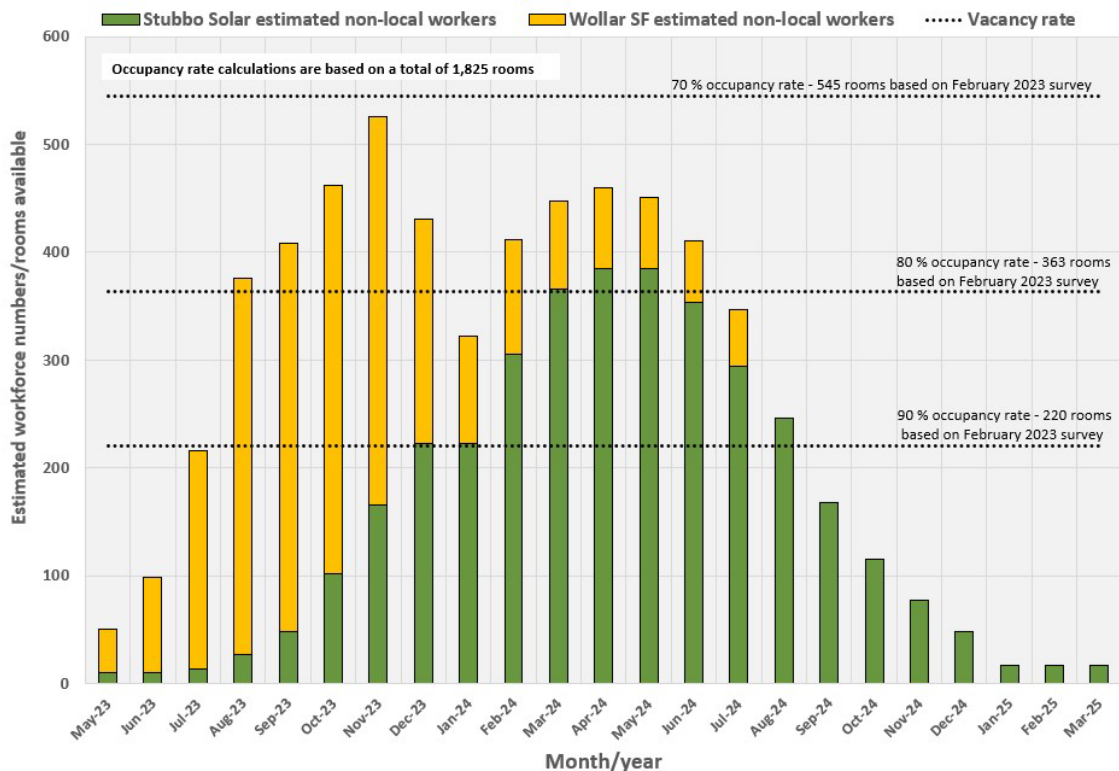


Figure 7.1 Comparison of cumulative workforce against short-term room availability

During the peak period of the Stubbo Solar project construction (November 2023 to August 2024), up to an estimated 363 workers will require local accommodation, this becomes a peak

of 419 workers requiring accommodation in March 2024 when taking Wollar SF worker accommodation requirements into account. Stubbo Solar project worker accommodation needs will begin to decline considerably when compared to previous demands from July 2024.

Table 7.6 shows the number of rooms potentially available based on various occupancy rates (fractional values are rounded down to the nearest whole number).

It is likely that current short-term accommodation demands (tourism, business, agribusiness, itinerant workers etc. accounting for current occupancy rates) combined with added competition from various large-scale construction projects (including Stubbo Solar and Wollar SF) will exceed the current supply in the MWR LGA region, but there is likely a ready supply of short-term accommodation options in the Dubbo-Wellington region with rooms also located in Dunedoo, Cassilis and Coolah.

Short-term accommodation would need to be reserved/procured well in advance to ensure construction workers are adequately housed. A recently issued report conducted on behalf of DR LGA by Delos Delta to assess worker short-term accommodation needs found a total of 55 venues (hotels, motels and cabins across the region with a combined total of 1,526 rooms and a capacity of 5,684 occupants (Delos Delta 2023). Stubbo Solar will make these reservations up to six weeks from the requirement as requested by MWRC (Appendix G) to reduce competition with tourism accommodation demands. MWRC indicated tourists tend to book accommodation well in advance of their need (e.g. eight weeks or more from the date of travel), but may to several months if booking for a particular event or special occasion.

Table 7.6 Occupancy rate scenarios for short-term accommodation

Location	No. rooms available*	Occupancy rate				
		50%	60%	70%	80%	90%
Mudgee	289	144	115	86	57	28
Gulgong	66	33	26	19	13	6
Dunedoo	56	28	22	16	11	5
Dubbo	1,280	640	512	384	256	128
Wellington	134	67	53	40	26	13
Total rooms	1,825	912	728	545	363	220

*Short-term accommodation rooms in the MWR, WS and DR LGAs (see Section 7.2.1).

Renewable energy projects including Uungala WF and Wellington North SF will likely seek accommodation in the dubbo and Wellington areas which, when combined with tourism accommodation needs, will reduce the available short-term accommodation stock potentially available for Stubbo Solar non-local workers (dependent on construction timing). Therefore, accommodation in the Dubbo and Wellington area would only be sought should there be insufficient accommodation to service the housing needs of Stubbo Solar non-local workers.

During the early and late construction phases (May to October 2023 and September 2024 to March 2025) non-local workforce numbers are around 45% or less than that of peak construction workforce numbers. The accommodation of the workforce can be catered for in

the MWR LGA without compromising tourism accommodation needs. During the period of peak construction where non-local workforce numbers approach 100% (384 workers), accommodation may need to be sought in other localities including Dubbo, Wellington, Dunedoo, Coolah and Cassilis as a last resort. Logistical issues are considered in Section 9.

Up to 363 rooms for non-local construction workers could be required at the peak of construction to accommodate the non-local workforce. The non-local management staff (up to 21 personnel) will be housed in rental accommodation. Table 7.6 shows there may be capacity to cater for these needs with an occupancy rate of up to 78%, which is comparable to the general short-term accommodation occupancy rate (around 80% or higher) identified in the accommodation survey (see Section 7.2.1). However, in accordance with MWRC requirements, non-local Stubbo Solar construction workers will not be accommodated in short-term accommodation within the LGA during the construction phase.

Note that Table 7.6 shows the number of rooms and not the number of beds available. Some of these rooms will have multiple beds and some of the cabins will have more than one bedroom, giving non-local workers the option to share accommodation and reduce their living costs. Given the likelihood of underestimating the available accommodation capacity, it is likely the Stubbo Solar non-local workforce can be adequately accommodated without impacting on tourism accommodation requirements.

It is assumed that each worker will occupy one room but there are short-term accommodation facilities which offer multiple beds per room providing the opportunity for more than one construction worker to occupy a room (dependent on their inclination to share and save costs). If some workers share rooms, this will reduce the number of rooms required.

The risk of overcrowding to reduce accommodation costs by some non-local temporary construction workers should be considered as a possible risk. However, it is an expectation that workers will not exceed the licence conditions of the accommodation provider in terms of the numbers of people accommodated. Quarterly accommodation update meetings will be held between ACEN, PCL, Transgrid and MWRC (see Section 12.3) and will include, as an agenda item, liaison with other solar/mining projects regarding their activities and accommodation implications.

Potential cumulative impact

It is possible that the construction phases of Stubbo Solar and Wollar Solar Farm may overlap in full or in part, dependent on the timing of project phasing which is subject to variation. An assessment of the likely overlap and the potential flow-on impact on the housing of non-local workforces in short-term accommodation has been conducted. The assessment is based on timing and workforce numbers provided by Stubbo Solar's EPC contractor (minus the estimated number of workers likely to seek longer-term accommodation) and the Wollar Solar Farm AES (Umwelt 2022a) as presented in Figure 7.1.

This scenario assumes that all Wollar SF non-local workers will be accommodated in short-term accommodation. However, The Wollar AES suggests up to 5 rental properties should be leased to accommodate some of the workforce. At occupancy rates of up to 72%, short-term accommodation availability, the accommodation needs of both Stubbo Solar and Wollar SF can be met by short-term accommodation. However, if occupancy rates increase beyond 72%, the

combined workforce accommodation needs are unlikely to be fully met by the short-term accommodation sector. This indicates accommodation alternatives should be sought by both projects and acquired to ensure the combined workforce short-term accommodation needs are addressed. However, given that some of the Wollar SF workforce will be accommodated in long-term housing, and that the assessment of the number of short-term rooms available has been underestimated, it is possible the combined workforce accommodation needs of both projects will be met. However, Stubbo Solar is seeking alternative forms of accommodation as shown in Table 7.1, for example, some workers will be accommodated in long-term accommodation following expressions of interest for the provision of accommodation received during events such as the Employment Information Day held in Gulgong on 20 April 2023 and the Stubbo Solar webpage.

7.3.1 Longer-term accommodation

It is likely that some members of the Stubbo Solar non-local workforce will be contracted to work for longer-term periods. It is unlikely that the use of short-term accommodation would be affordable over the duration of these contracts. It is likely that such workers would prefer to be housed in longer-term accommodation such as house rentals, Airbnbs (in some instances, a reduced weekly rate is offered for longer stays) or a house-share arrangement.

An estimated 21 beds will be required as long-term accommodation (based on all non-local EPC staff). The review of longer-term rentals in Section 7.2.2 indicates there is sufficient accommodation of this type available to service Stubbo Solar's workforce housing needs, as shown in Tables 7.1, 7.2 and 7.4.

7.4 Conclusion

The implementation of the indicative accommodation targets in Table 7.1 together with the strategies proposed in Table 11.1 by PCL and Transgrid will help minimise the impact of construction workers on short-term and long-term accommodation stock which may have otherwise been used to service tourism needs not only in MWR LGA but also in WS LGA and DR LGA.

8 Employment strategy

ACEN, PCL and Transgrid employment and procurement strategies are devised to generate positive social outcomes together with the efficient delivery of goods, services and works. Wherever possible, workers and businesses from the local and regional area will be prioritised for employment and contracting opportunities with the project to help maximise the benefits for local communities. To facilitate this, ACEN and PCL provide opportunities for local businesses to register their interest in providing goods and services to the project.

The consultation already undertaken with MWRC and available ABS 2021 Census data shows that overall unemployment is low in the area (1.8% in MWR LGA as of December 2022, as described in Section 4.4). MWRC has indicated there is a shortage of skilled workers within the LGA and it may be a challenge to meet aspirational local worker targets. Nevertheless, PCL proposes to implement the strategies listed in Table 11.1 in Section 11 and as described below to prioritise the employment of local workers for the construction and operation of the Stubbo Solar project.

8.1.1 Long Term Energy Service Agreement

ACEN was awarded two of four 20-year Long-Term Energy Service Agreements (LTESAs) by AEMO Services on 1 May 2023. LTESAs are offered through a competitive tender process. Various factors are assessed including social licence commitments (e.g. initiatives contributing to the broader community and economic benefits for host regions). One of these LTESAs has been awarded to Stubbo Solar.

The LTSEA offers the rights to access a minimum fixed electricity price and thereby reduce the long-term risk of exposure to low wholesale prices. It enables and requires ACEN to make significant financial commitments to support community initiatives, regional manufacturing and employment, and indigenous participation.

8.1.2 Industry Capability Network portal

The Industry Capability Network (ICN) is an independent network of experienced industry procurement and supply chain specialists who introduce businesses large and small to projects large and small across Australia and New Zealand. The ICN enables strong local industry participation, informing small to medium enterprises (SMEs) of domestic opportunities.

ACEN has utilised ICN services via a portal (which can be accessed at <https://gateway.icn.org.au/project/6307/stubbo-solar-farm>) to access local providers of goods and services relevant for the construction of a utility scale renewable energy project. Various work packages are on offer including combiner box supply, electrical installation package, meteorological stations, operations and maintenance building and security services; closed packages include cable supply, landscaping, civil (earthworks and clearing and grubbing), roadworks and mechanical installation.

As of 18 May 2023, 188 companies had registered through the Stubbo Solar ICN Gateway.

8.1.3 Employment information sessions

Various Stubbo Solar employment information sessions have been held to date, with the most recent event being held in Gulgong on 20 May 2023. There were approximately 100 attendees, with 44 companies expressing an interest in providing goods and/or services.

Stubbo Solar also uses these events to inform attendees not only about the project, but to also provide guidance on the ICN gateway, including the registration process and its use.

Businesses and individuals can also provide expressions of interest in the project through the project website using the employment and contracting opportunities web page (<https://stubbosolarfarm.com.au/employment-and-contracting-opportunities/>).

8.1.4 Industry and Aboriginal Participation Plan

The draft *Industry and Aboriginal Participation Plan Stubbo Solar* (ACEN 2021) has been prepared to demonstrate ACEN's commitment to providing meaningful opportunities for social participation in its projects and is provided as Appendix H. The document outlines the following:

- local supply chain development and environmentally sustainable procurement
- employment and workforce development
- First Nations participation.

The document provides key procurement and employment activities and targets together with performance tracking measures. In addition, the document provides the following as appendices:

- ACEN Australia's Social Participation and Communications Policy
- ACEN Australia business values
- ACEN Australia Diversity and Inclusion Statement.

8.1.5 Employment strategy actions

Employment processes, procurement processes and purchasing power will be used to generate positive social outcomes will be implemented for the Stubbo Solar project. These actions are summarised in Table 8.1.

Table 8.1 Employment and procurement actions

Action	Responsible
Unbundling of large work packages to match local market capability (refer to the Stubbo Solar ICN portal).	PCL
Provision for tender evaluation criteria and weightings that prioritise (where experience and capability are comparable) local business participation as part of the procurement selection process.	PCL

Action	Responsible
Advertise and market widely to ensure local suppliers have visibility over opportunities (e.g., employment information days, ICN portal, Gulgong/Mudgee local papers, Gulgong project office and the Stubbo Solar website).	PCL
An online registration portal has been established for local businesses to register their interest (Stubbo Solar ICN portal and project website).	PCL
Hosting supplier forums during the procurement phase to encourage participation. Forums to include information such as expected tender release dates, guidance on how to submit tenders, overview of key evaluation criteria, minimum pre-qualification standards (e.g. events in Gulgong on 20 April 2023 and 26 July 2023).	PCL
Provisions to provide feedback to local businesses who submit unsuccessful tenders outlining why they were unsuccessful and suggesting improvements for future tenders – thereby providing information and opportunity for development of capability and long-term participation.	PCL
Engagement and partnerships with government and industry providers to promote local business capability development, such as the ICN Gateway and commitments under the LTESA.	PCL/ACEN
Selection criteria and weightings embedded into recruitment and employment processes to prioritise local employment at or above 10%.	PCL
Targeted local recruitment campaigns, such as the procurement phase supplier forums, promotion of recruitment opportunities in local papers, via local business networks, and in online community interest groups (e.g. Facebook groups).	PCL/ACEN
Job readiness program with local employment agencies to identify suitable candidates and receive applications for advertised roles.	PCL
Work experience programs for secondary education students.	PCL
Targeted apprenticeships and traineeships for locals.	PCL
Presentations at local schools and TAFE colleges aimed at awareness, education and generating interest for students to pursue a career in renewable energy.	PCL and ACEN

8.2 Project employment profile

The Stubbo Solar project will generate up to 520 direct full-time equivalent (FTE) jobs during construction and 10 FTE jobs during the operation and maintenance phase (envisaged to be approximately 30 years). Employment benefits may extend through to local supply chains for goods and service including workforce supplies.

A breakdown of the required Stubbo Solar construction workforce by industry/employment type and specialist skills required is shown in Table 8.2.

Table 8.2 Workforce categories required for the construction phase

Workforce category	No. personnel
Project Managers	10
Construction Managers	16
Civil Engineers	5
Civil Supervisors	6
Civil Leading Hands	4
Civil Construction Workers level 1-3	20
Mechanical Engineers	5
Mechanical Superintendent	4
Mechanical Supervisors	10
Mechanical Leading Hands	6
Mechanical Construction Workers level 1-3	15
Electrical Engineers	5
Electrical Superintendent	4
Electrical Supervisors	10
Electrical Leading Hands	10
Electrical Construction Workers level 1-3	40
Apprentices/trainees	20
Labourers	278
Quality Engineers	5
Quality Supervisors	12
HSE Manager	4
HSE Supervisor	3
HSE Advisor	3
Commissioning Manager	2
Commissioning Engineers	6
Administration staff	7

Workforce category	No. personnel
Security staff	3
Cleaning staff	6
Document controllers	1

8.3 Local employment profile

The ABS 2021 employment statistics for MWR LGA, DR LGA and WS LGA are presented in Section 4.4 and the combined LGA employment by sector data is provided in Table 8.3. There is a good base of qualified workers with a combined total of 3,433 people employed in construction, 5,674 people employed as technicians and trades workers, 4,309 people employed as labourers and 3,146 workers employed as machinery operators and drivers across the three LGAs. However, skill shortages have been confirmed in DR LGA (Umwelt 2022b) and in MWR LGA (personal communication and MWRC 2018) and is discussed further in Section 8.4.

8.4 Local procurement

Opportunities for local businesses to supply goods and services during the construction process have been provided throughout the public consultation process and through an expression of interest webpage (<https://stubbosolar.com.au/community/>) and a dedicated portal on the ICN gateway. Fourteen packages of work have been advertised up to May 2023 with the opportunity for businesses or individuals to provide either full or partial scope expressions of interest for consideration in the procurement process. Local contractor information has been collected and collated for 188 businesses and passed on to the procurement team to follow up.

Contractors should demonstrate suitable experience and capability to undertake construction works in the vicinity of the Transgrid existing infrastructure. Discussions are ongoing with such identified persons/businesses and have been invited to submit a proposal. If a suitable agreement cannot be reached with a local company, or suitable services are not locally available, Stubbo Solar will seek these services from further afield (possibly beyond the MWR LGA boundary).

8.5 Procurement objectives and potential social outcomes

Stubbo Solar will contract suitably qualified and experienced individuals and businesses both locally and further afield (where required) to fulfill the needs and objectives of the development.

The key procurement and employment objectives involve implementing strategies which:

- ensure compliance with ACEN's Industry and Aboriginal Participation Plan Stubbo Solar (ACEN 2021)
- continue working closely with the Industry Capability Network and educating local individuals and business in using the ICN portal to apply for packages of work

Table 8.3 Employment by sector in MWR LGA, DR LGA and WS LGA in 2021

Occupation/Sector	Managers	Professionals	Technicians and Trades Workers	Community and Personal Services	Clerical and Admin Workers	Sales Workers	Machinery Operators and Drivers	Labourers	Total
Agriculture, Forestry and Fishing	1,846	67	215	8	116	48	90	522	2,945
Mining	138	172	651	5	105	3	1,075	87	2,256
Manufacturing	270	99	478	40	146	127	168	521	1,878
Electricity, Gas, Water and Waste Services	49	40	133	4	77	16	116	41	497
Construction	436	69	1,584	5	325	42	396	551	3,433
Wholesale Trade	139	75	126	0	143	224	141	77	926
Retail Trade	555	87	273	34	202	2,068	131	359	3,718
Accommodation and Food Services	522	15	360	743	110	338	47	720	2,870
Transport, Postal and Warehousing	126	25	42	14	280	52	715	59	1,326
Information Media and Telecommunications	29	79	52	0	36	47	3	4	256
Financial and Insurance Services	60	161	0	3	277	13	0	0	533
Rental, Hiring and Real Estate Services	51	37	18	3	98	223	6	12	460
Professional, Scientific and Technical Services	108	705	184	7	378	19	3	24	1,449
Administrative and Support Services	75	97	136	80	84	4	44	591	1,109
Public Administration and Safety	303	474	171	803	634	19	141	159	2,275
Education and Training	269	1,995	94	893	361	0	12	73	3,712
Health Care and Social Assistance	348	2,264	232	2,429	810	27	36	288	6,470
Arts and Recreation Services	61	75	141	93	55	21	0	93	536
Other Services	92	86	784	196	164	31	22	128	1,517
Totals	5,477	6,662	5,674	5,360	4,401	3,322	3,146	4,309	38,666

Source: ABS Community Profiles 2021 for MWR LGA, DR LGA and WS LGA

- involve engaging with relevant stakeholders (such as Mid-Western Regional Council, Business Mudgee, Mudgee Region Business, Gulgong Chamber of Commerce and Rylstone Kandos Business Chamber) prior to construction, and on an 'as needed' basis during the construction stage of the Project, communicating the timing of upcoming construction activities, providing local businesses with advanced notice of resource needs and allowing the businesses to plan for material needs and peaks and troughs in demand
- ensure regional residents are made aware of employment opportunities and lead contractors are encouraged to hire regional residents where they have the required skills and experience and can demonstrate a cultural fit with the organisation through mechanisms including the project site webpage and events including employment information days, with a dedicated expression of interest page on the project website (<https://stubbosolarfarm.com.au/employment-and-contracting-opportunities/>)
- prioritise the procurement of goods and services from regional and Indigenous businesses, and social enterprises
- provide workforce participation opportunities for regional, Indigenous and minority groups through employment and training streams, supporting the development of a skilled local workforce with sustainable career paths in the renewable energy sector
- participation in business group meetings, events or programs in the regional community designed to make regional businesses aware of upcoming contracting opportunities and requirements
- encouraging lead contractors to purchase local non-labour inputs to production, where local producers can be cost and quality competitive, to support local industries
- ensure communities are fully informed in a timely manner regarding contractor and procurement opportunities associated with the Project
- explore and create workforce participation opportunities for underrepresented communities (including women, Aboriginal and Torres Strait Islander peoples, people with a disability, long-term unemployed and young people) through employment and training streams to support the development of a skilled labour force; targets include:
 - A target of at least 15% of the workforce will be comprised of underrepresented groups
 - at least 1.5% of the FTE workforce will be comprised of Aboriginal people and/or Torres Strait Islanders
 - at least 1.5% of the contract value will be applied to the cost of education, training or capacity building for Aboriginal staff or businesses directly contribution to the contract
 - at least 1.5% of the contract value will be subcontracted to Aboriginal-owned businesses
 - ACEN is currently working with the project's eight Registered Aboriginal Parties. Mudgee Local Aboriginal Land Council, Central West Orana REZ First Nations Working Group, NSW Indigenous Chamber of Commerce, Supply Nation and Aboriginal Employment Services

- source a minimum of 10% of the construction workforce locally (approximately 52 people) where practicable
- source a minimum 10% of sub-contractors and suppliers locally (more if local goods and services markets allow)
- employ 100% locally sourced people and contractors for the operational phase of the project where practicable
- create training and skills development opportunities for the region to address potential skills gaps in the growing renewable energy industry, supporting the development of a skilled local workforce with sustainable career paths in the renewable energy sector. For instance, up to 20% of the project workforce will be learning workers and up to 20% of the workforce will be apprentices where practicable (ACEN 2021), and support supply chain development by prioritising the procurement of goods from Australian and New Zealand suppliers, the procurement of environmentally sustainable goods and services and invest in innovation.

8.6 Potential skill shortage issues

The following risks have been identified in relation to the achievement (or exceedance) of baseline targets based on ACEN Australia's knowledge base and experience.

- current capacity and capability of skilled local workforce to participate
- projected demand for local skilled workforce to participate in a growing renewable energy industry in the Central West Orana REZ
- socio-economic profiles of regional communities.

The *Mid-Western Regional Council Region Economic Development Strategy (2018-2022)* and the 2023 update both identified skill and labour shortage issues (NSW Government, 2023c). Recent discussions with Mid-Western Regional Council have confirmed shortages of workers with certain skills in the region. These include electricians, construction workers and machinery operators. At the time of the conversation, MWRC confirmed both the council and local mining companies were seeking several electricians and were having difficulty filling these roles. The reasons for this may be more complex than a shortage of suitably qualified workers as the council identified that the sourcing of local housing can be problematic, together with the provision of support services including health and childcare.

Given the number of renewable energy construction projects planned for the area, with the works envisioned to span several years, the local Mudgee TAFE is well placed to train people in various relevant skills including surveying, civil design, industrial electronics and control, construction, heavy machinery operation, electrical fitting including battery storage systems, industrial electronics and control, electricity network infrastructure and engineering. ACEN has initiated discussions with the TAFE regarding Stubbo Solar and PCL will also engage with TAFE to identify potential opportunities for training and collaboration.

Actions and mitigation strategies

The actions outlined in Section 11.1, Table 11.1 are proposed to prioritise and support local employment and procurement for the planning and construction phases of Stubbo Solar.

9 Workforce transport impacts

This section discusses the potential impacts of workforce commuter traffic on local road networks and presents mitigation options to address these impacts.

9.1 Acceptable travel time to the Project site

As outlined in the Traffic Management Plan, vehicles will enter the site via the access to Blue Springs Road which connects with the regional road network via Cope Road to the south. All vehicles will travel along Cope Road through Gulgong to the southwest or Ulan to the east.

A transport radius equivalent to a 90-minute travel time by car or bus has been adopted for this study. Travel times by motor vehicle to the Stubbo Solar site entrance on Blue Springs Road from various start locations were estimated using Google Maps; the locations assessed and the travel time outcomes are shown in Table 9.1.

Table 9.1 Car travel times and distances to Stubbo Solar

Start point location	Travel time (approx.)	Distance (km)
Cassilis	56 minutes	59
Coolah	62 minutes	87
Dubbo	88minutes	128
Dunedoo	46 minutes	58
Frog Rock	32 minutes	41
Geurie	82 minutes	103
Gulgong	16 minutes	14
Kandos	74 minutes	105
Mudgee	34 minutes	43
Rylstone	68 minutes	100
Wollar	35 minutes	47
Ulan Village	20 minutes	19
Wellington	65 minutes	88

For the purposes of this study, a 90-minute commute is considered a reasonable travel time to and from the site for the workforce. For some individuals, the acceptable daily travel time may vary (either greater or less than 90 minutes). The townships of Cassilis, Coolah, Dunedoo, Gulgong, Mudgee, Wellington and Wollar are within a one-hour commute of the Project site. Commutes to the Stubbo Solar site from Dubbo, Geurie, Kandos and Rylstone exceed one hour.

EIS traffic section summary

The two-year construction phase of the solar project, with a site entry point on Blue Springs Road, is expected to generate the following peak daily construction traffic demand for the project:

- 60 heavy vehicles per day
- 230 light vehicles per day to transport staff to and from the site in their personal vehicles
- 20 over dimensional vehicles per day.

The vehicle movements would peak during twelve months of the approximately two-year construction phase, when most of the photovoltaic modules are being delivered to site and the peak workforce numbers are reached. On either side of this time period, the vehicle movements would be fewer than at the peak, as the level of activity onsite and the number of deliveries would be ramping up or down. During the daily AM and PM peak hours, it is anticipated that six heavy vehicles would enter and leave the site in each peak hour; with 230 cars entering the site in the AM peak hour and 230 cars leaving the site in the PM peak hour. This is a conservative assumption which assumes that no mini vans or shuttle buses would be used.

Most of the heavy vehicles would come from the Port of Newcastle, whilst light vehicles would come from Mudgee (90 per cent) and Gulgong (10 per cent). The assessment determined that the additional construction traffic would not trigger the requirement for any road or intersection treatments beyond the basic rural intersection required at the site access point on Blue Springs Road.

Once in operation, the project is forecast to generate about 10 vehicles to / from the project in each peak period, which is forecast to have minimal impact on the road network. The decommissioning phase would see lower traffic generation in relation to expected mechanical decommissioning processes and a reduced labour force compared to the construction phase.

9.2 Commuting workforce – potential issues

There are 200 to 250 parking spaces planned for the Stubbo Solar site for use by the construction workforce for personal vehicles, vans and buses.

It is likely the construction phase workforce traffic estimate in the Stubbo Solar EIS (230 light vehicles) (Ramboll 2020) is an underestimate as the peak construction workforce has increased to approximately 520 people since the document was drafted. It would be impractical for all staff to drive their personal vehicles to the site as it would create potential congestion at peak traffic times and there is likely insufficient designated parking onsite.

The workforce numbers will increase significantly (i.e., exceed 200 people) from November 2023, with numbers increasing through to March 2024 to a maximum workforce of 520 people in March 2024, and then decreasing to less than 200 in September 2024, as shown in Figure 9.1.

Figure 9.1 shows that up to and including October 2023 and then from September 2024, workforce numbers are expected to fall below 200 and there will likely be sufficient parking space for personal workforce vehicles. For the period between November 2023 and August

2024, it is likely that there will be insufficient parking space at the construction site if each worker drives their personal vehicles to the site. There are health and safety issues to consider including fatigue due to potentially long commutes to site if workers were to be accommodated in the Dubbo locality.

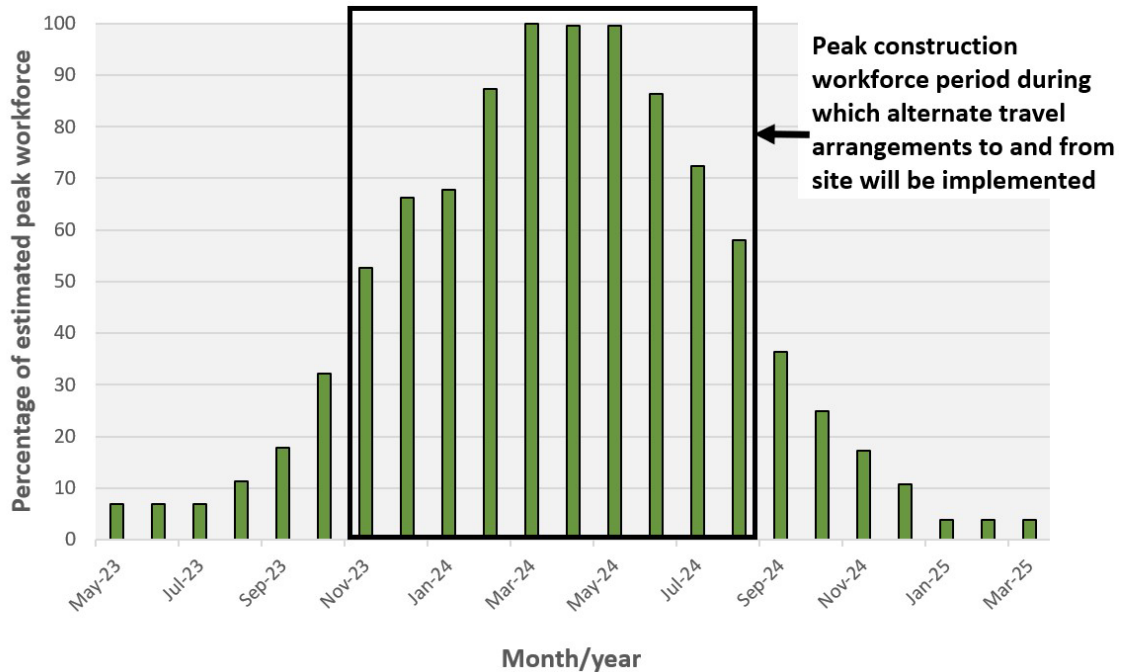


Figure 9.1 Percentage of peak workforce against time

Options to tackle this issue include:

- car share to take up to 4 workers per vehicle to and from the site
- minibuses or shuttle buses to take workforce to and from the site
- a combination of car share and minibuses/shuttle buses to take workforce to and from the site.

These options are discussed below.

9.2.1 Car share

This option would require considerable organisation and coordination and would rely on workforce willingness to participate. A list of workers willing or contractually obliged to car share would need to be created and regularly updated together with a list of workers' accommodation.

Assuming all workers could and would participate in a car share scheme or a minibus/shuttle bus scheme, the maximum number commuting vehicles during the construction phase are shown in Figure 9.2. The impacts caused by leave, absence through sickness, vehicle maintenance needs or other unforeseen factors will need to be a consideration. A car share scheme may not be practical in some circumstances as workers may require their own tools or equipment for use on site.

A car share scheme would reduce the number of workforce vehicles at the construction and help to reduce vehicle congestion on local roads. It would also enable workers to share travel costs and thereby reduce their overall travel expenses. The vehicle reduction scenarios shown in Figure 9.2 are likely aspirational as it is unlikely there will be 100% participation from the workforce.

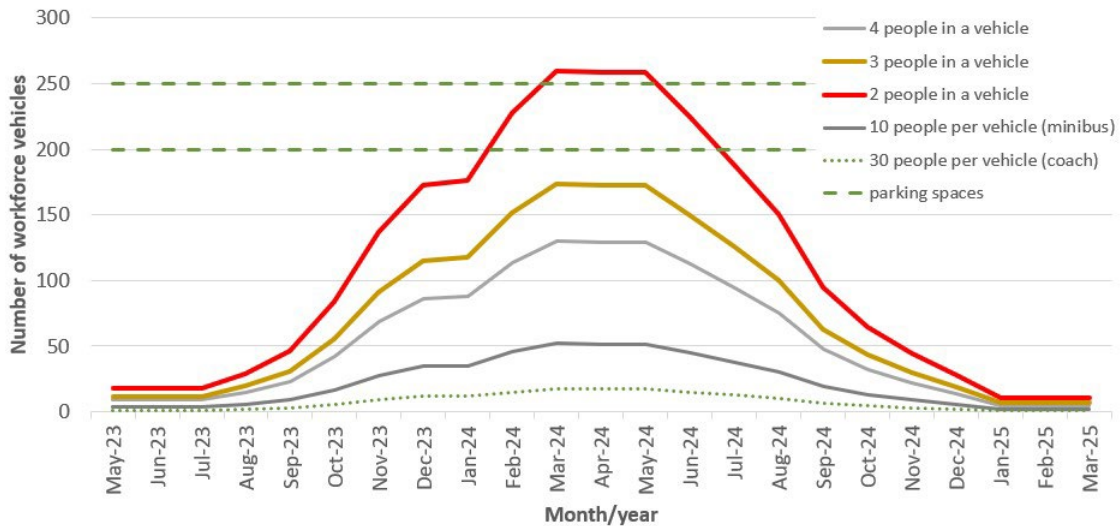


Figure 9.2 Impacts of car sharing on site workforce vehicle numbers

A car share scheme would require continual administrative resources in management and implementation (including troubleshooting). There may be a need to include a car share scheme module in the workforce induction process. Unless such a scheme is made compulsory (perhaps through contractual requirements), it is entirely reliant upon the good will and cooperation of the workforce.

9.2.2 Minibus/shuttle bus transport

It is likely most of the workforce (approximately 70% or 364 workers) will be accommodated in the DR LGA with a smaller proportion on the Gulgong-Mudgee area (approximately 25% or 130 workers) and the remainder of the workforce (approximately 5% or 26 workers) accommodated in the Dunedoo, Cassilis and Coolah localities. It may be practicable to procure minibus or shuttle bus services to transport workers to and from the site. Figure 9.2 shows that at peak construction periods, the number of vehicles required to transport the workforce is greatly reduced when minibuses and shuttle buses are used. The use of such vehicles would also reduce the number of workforce-related light vehicles on local roads.

A preliminary internet survey of minibus and shuttle bus hire services showed there to be at least five local service providers with a vehicle fleet ranging from 14-seat to 50+-seat vehicles and are either self-drive or supplied with a driver. Passenger transport vehicle services will be included in the procurement process.

The provision of such a scheme would require that participants be picked up and dropped off from their accommodation. Given the location and distribution of available accommodation, it

is likely the workforce will live in the Mid-Western Regional Council area. It is possible some construction workers may live in and around Dubbo Regional and Warrumbungle Shire LGAs; however, with the indicative accommodation shown in Table 7.1, this scenario is considered unlikely. Some of the workforce may be accommodated more remotely making it impractical to use minibus or shuttle bus services as none are locally available.

The number of minibuses or shuttle buses likely to be required to cater for the entire workforce is shown in Table 9.2. Note it may be impractical for all workers to use bus services as they may need to transport their own tools and equipment for use on site.

Table 9.2 Estimate of minibus and shuttle bus numbers to transport Stubbo Solar workforce

Date	Workforce size (local and non-local personnel)	Number of either minibuses <u>OR</u> shuttle buses required to transport the entire workforce to and from the project site	
		Minibus ¹	Shuttle bus ²
May 2023	36	3	1
June 2023	36	3	1
July 2023	35	3	1
August 2023	58	5	2
September 2023	92	8	3
October 2023	167	14	6
November 2023	274	23	9
December 2023	345	29	12
January 2024	352	29	12
February 2024	454	38	15
March 2024	520	43	17
April 2024	518	43	17
May 2024	518	43	17
June 2024	449	37	15
July 2024	377	31	13
August 2024	302	25	10
September 2024	189	16	6
October 2024	129	11	4
November 2024	89	7	3
December 2024	56	5	2
January 2025	20	2	1

Date	Workforce size (local and non-local personnel)	Number of either minibuses <u>OR</u> shuttle buses required to transport the entire workforce to and from the project site	
		Minibus ¹	Shuttle bus ²
February 2025	20	2	1
March 2025	20	2	1

¹Based on 12 seats per minibus; ²Based on 30 seats per coach

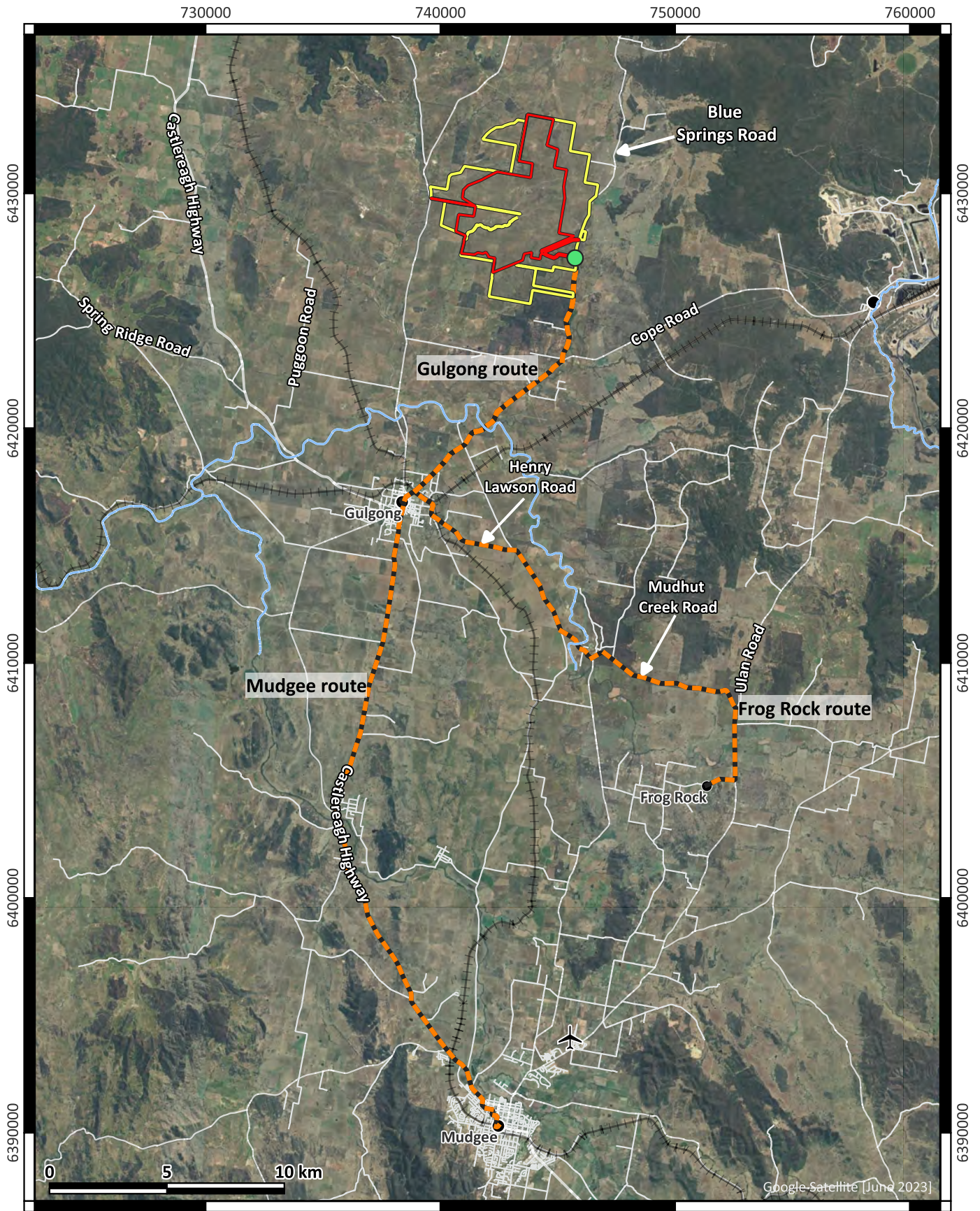
As per the car share scheme, the provision of minibuses and/or coaches would require continual administrative resources in management and implementation (including troubleshooting). Scheme costs would be recouped from users. MWRC has indicated there are no park and ride venues available in the LGA (Appendix A) so construction workers will be picked up from their accommodation. Possible routes are shown in Figure 9.3.

Though it is not yet possible to determine the bus routes through towns as it is not known exactly where the Stubbo SF workers reside, the large-scale routes are proposed as follows:

- **Mudgee:**
 - Pick up workers from Mudgee accommodation (route pending)
 - Castlereagh Highway to Gulgong
 - Pick up workers from Gulgong accommodation (if practical)
 - Cope Road → Blue Springs Road → Site
- **Gulgong:**
 - Pick up workers from Gulgong accommodation (route pending)
 - Cope Road → Blue Springs Road → Site
- **Frog Rock:**
 - Pick up workers from private accommodation,
 - Frog Rock Road → Mudhut Creek Road → Henry Lawson Road → Gulgong → Cope Road → Blue Springs Road → Site

The following routes would be considered should there be the need to accommodate workers in Wellington or Dubbo (though this likelihood is unlikely):

- **Wellington** (not shown in Figure 9.3):
 - Pick up workers from Wellington accommodation (route pending)
 - Mitchell Highway → Goolma Road → Gulgong
 - Pick up workers from Gulgong accommodation (if practical)
 - Cope Road → Blue Springs Road → Site
- **Dubbo** (not shown on Figure 9.3):
 - Dunedoo Road → Golden Highway → Spring Ridge Road → Castlereagh Highway → Gulgong
 - Pick up workers from Gulgong accommodation (if practical)
 - Cope Road → Blue Springs Road → Site



- Site access point
- Road
- Railway
- Proposed routes to site
- Project lot boundary
- Project site



Accent 1129 Stubbo Solar project
Figure 9.3. Proposed transport routes

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 CRS: GDA 20 MGA 55
 Scale: 1:225,000 at A4
 Page size: A4
 Additional data: NSW RoadSegment



A ride-to-work scheme module will be included in the workforce induction process. Unless such as scheme is made compulsory (perhaps through contractual requirements), it is reliant upon the goodwill and cooperation of the workforce. Should workers be accommodated in the Dubbo Regional and Warrumbungle Shire LGAs, they would also be picked up from and dropped back to their accommodation by shuttle bus or coach.

It is likely a combination of car share and shuttle bus/coach commute schemes would be the optimal solution to address the multiple issues associated with the workforce using their personal vehicles to commute between the site and their accommodation. The scheme may not be necessary during the periods of May to the end of October 2023 and September 2024 to March 2025 due to lower worker numbers.

10 Workforce code of conduct

This section outlines a code of conduct for the Stubbo Solar workforce and is designed to align with MWRC's existing industry agreements. The code identifies standards of behaviour for all employees, particularly to avoid anti-social behaviour during peak construction. The code sets out construction sector expectations and workers' responsibilities regarding day-to-day work. Its foundations are based on integrity, respect, trust and accountability. It should be used in conjunction with existing PCL, TransGrid and sub-contractor codes of conduct.

10.1 Duties under the Work Health and Safety Act 2011

The Stubbo Solar workforce must comply with duties prescribed by the *Work Health and Safety Act 2011* (WHS Act). Specifically, workers must:

- take reasonable care for their own health and safety
- take reasonable care that their acts or omissions do not adversely affect the health and safety of other persons
- comply, so far as reasonably able, with any reasonable instruction that is given to ensure compliance with the WHS Act and any policies or procedures adopted by the company to ensure workplace health and safety
- cooperate with any reasonable policy or procedure of the company relating to workplace health or safety that has been notified to workers
- report accidents, incidents, near misses, to the general manager or such other staff member nominated by the general manager, and take part in any incident investigations
- so far as is reasonably practicable, consult, co-operate and coordinate with all others who have a duty under the WHS Act in relation to the same matter.

10.2 Stubbo Solar employee and contractor responsibilities

In addition to the requirements listed above, Stubbo Solar workforce members (i.e. employees and contractors of ACEN) shall:

- **Compliance:** All employees/contractors must operate in compliance with all applicable laws, regulations, and permits. This includes environmental regulations, labour laws, and workplace health and safety regulations.
- **Transparency:** All employees/contractors must be transparent in their operations and provide accurate and timely information to the council, the community, and other stakeholders. This includes disclosing any potential environmental or health risks.
- **Community Engagement:** All employees/contractors must engage with the community and other stakeholders in a meaningful and respectful manner.
- **Environmental Stewardship:** All employees/contractors must employ best practices to minimise the environmental impact of their operations. This includes effective management of waste, emissions, and water usage, as well as responsible land rehabilitation.

- **Responsible Employment Practices:** All employees/contractors must uphold fair and ethical employment practices, ensuring workers' rights are respected, and health and safety standards are met.
- **Behaviour of Employees and Contractors when in town centres:** All employees and contractors must act with integrity, professionalism, and respect towards others and when interacting with the broader community. All vehicles to be well-maintained and not leave excessive amounts of mud or dirt on the road. No high-visibility work wear is to be worn and no safety flags to be on vehicles unless it is absolutely necessary for safety reasons.
- **Health and Safety:** All employees/contractors must prioritise the health and safety of their employees, the community, and other stakeholders. They must implement measures to prevent accidents and respond promptly and effectively to any incidents that may occur. This includes responsible travel to and from sites and when in town centres.

All workers at Stubbo Solar (employees and contractors of ACEN) shall:

- treat everyone with respect, courtesy, fairness and honesty
- not harass, bully or unlawfully discriminate against others, or support others who unlawfully discriminate, bully or harass others based on age, disability, race (including colour, national or ethnic origin or immigrant status), sex, pregnancy, marital or relationship status, family responsibilities or breastfeeding, sexual orientation, gender identity or intersex status or political, religious or other affiliation
- conduct their work in a safe manner as per company policy and guidance to ensure the safety of themselves and their co-workers
- report inappropriate conduct such as bullying, discrimination and harassment immediately
- uphold the values and good reputation of the employing organisation whether on- or off site
- only use their position and resources for proper intended use
- avoid conflicts of interest, report those that cannot be avoided and cooperate with their management.

The listed unwanted behaviours are defined for the purposes of this code as follows:

- harassment is considered by this code to be any form of behaviour towards a person that:
 - is not wanted by the person
 - offends, humiliates or intimidates the person and
 - creates a hostile environment
- bullying is considered by this code to be any form of behaviour towards a person that:
 - a person or group of people repeatedly behaves unreasonably towards another person or group of people
 - the behaviour creates a risk to health and safety and includes but is not limited to behaviours such as:
 - aggressive, threatening or intimidating conduct
 - belittling or humiliating comments

- spreading malicious rumours
- teasing, practical jokes or 'initiation ceremonies'
- exclusion from work-related events
- unreasonable work expectations (too much or too little work or work below a worker's skill level)
- displaying offensive material
- pressure to behave in an inappropriate manner.

Reasonable management action carried out in a reasonable manner does not constitute bullying behaviour for the purposes of this code. Examples of reasonable management action may include, but are not limited to:

- performance management processes
- disciplinary action for misconduct
- informing a worker about unsatisfactory work performance or inappropriate work behaviour
- directing a worker to perform duties in keeping with their job
- maintaining reasonable workplace goals and standards
- legitimately exercising a regulatory function
- legitimately implementing a company policy or administrative processes.

10.3 Stubbo Solar management responsibilities

In addition to complying with the requirements in Sections 10.1 and 10.2, workplace management must:

- model PCL's and Transgrid's values and professional conduct
- provide ongoing support and feedback to employees under their supervision
- provide employees under their supervision with information about available support services and resources
- communicate the responsibilities under the Code to employees under their supervision
- utilise reporting systems when a breach of the Code may have occurred
- promptly address poor conduct and performance.

11 Strategies

The strategies to be implemented for managing workforce accommodation, employment and other associated project impacts are set out below.

11.1 Accommodation, employment and procurement strategies

The actions described in Table 11.1 are proposed to support local and prioritise accommodation providers, businesses and local employment and minimise any negative impacts such as a reduction in tourist accommodation availability, during the planning and construction phases of Stubbo Solar.

ACEN has collated EOIs from local contractors, suppliers and individuals. These EOIs will be utilised by PCL and their engaged subcontractors to assist in engaging local personnel.

Table 11.1 Stubbo Solar accommodation strategies during construction

ID	Matter	Mitigation measure	Action	Responsible party	When	Compliance record
AES 01	Accommodation strategy required	Prepare accommodation strategy as required by Schedule 3 Condition 33 of the development consent.	Draft AES in consultation with MWR LGA.	Principal (ACEN) and EPC contractor (PCL)	Prior to construction	This AES and evidence of consultation with MWRC
AES 02	Implement AES and update as required	Implement approved AES throughout project.	Review and update AES as stated in Sections 1.7 and 12.	Principal, EPC Contractor, Site Administrator, Construction Personnel	Prior to and during construction	Compliance measures include but are not limited to: <ul style="list-style-type: none"> • this AES • evidence showing the attainment of accommodation and employment targets • zero accommodation and employment-related complaints in the complaints and grievances register
AES 03	Accommodation	Full-time EPC site staff will secure long-term accommodation in the region.	Leasing of up to seven (included in the total of 88 rentals required) local furnished houses for up to 12 months (various locations are actively being considered in consultation with Gulgong/Mudgee	EPC Contractor full-time staff	Prior to construction	Lease records

ID	Matter	Mitigation measure	Action	Responsible party	When	Compliance record
		EPC team – short-term visits (up to approximately 1 week).	<p>real-estate agents); and/or making long-term arrangements with accommodation providers in the MWR LGA and short-term accommodation other than hotels and motels in the Mudgee/Gulgong area.</p> <p>Visiting EPC team members will endeavour to stay in Mudgee or Gulgong at the listed accommodation provided in Appendix B.</p>	EPC contractor – short-term visits	EPC short-term visits: some will be scheduled (e.g. audits) whilst others will be as needed and ad hoc	Register of worker and accommodation forecasts
AES 04	Accommodation	Housing of short-term recruited non-local contractors.	<p>At the earliest possible opportunity, PCL will provide subcontractors with the lists attached in Appendix B to facilitate advanced bookings six weeks or less prior to requirement.</p> <p>Securing non-local workforce accommodation will be a contract clause.</p> <p>Accommodation requirements include:</p> <ul style="list-style-type: none"> • rooms in private dwellings (31 as of May 2023 to date) • alternative private camp-style accommodation (24 rooms) • up to 18 beds in cabins 	EPC Contractor; recruited non-local workers, Admin personnel	Prior to and during construction	<p>Staff housing records</p> <p>Workforce contract</p> <p>STRA ID numbers provided and recorded where appropriate</p>

ID	Matter	Mitigation measure	Action	Responsible party	When	Compliance record
			<ul style="list-style-type: none"> up to 53 beds in Airbnb-style accommodation (up to 18 dwellings). 			
AES 05	Accommodation	Where practicable, lease rental properties on a yearly basis within the locality (mainly Mudgee and Gulgong) to cater for peak construction workforce.	<p>Lease furnished accommodation, up to 88 properties in the Mudgee and Gulgong areas in preparation for construction commencement.</p> <p>Furnish if appropriate. These properties would be used as shared accommodation for workers.</p> <p>Short-term housing to be compliant with State Environmental Planning Policy (Affordable Rental Housing) Amendment (Short-term Rental Accommodation) 2021 including STRA ID number where appropriate or other relevant legislation and regulations as appropriate.</p>	EPC contractor, Admin personnel	Prior to construction	Lease records
AES 06	Accommodation	Monitor pending accommodation requirements up to 6 weeks in advance together with key regional tourism events to identify and mitigate periods	<p>Establish and implement an ongoing monthly review process to monitor current and forecast pending workforce accommodation requirements.</p> <p>Monitoring of MWR LGA event calendar so that any changes or updates can be applied to accommodation forecasts.</p>	EPC Contractor, Admin personnel	Monthly reviews throughout the Project with quarterly reporting	<p>Staff housing records, workforce contracts, STRA ID numbers</p> <p>Monthly records and register of worker and accommodation forecasts</p> <p>MWR, DR and WS LGA event calendars</p>

ID	Matter	Mitigation measure	Action	Responsible party	When	Compliance record
		of potential conflict.	Meetings between ACEN, PCL, Transgrid and MWRC at which the accommodation metrics and forecasts are reviewed (first meeting scheduled for July 2023).	ACEN	Quarterly (commencing July 2023)	<p>Quarterly reports; recipients to include officials from ACEN, PCL and MWRC</p> <p>Stubbo Solar/MWRC meeting minutes</p> <p>Stubbo Solar/Wollar SF meeting minutes or notes</p> <p>Quarterly meeting minutes</p>
AES 07	Accommodation	Prioritise booking short-term accommodation (up to 6 weeks in advance) to reduce impacts on tourism in the region and liaise with accommodation providers to manage peak accommodation timing.	<p>Book short-term accommodation through priority arrangements with accommodation providers in Mudgee and Gulgong. Establish a monthly review process to monitor worker accommodation requirements throughout construction.</p> <p>Note – Dunedoo, Coolah, Cassilis, Dubbo and Wellington short-term accommodation to be considered as a last resort should there be</p>	EPC Contractor, Admin personnel	Monthly reviews throughout the Project	<p>Monthly records:</p> <ul style="list-style-type: none"> • Non-local staff accommodation forecasts • Forecasts of tourist accommodation requirements (sourced from MWRC) • Short-term accommodation booking records (including date booked and dates of stay)

ID	Matter	Mitigation measure	Action	Responsible party	When	Compliance record
		Collaborate with MWR LGA via their monthly accommodation meeting with providers.	insufficient accommodation in MWR LGA.			
AES 08	Accommodation	Manage internal human resources and hiring processes to encourage workers to share accommodation where practicable.	Establish and maintain a register of forecasted worker accommodation requirements and accommodation options to prioritise accommodation sharing or clustering. New hire onboarding project orientation will include accommodation sharing options and employee contact information to encourage employees to share.	EPC Contractor, Admin personnel	Throughout construction	Monthly records and register of worker and accommodation forecasts Onboarding procedure and records.
AES 09	Accommodation	Manage worker accommodation to ensure available tourism accommodation is maintained at sufficient levels to service the local tourism industry.	Establish and maintain a register of regional events for MWR LGA and the localities of Dubbo, Wellington, Dunedoo, Cassilis and Coolah to identify potential periods of conflict with the construction schedule and mitigate accordingly. Liaise with MWRC and accommodation providers regarding pending major events to	EPC Contractor, Admin personnel	Throughout construction	Monthly records and register of worker and accommodation forecasts Locality events calendar Records of communication with MWRC and accommodation providers

ID	Matter	Mitigation measure	Action	Responsible party	When	Compliance record
			<p>ensure sufficient accommodation is available for visitors.</p> <p>Hold quarterly accommodation update meetings between ACEN, PCL, Transgrid and MWRC (see Section 12.3) that include, as an agenda item, liaison with other solar/mining projects regarding their activities and accommodation implications.</p>			Minutes from quarterly accommodation update meetings
AES 10	Accommodation	Ensure all non-local workers are informed not to stay in hotels in the Gulgong-Mudgee area to fulfil MWRC requirements and ensure local short-term accommodation is available to service the tourist industry.	<p>At the earliest possible opportunity, PCL will inform non-local workers not to seek local (Gulgong-Mudgee area) hotel and motel accommodation (auditors, specialist consultants and company executives etc. are exempt from this requirement).</p> <p>Establish and maintain a register of forecasted worker accommodation requirements and accommodation options to prioritise accommodation sharing or clustering within remits agreed with MWRC.</p> <p>Maintain an annual events calendar to indicate peaks of tourist activity.</p>	EPC Contractor, Admin personnel	Throughout construction	<p>Monthly records and register of worker and accommodation forecasts</p> <p>Up to date events calendar</p> <p>Worker induction records</p>

ID	Matter	Mitigation measure	Action	Responsible party	When	Compliance record
AES 11	Traffic management	Reduce the risk of worker commute congestion by encouraging carpooling to the site where practicable.	Encourage construction personnel at induction and toolbox meetings to increase the vehicle occupancy of light vehicles and reduce the number of private vehicles travelling to and from the project. Require justification from any personnel seeking to use their own vehicle. Monitor the number of personnel using shuttle buses and light vehicles to access and leave the site. It will be the EPC Lead Construction Manager's responsibility to ensure that the correct staff travel by shuttle bus.	EPC Contractor, Admin personnel	Throughout construction	Induction procedure and records Record of shuttle bus exemptions. Light vehicle use records and shuttle bus schedule
AES 12	Accommodation, local procurement and local employment	Prioritise and select workers and subcontractors that can demonstrate a large proportion of workers live in the MWR LGA.	Ensure worker locality selection criterion with weighting scores is included in the recruitment and procurement processes to prioritise local workers/ subcontractors and goods.	EPC Contractor, Operational personnel	Throughout construction and the operational phase	Maintain a report on workers and subcontractors and include proportion of jobs filled by locals of MWR LGA and proportion of subcontractors appointed with businesses located in MWR LGA to be provided in quarterly reports: recipients to include officials from ACEN, PCL and MWRC
AES 13	Accommodation	Establish and maintain a	Establish a register of property owners with rooms or	EPC Contractor,	Monthly review of local	Rental Property Owner register

ID	Matter	Mitigation measure	Action	Responsible party	When	Compliance record
		register of local property owners who have expressed interest in offering dwellings or rooms for rent.	houses/dwellings to rent and maintain records of number of rooms and rates of rental costs.	Operational personnel	property availability during Stubbo Solar construction phase.	
AES 14	Health services	Reduce the risk of increased demand on local health services posed by construction workers.	<ol style="list-style-type: none"> 1. Include discussion during the recruitment process outlining the strain on local health services and the preference for employees to service medical needs through their home medical providers (e.g., via telehealth and online prescription services). 2. Include health services module in the induction process describing methods to reduce the risk of overwhelming local medical service and facilities. 3. Inclusion of a fully equipped and stocked first aid room at the construction site, including a defibrillator. 4. Provision of trained first aiders on site 	EPC Contractor - Health, Safety and Environment (HSE) Coordinator	Throughout construction	Induction records First aid room stock level records Defibrillator check and maintenance records First aider training records Health care services list

ID	Matter	Mitigation measure	Action	Responsible party	When	Compliance record
			5. Provision of local health care services list to workers.			
AES 15	Employment Strategy	Draft AES in accordance with Development consent conditions.	Draft AES in consultation with MWRC and DPE.	Principal (ACEN) and EPC contractor	Prior to construction	This AES and evidence of consultation with MWRC and DPE
AES 16	Employment Strategy	Implement approved AES and relevant updates throughout project.	Monitor, document and maintain recruitment records. Assess against employment targets.	Principal, EPC Contractor, Construction Personnel	Prior to construction	Personnel contracts Personnel induction records Records of employment assessment against relevant targets
AES 17	Local Employment	Maximise visibility of job opportunities.	Maximise employment and retention of local workers by: <ul style="list-style-type: none"> engaging local labour hire companies with a strong local presence and connection with local residents engaging with Mudgee Aboriginal Land Council and other local Indigenous organisations (e.g., Three Rivers Regional Assembly - https://trra.community/) to confirm key employment agencies / labour hire companies 	Principal and EPC contractor	Prior to and during construction	Communication records (emails, letters, records of phone calls) Employment, contracting and procurement session attendance registration Employment contracts indicating origin of employee (i.e., local or non-local)

ID	Matter	Mitigation measure	Action	Responsible party	When	Compliance record
			<ul style="list-style-type: none"> engaging with the specialist Indigenous employment agencies to understand the size of the potential Aboriginal and Torres Strait Islander labour pool and to identify strategies to secure participation. 			
AES 18	Local employment and skills development	Maximise local worker component of the site workforce.	<p>Targeted local recruitment campaigns.</p> <p>Initiatives to facilitate the transition from training to long term employment for participants.</p> <p>Funding for micro-credentialling programs that offer short-course training outcomes to meet regional skills shortages and provide pathways to longer term employment.</p> <p>Identify project positions where additional investment in training may result in increased local participation and engage with local training providers /businesses to encourage these organisations to supply the necessary training locally.</p> <p>Job readiness program with local employment agencies to identify</p>	Principal and EPC contractor	Prior to and during construction	<p>Recruitment campaign records</p> <p>Project employment records</p> <p>Funding records</p> <p>Program records, meeting records</p>

ID	Matter	Mitigation measure	Action	Responsible party	When	Compliance record
			suitable candidates and receive applications for advertised roles.			
AES 19	Local employment and skills development	Take action to address skill shortages in the area by targeting local schools.	Work experience programs for secondary education students. Funding for secondary level education scholarships and other education and employment pathways programs. Participation in industry forums and events aimed at generating interest for secondary students to pursue a career in renewable energy.	Principal and EPC contractor	Prior to, during construction and in operational phase	Work experience HR records Funding and project documentation Event registration and attendance records
AES 20	Local employment	Establish relationship with Mudgee TAFE to provide workforce training as required.	Establish ongoing dialogue with Mudgee TAFE regarding training opportunities to discuss skills gaps and to promote local employment and participation in the renewables industry.	EPC contractor	Throughout construction and the operational phase	Meeting records
AES 21	Local procurement	Ensure local suppliers and workforce have visibility over opportunities.	Hosting of supplier forums to provide information about upcoming tenders. Establish and maintain online registration portal for local businesses to register their interest.	Principal, EPC Contractor,	Prior to and during construction	Forum records Online register records

ID	Matter	Mitigation measure	Action	Responsible party	When	Compliance record
AES 22	Local procurement	Timely and meaningful supplier feedback.	Provisions to provide meaningful feedback to local businesses who submit unsuccessful tenders providing information and opportunity for development of capability and long-term participation.	Principal, EPC Contractor	Prior to and during construction	Procurement records
AES 23	Local procurement	Include selection criteria for sub-contractor selection process to prioritise the employment of at least 10% local contractors from the MWR LGA and beyond.	<p>Establish and implement contractor relevant selection criteria and weighting to prioritise locally sourced contractors and businesses.</p> <p>Review workforce requirements and sub-contractor requirements against forecast needs and AES targets every month.</p>	Principal and EPC contractor	Prior to and during construction	<p>Maintain monthly register of employees and sub-contractors to report on:</p> <ol style="list-style-type: none"> 1) proportion of jobs filled by residents of MWR LGA and Dubbo and Orana Region 2) proportion of sub-contractors appointed with businesses registered in the MWR LGA and Dubbo and Orana Region 3) proportion of subcontractors demonstrating Indigenous ownership or employment 4) proportion of jobs filled by underrepresented groups 5) proportion of jobs filled by Aboriginal people and/or Torres Strait Islanders

ID	Matter	Mitigation measure	Action	Responsible party	When	Compliance record
						<p>6) proportion of contract value applied to the cost of education, training or capacity building for Aboriginal staff or businesses directly contributing to the contract</p> <p>7) proportion of jobs filled by apprentices</p>
AES 24	Local procurement	Promote local business capability development.	<p>Engage and partner with government e.g., MWRC, Aboriginal employment services, local organisations and other community groups e.g., Birrang Enterprise Development Company, Mudgee Local Aboriginal Council, VERTCO, OTEC Mudgee Employment Service, to support regional modelling of business and workforce needs and communicate pending Project employment and procurement opportunities.</p> <p>Review workforce requirements and sub-contractor requirements</p>	Principal and EPC contractor	Prior to and during construction	<p>Project procurement records</p> <p>Workforce modelling documents</p> <p>MWRC preferred contractors list</p> <p>Documentation of engagement with local organisations and involvement in events or online communication about local employment and procurement opportunities</p>

ID	Matter	Mitigation measure	Action	Responsible party	When	Compliance record
			against forecast needs and AES targets every month.			
AES 25	Local procurement	Establish and maintain an EOI register for local goods and services providers, and individuals seeking employment with the project. Liaise with MWRC regarding the preferred contractors list.	<p>Advertise and market widely to ensure local suppliers are aware of opportunities.</p> <p>Establish online Expression of Interest (EOI) register before development commencement. Maintain and review responses throughout construction. Include proportion of EOIs resulting in local employment opportunities in monthly report.</p>	EPC Contractor, Operational personnel	Throughout construction and the operational phase	<p>ICN Gateway webpage</p> <p>Information days held in Gulgong together with attendance records</p> <p>Stubbo Solar EOI web page</p> <p>Local newspaper articles and notices</p> <p>Records of engagement with local business organisations (e.g., Mudgee Region Business and Gulgong Chamber of Commerce)</p> <p>Project procurement records indicating whether the goods and services are provided by local businesses (target is at least 10%)</p> <p>Records of assessment regarding 1.5% of the contract value being subcontracted to Aboriginal-owned businesses</p>
AES 26	Code of Conduct	Legal right to work and	Work with engaged subcontractors to ensure all workers are legally entitled to work in Australia and ensure any Temporary Visa	EPC Contractor	Construction and operational phase	<p>Employment contracts</p> <p>Induction records</p> <p>Visa records</p>

ID	Matter	Mitigation measure	Action	Responsible party	When	Compliance record
		Temporary Visa workers.	workers have their basic rights upheld.			

11.2 Strategies to minimise other impacts

Healthcare

MWRC provides health and wellbeing support to the community, including providing services in aged and disability care, and offering key medical and business facilities, and sporting and recreation facilities.

It is considered that the additional demand for health care due to the workforce could negatively impact the current services available. Mitigation measures include:

- The workforce induction process will include a thorough briefing via lecture and visual aids regarding the issue of limited local medical and health facilities. The briefing will include highlighting the possible cumulative stress that could be imposed on the local healthcare system and prescription services, and the negative impact this could have on residents. Workers will be informed that any perceived expectations regarding local medical and healthcare facilities must be managed with due consideration, and priority access given to locals.
- Promote the use of telehealth services with workers' designated GPs. This will be incorporated as a component of the induction process.
- Promote the use of online prescription services (e.g., InstantScripts and Doctors On Demand) or phone apps (e.g., DoctorAI). This can be presented as an option during the induction process.

On-site mitigation measures will include:

- Consideration of the temporary employment of a fully qualified medical professional such as a paramedic on an as needed basis for the construction phase of the project.
- Inclusion of a fully equipped and stocked first aid room at the construction site, including a defibrillator.
- Trained first aiders to manage any minor medical issues on site as required under First-aid-in-the-workplace 2020 and Managing-the-work-environment-and-facilities 2019 NSW, Safework Code of Practice. Training records will be kept ensuring designated first aiders attend relevant refresher courses to maintain qualifications.
- The public hospital system will be used to ensure compliance with the Work Health and Safety Act on occasions when a worker requires a higher level of medical assistance than can be provided by the site First Aiders.

A list of healthcare services in the local area is provided in Appendix D.

MWR LGA events

The MWRC hosts various annual events and activities within the LGA with many of these centred on the Mudgee region. PCL and Transgrid will consult with MWRC and local businesses to understand and limit the impact of the Stubbo Solar project on these activities. MWRC publishes a list of annual events on their website: (<https://www.midwestern.nsw.gov.au/Community/Events-directory>).

Consideration of the timing of events in the DR (events calendar located at <https://dubbo.com.au/events/calendar>) and WS (events calendar located at <https://www.warrumbungle.nsw.gov.au/tourism/events/event-calendar>) LGA events as some localities located within their boundaries are also suggested as potential sources of workforce accommodation.

An event list for all three LGAs is provided for 2023 and 2024 in Appendix C.

11.3 Cumulative impacts

It is expected that the contribution of the Stubbo Solar project to the cumulative impacts on accommodation and employment from broader development in the region can be managed effectively if:

- the measures for addressing accommodation, employment and other associated impacts outlined in Section 11.1 are implemented, and
- communication is maintained with MWRC and the proponents of developments in the region regarding cumulative impacts and their management, as set out in the Community Engagement Plan.

12 Monitoring and review

12.1 General review requirements

Review is a critical element of environmental management systems and involves a formal evaluation of the adequacy of the environmental management plans and documents – taking into account any new environmental issues, legislation, changing circumstances and continual improvement.

12.1.1 Review requirements under the DC

It is a requirement of the DC that the AES includes a program to monitor and review the effectiveness of the AES over the life of the development (CoC 33d, Schedule 3) and report any incidents (CoC7, Schedule 4).

In accordance with CoC 2, (Schedule 4), any strategy, plan or program required under the DC (such as this AES) will be reviewed to the satisfaction of the Secretary of DPE. Accordingly, the AES will be:

- updated prior to carrying out any upgrading or decommissioning activities on site
- reviewed and, if necessary, the strategies, plans or programs required under this consent revised to the satisfaction of the Secretary within 1 month of the:
 - submission of an incident report under CoC 7 (Schedule 4)
 - submission of an audit report under CoC 9 (Schedule 4) or
 - any modification to the conditions of this consent.

When revised, the revision status of this AES will be indicated on the title page of this document. This AES will be made publicly available on the project website in accordance with CoC 17 (Schedule 4) of the DC. A hard copy of the AES will also be kept at the site project office during construction.

PCL and Transgrid commit to complying with CoC 4 (Schedule 2) and will:

- comply with any requirement/s of the Secretary arising from the Department's assessment of:
 - a. any strategies, plans or correspondence that are submitted in accordance with this consent
 - b. any reports, reviews or audits commissioned by the Department regarding compliance with this consent; and
 - c. the implementation of any actions or measures contained in these documents.

12.1.2 Quarterly management review meetings

To ensure a rigorous, all-encompassing review process for strategies, plans or programs required under the DC (such as this AES), PCL and Transgrid will conduct quarterly management review meetings with ACEN.

These quarterly review meetings will be attended by individuals with either executive or specialist responsibility. At this stage of the development this may include:

- the ACEN Project Manager
- the ACEN HSE Advisor
- the PCL/Transgrid Project Manager
- the PCL/Transgrid HSE Manager
- the PCL/Transgrid Construction Manager
- the Transgrid Site Manager
- the subcontractor management representatives, as appropriate.

12.2 Review during construction

The AES will be reviewed and updated six-monthly during construction, commencing July 2023.

To facilitate the review process during construction, PCL and Transgrid will:

- conduct six-monthly reviews of the AES to assess the continuing suitability of the AES in relation to construction progress, workforce requirements, changing conditions and other projects in the area
- promptly report six-monthly review outcomes to MWRC, including current accommodation types utilised and projections of these on a quarterly basis – this continual engagement will allow Council to share important activities and dates that would impact worker / tourist accommodation availability and key issues for other SSD project accommodation strategies
- assess the extent to which the AES objectives are being met regarding:
 - mitigation of impacts on use of short-term accommodation by tourists in the MWR LGA
 - whether accommodation requirements for upcoming construction stages and staff levels using local accommodation options (Appendix B) are sufficient
 - prioritising local employment where reasonable and practicable, by monitoring the percentage of workforce that is locally sourced.
- incorporate feedback from external stakeholders regarding the AES and its implementation, including:
 - MWRC
 - accommodation operators
 - local coal mines and quarries
 - other nearby renewable energy projects, including Wollar SF, Dunedoo SF and Liverpool Range WF
 - the general community (including businesses).

The regular review of the AES will allow opportunities for improvement to be identified and implemented, achieving the overall aim of continual improvement.

To ensure the AES is effective during the implementation of activities, and adapts as required to new information, the following review actions will be undertaken alongside implementation activities:

- continued engagement with MWRC to discuss community and business concerns
- appoint and maintain a Liaison Officer/Consultation Manager for the project to implement activities and review this plan regularly
- keep an accurate and up-to-date record of all feedback from consultation activities and all correspondence with the community
- ensure that the Liaison Officer attends Business Mudgee monthly meetings during the Construction phase of the project
- provide this AES to all major subcontractors engaged by PCL and Transgrid (and any others, as deemed necessary)
- review Targets and Actions outlined in this report as part of the Project Audit Schedule
- include updates on compliance of this strategy into project monthly reports.

Should any modifications or adjustments be required to the strategy in the future, ACEN will communicate with Council promptly to inform them of the need for and nature of the proposed modifications/adjustments.

12.3 Monitoring during construction

To monitor the performance of the AES, current and forecast workforce accommodation requirements will be tracked monthly by the Lead Project Managers for PCL and Transgrid.

The actual breakdown of accommodation by location and type will be documented, compared to the measurable targets set out in this AES and reported to MWRC at the quarterly accommodation update meetings between ACEN, PCL, Transgrid and MWRC at which the accommodation metrics and forecasts are reviewed (see Table 11.1). The meetings will include, as an agenda item, liaison with other solar/mining projects regarding their activities and accommodation implications.

Where the actual breakdown is significantly different from the targets, this will be discussed in the quarterly meetings and consideration given to any need to adjust the accommodation strategy, or targets, or both.

Employment targets will be documented and reported six-monthly in the Australian Industry Participation reports prepared by the PCL Lead Project Manager.

12.4 Audit of the plan

Within three months of commencing construction, or as directed by the Secretary, ACEN is required to commission an Independent Environmental Audit of the development, including this AES. The audit will:

- be prepared in accordance with the relevant Independent Audit Post Approval requirements (DPE 2018)
- be led and conducted by a suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Secretary

- be carried out in consultation with the relevant agencies
- assess whether the development complies with the relevant requirements in this consent, and any strategy, plan or program required under this consent
- recommend appropriate measures or actions to improve the environmental performance of the development and any strategy, plan or program required under this consent
- assess the monitoring and effectiveness of this AES, specifically whether the strategies outlined in Section 11 have been implemented and maintained (or justifiably modified where needed).

The recommendations of the Independent Environmental Audit will be implemented to the satisfaction of the Secretary.

Within three months of commencing an Independent Environmental Audit, or unless otherwise agreed by the Secretary, a copy of the audit report will be submitted to the Secretary, and any other NSW agency that requests it, together with a response to any recommendations contained in the audit report, and a timetable for the implementation of the recommendations.

13 Strategy availability

ACEN commits to making plans (including the AES) publicly available on the project website and commits to ensuring the strategy is up to date. The project website is:

<https://stubbosolar.com.au/>

This project website will provide the following information:

- Environmental Impact Statement (EIS), Amendment Report and Response to Submissions
- the final layout plans for the development
- information about the approvals for the development
- Assessment report and development consent
- approved strategies, plans or programs required under the conditions of this consent
- the proposed plans for staging of the construction, operations or decommissioning of the development
- how to make complaints
- a register of previous complaints
- compliance reports
- results of any independent environmental audit, and the ACEN's response to the recommendations in those audits
- any other matter required by the Secretary of the NSW DPE.

This information will be kept up-to-date as relevant to the stage of the development, and as the progress progresses through the construction and into operation phases.

14 References

- ABS (2016a). Mid-Western Regional Council. Australian Bureau of Statistics 2016 Census Quickstats. Accessed 25 January at <https://www.abs.gov.au/census/find-census-data/quickstats/2016/LGA15270>.
- ABS (2016b). Tourism Accommodation, Australia latest release 2015-2016 financial year. Australian Bureau of Statistics website. Accessed 7 February 2023 at <https://www.abs.gov.au/statistics/industry/tourism-and-transport/tourist-accommodation-australia/2015-16>
- ABS (2018). Technical Paper Socio-Economic Indexes for Areas (SEIFA) 2016. ABS catalogue No. 2033.0.55.001. Australian Bureau of Statistics, 27 March 2018.
- ABS (2021a). Search Census data. Australian Bureau of Statistics 2021 Census Quickstats. Accessed 25 January at <https://www.abs.gov.au/census/find-census-data/search-by-area>.
- ABS (2021b). Estimating homelessness: Census. Accessed on 17 February 2023 at <https://www.abs.gov.au/statistics/people/housing/estimating-homelessness-census/2021>.
- ACEN (2021). Industry and Aboriginal Participation Plan Stubbo Solar (draft). ACEN Australia. December 2021.
- ACEN (2023). Stubbo Solar website. Accessed on 11 February 2023 at <https://stubbosolar.com.au/>
- Briggs, C., Rutovitz, j., Dominsh, E., Nagrath, K. (2020). Renewable Energy Jobs in Australia: Stage One. Prepared for the Clean Energy Council by UTS institute for Sustainable Futures. June 2020.
- Business NSW (2023). Business NSW Advocacy in Action: News webpage. Accessed 7 April 2023 at <https://www.businessnsw.com/media-centre/advocacy-in-action-news/nsw-tourism-towns-win-national-crowns>
- Corkery, R. W. (2020). Bowdens Silver Project Environmental Impact Statement. Prepared by R. W. Corkery and Co. Pty Limited for Tomingley Gold Operations Pty Limited. January 2022.
- CWP Renewables (2020). Environmental Impact Statement Uungala Wind Farm. May 2020.
- Delos Delta (2023). Research Report – Analysis of Short-Term Worker Accommodation Needs. Prepared for Dubbo Regional Council. March 2022. Accessed on 22 June 2023 at <https://www.dubbo.nsw.gov.au/ArticleDocuments/464/Research%20Report%20-%20Analysis%20of%20Short-Term%20Worker%20Accommodation%20Needs.PDF.aspx#:~:text=Current%20short%2Dterm%20accommodation%20options,a%20capacity%20of%205684%20occupants>.
- DPIE (2021a). Regional Housing Taskforce Findings Report, Summary of Stakeholder Engagement. NSW Department of Planning, Industry and Environment. September 2021
- DPIE (2021b). Housing 2041: NSW Housing Strategy. NSW Department of Planning, Industry and Environment. March 2021.
- DRC (2023). Destination Dubbo webpage. Dubbo Regional Council. Accessed 6 April 2023

Eco Logical (2020). Environmental Impact Statement Uungula Wind Farm. Prepared for CWP Renewables Pty Ltd on behalf of Uungula Wind Farm Pty Ltd. May 2020.

EMM (2022a). Memorandum regarding Stubbo Solar Farm Project – VPA Advice. May 2022.

EMM (2022b). Appendix O Social Impact Assessment for the Birriwa Solar and Battery Project. Drafted by EMM Consulting Pty Ltd for ACEN (Australia). July 2022.

EMM (2022c). Stubbo Project Social Risk Assessment. Drafted by EMM Consulting Pty Ltd for ACEN (Australia). 19 May 2022.

EMM (2022d). Bellambi Heights Renewable Project Scoping Report. Drafted by EMM Consulting Pty Ltd for Vena Energy (Australia). March 2022.

EnergyCo (2023). Central-West Orana Renewable Energy Zone – Coordination community impacts and benefits in the REZ. March 2023. Accessed online on 6 April 2023 at <https://www.energyco.nsw.gov.au/sites/default/files/2023-03/cwo-rez-report-research-impacts-benefits.pdf>.

InlandRail (2020). Environmental Impact Statement Chapter A8 Construction of the proposal – Narromine to Narrabri. December 2020.

InlandRail (2023). Narromine to Narrabri. Accessed 25 January 2023 at Narromine to Narrabri - Inland Rail (artc.com.au).

Lightsource bp (2023). Lightsource bp website. Accessed 6 April 2023 at <https://lightsourcebp.com/au/project/wellington-north-solar/>.

A. McClure (2023). IPC 17 February Anthony McClure Speech Final. Accessed 6 April 2023 at <https://www.ipcn.nsw.gov.au/resources/pac/media/files/pac/projects/2022/12/bowdens-silver/public-submission-rounds/applicant-presentations/ipc-17-february-anthony-mcclure-speech-final.pdf>.

MWRC (2018a). 2018 Economic and Business Profile for the Mid-Western Region. Mid-Western Regional Council. June 2018.

MWRC (2018b). Mid-Western Regional Council Regional Economic Development Strategy 2018 - 2022. Mid-Western Regional Council. June 2018.

MWRC (2020). Our Place 2040 Mid-Western Regional Local Strategic Planning Statement. Mid-Western Regional Council. May 2020.

MWRC (2022a). Mid-Western Region Community Plan – Towards 2040. July 2022. Accessed on 17 February 2023 at <https://www.midwestern.nsw.gov.au/files/assets/public/council/plans-and-strategies/towards-2040-community-plan-adopted-web.pdf>.

MWRC (2022). 2022 Economic and Business Profile for the Mid-Western Region. Mid-Western Regional Council. October 2022.

MWRC (2023). About the Region webpage visited 17 January 2023 <https://www.midwestern.nsw.gov.au/Business/About-the-Region>.

NSW Government (2021a). Regional Housing Taskforce Findings Report. September 2021

NSW Government (2021b). Code of conduct for the short-term rental accommodation industry. NSW Fair Trading, Department of Customer Service. October 2021. Accessed on 12 May 2023 at https://www.fairtrading.nsw.gov.au/_data/assets/pdf_file/0012/925788/Code-of-Conduct-for-the-Short-term-Rental-Accommodation-Industry.pdf. NSW Government (2022). Central-West Orana Renewable Energy Zone Transmission Project Scoping Report. Prepared by the energy Corporation of NSW on behalf of the NSW Government. September 2022.

NSW Government (2023b). Mid-Western Regional Council Regional Economic Development Strategy 2023 Update. Mid-Western Regional Council. February 2023.

NSW Government – Planning (2023a). Population Projections Explorer web page accessed 5 April 2023 at <https://www.planningportal.nsw.gov.au/populations>.

Parkeselvisfestival (2023). Webpage accessed 7 April 2023 at <https://www.parkeselvisfestival.com.au/blog/>

Parliament (2022). Health outcomes and access to health and hospital services in rural, regional and remote New South Wales, May 2022, from <https://www.parliament.nsw.gov.au/committees/inquiries/Pages/inquiry-details.aspx?pk=2615>

Ramboll (2020). Stubbo Solar Farm Environmental Impact Statement. Ramboll Australia Pty Ltd for UPC Renewables Australia Pty Ltd, December 2020.

Ramboll (2021a). Stubbo Solar Farm Amendment. Ramboll Australia Pty Ltd for UPC Renewables Australia Pty Ltd, June 2021.

Ramboll (2021b). Stubbo Solar Farm Response to Submissions Report. Ramboll Australia Pty Ltd for UPC Renewables Australia Pty Ltd, June 2021.

REMPPLAN (2023). Region explorer - Mid-Western Regional Council. Industries. Accessed 25 January at <https://app.rempln.com.au/?search=midwestern>

Squadron Energy (2023). Uungala Wind Farm Accommodation and Employment Strategy. June 2023. Accessed 22 June 2023 at <https://squadron-assets.spicyweb.net.au/main/Uungala/PDFs/Monitoring-Audit-and-compliance/UWF-02-PLN-AES-20230609-000.pdf>.

Tilt (2022). Liverpool Range Wind Farm Consultative Committee Meeting Minutes. Tilt Renewables Pty Lth. October 2022. Accessed on February 16 at <https://www.tiltrenewables.com/assets-and-projects/liverpool-range-wind-farm/liverpool-range-wind-farm-community/>.

Umwelt (2022a). Accommodation and Employment Strategy Wollar Solar Farm. Prepared by Umwelt (Australia) Pty Limited on behalf of Sunterra Energy Pty Ltd. September 2022

Umwelt (2022b). Accommodation and Employment Strategy Wellington North Solar Farm. Prepared by Umwelt (Australia) Pty Limited on behalf of Lightsource bp Renewable Energy Projects Ltd. May 2022.

Vena Energy (2023). Vena Energy website. Accessed on 6 April 2023 at https://www.venaenergy.com.au/all_projects/bellambi-heights-bess/.

Wollar Solar (2023). Project website. Accessed 6 April 2023 at <https://wollarsolar.com.au/timeline/>.



Appendix A: MWRC Letter of Endorsement



Office of the General Manager

LP | LAN900112

5 June 2023

Michael Yeo
Suite 2, Level 2
15 Castray Esplanade
Battery Point TAS 7004

Dear Michael,

SUBJECT: STUBBO SOLAR FARM (SSD-10452) ACCOMMODATION AND EMPLOYMENT STRATEGY

Thank you for the opportunity to provide feedback on the revised Accommodation and Employment Strategy.

Referring to Stubbo Solar Stage 2a updated Accommodation and Employment Strategy v5 (dated 19 May 2023) and additional supporting documentation (dated 26 May 2023), Council is pleased to offer its support and approval of the Accommodation and Employment Strategy. It is important to note that our endorsement is with the expectation that ACEN Australia diligently adheres to the strategy in all aspects. Should any modifications or adjustments be required to the strategy in the future, Council requests ACEN Australia to communicate with Council promptly.

We specifically note that ACEN Australia is committed to not booking tourist hotels or motels in the Mid-Western Regional Local Government Area, and that ACEN Australia will continue to liaise with Council and accommodation providers regarding major events and other key activities where accommodation is required for visitors.

In accordance with the strategy, Council acknowledges that the anticipated peak number of construction workers on-site will be approximately 520 individuals. These workers will comprise both local and non-local workers classified as follows;

Local Workers	Up to 154
Non-Local EPC Contractors/Managers	Up to 21
Other Non-Local Workers	Up to 363

Works are scheduled to commence immediately and are expected to be completed in March 2025.

To ensure minimal impact on tourism accommodation needs in Mid-Western Regional Council Local Government Area Stubbo Solar workers will seek accommodation as follows:

% of workers	Accommodation	Notes
Up to 9% of workers housed in a private room in a local home	Up to 31 workers in private rooms in local homes	If more property owners are willing to rent rooms during the construction period, this number could increase
Up to 65% of workers housed in a managed property in the Mudgee-Gulgong area	237 workers in up to 88 dwellings	Assuming 3 bedrooms per rental and 1 person per room
Up to 5% of workers are housed in Mudgee-Gulgong caravan and holiday parks	Up to 18 workers in cabins/caravans	Assuming 1 person per cabin/caravans
Up to 15% of workers housed in short-stay rentals such as Airbnb in the Mudgee-Gulgong area	Up to 53 workers in short stay accommodation	Assuming each venue has 3 bedrooms per property and 1 person per room, 18 dwellings in total

To preserve short-term accommodation stock for tourism demand, Stubbo Solar workers will reserve accommodation up to six weeks before it is required.

Please note that the project's intention is to allow 6% of the workers to be located at Frog Rock (24 workers in total). At this point in time, the development consent for this property only permits accommodation for up to 7 individuals.

Council note, if accommodation availability levels in the Mudgee-Gulgong district during peak construction periods are significantly lower than currently being reported and forecast in version 5 of the Accommodation and Employment Strategy, ACEN Australia will work with Mid-Western Regional Council and local landholders to consider temporary accommodation options, such as caravan sites, on local private properties (subject to compliance with relevant planning conditions).

As a further option, if required, ACEN Australia will work with PCL Construction and TransGrid to source accommodation options in Wellington, Dunedoo and Dubbo. Council advises ACEN Australia needs to discuss this accommodation strategy with Warrumbungle Shire Council and Dubbo Regional Council, as there are major SSD projects and tourism related activities in Dubbo Local Government Area.

Mid-Western Regional Council does not support "park and ride" type purposes on public land due to insufficient car parking available in the region, and no public car parks or public roads infrastructure are to be used for park and ride.

Quarterly review meetings will be held between ACEN Australia and Mid-Western Regional Council to review the Accommodation and Employment Strategy. Council requests ACEN Australia supply Council with information reporting current accommodation types utilised and projections at these meetings commencing July 2023. The following meetings will be held in September 2023, December 2023, March 2024 and June 2024, and ongoing until the completion of the project.

Council appreciate your attention to these recommendations and look forward to further discussions to ensure the successful implementation of the Stubbo Solar Project, while mitigating any adverse impacts on the region.

It is important to note that the Council's approval for the project depends on the implementation and adherence to the Accommodation and Employment Strategy.

Should you have any further enquiries regarding this matter, please contact Council on (02) 6378 2850.

Kind regards,

A handwritten signature in black ink, appearing to be 'BRAD CAM', with a long horizontal flourish extending to the right.

BRAD CAM

GENERAL MANAGER



Appendix B: Accommodation options in the region

Appendix B - Accommodation Research – Stubbo Solar Farm

Establishment	Address	Phone No.	Type	No. rooms/ bedrooms	Outcome
Gulgong – approximately 15 minutes travel time to the Stubbo Solar Farm site					
Gulgong Tourist Park	8 Goolma Road, Gulgong	(02) 6374 1294	Caravan Park	19	15 powered sites – would need to book early
Owl Head Lodge	241 Bergalin Road, Gulgong	0473 742 744	Cottages	2 motel studios 2 cabins 1 cottage 1 bdrm 1 cottage 2 bdrm	
Daisy's Cottage	95 Belmore Street, Gulgong	None provided	Cottage	1 cottage 3 bdrm	Booking.com
Gulgong Telegraph Cottage	5 Robinson Street, Gulgong	0455 862 580	Studio & apartment	2 studio 2 bdrm 1 aptmt 2 bdrm	
Mudgee - approximately 40 minutes travel time to the Stubbo Solar Farm site					
Flora Cottage	13 Market Street, Mudgee	0455 505 882	Cottage	3 bdrm	
Riddell Cottage	21 Market Street, Mudgee	None provided	Cottage	2 bdrm	
Hardy on Bellevue	14A Hardy Crescent, Mudgee	0428 859 509	Duplex	2 bdrm	Short term accommodation
70 on Mortimer	70 Mortimer Street, Mudgee	None provided	Apartments	4	Booking.com
Wombadah Luxury Accommodation	44 Tierney Land, Mudgee	0458 191 098	B&B	4	
Afton House B&B	63 Church Street, Mudgee	(02) 6372 7696	B&B	5	
Birches B&B	1 Bombira Avenue, Bombira	0438 940 398	B&B	3	
Forgandenny House B&B	17 Short Street, Mudgee	(02) 6372 2437	B&B	3	
Putta Bucca B&B	27 Putta Bucca Road, Mudgee	0427 751 334	B&B	1	
Mudgee Merlot Gate Guesthouse	116 Gladstone Street, Mudgee	0487 921 088	B&B	4	Booking.com
Mudgee Homestead Guesthouse	31 Coorumbene Road, Mudgee	(02) 6373 3786	B&B	7	
Units on Robertson	36 Robertson Street, Mudgee	None provided	Unit	1	
Mudgee Apartments on Horatio Street	27A Horatio Street, Mudgee	0409 304 872	Apartment	3 x 1 bdrm	
Stay in Mudgee	639 Castlereagh Highway, Mudgee	0475 389 353	Homestead Cottage Cottage	4 bdrm 1 bdrm 1 bdrm	
Parklands Resort and Conference Centre	121 Ulan Road, Mudgee	(02) 6372 4500	Resort	70	
Mudgee Riverside Caravan and Tourist Park	27 Short Street, Mudgee	(02) 6372 2531	1 bdrm Cabins 2 bdrm villas	30	Mon- Thurs, not weekends 32 powered sites – advise booking early to secure.
Big 4 Mudgee Park	71 Lions Drive, Mudgee	(02) 6372 1090	Cabins	22	26 powered sites – advise booking early to secure.
Mudgee Valley Park	2-8 Bell Street, Mudgee	(02) 6372 1236	Cabins	50	17 powered sites – advise booking early to secure.
Peppertree Hill and Peppertree Hill Terraces, The Willows and The Laneway (see immediately below)	Various locations in and around Mudgee	(02) 6372 0443	Cottages x 4 Cottages x 5 Cottage x 1 Homestead 1	1 bdrm 2 bdrm 3 bdrm 4 bdrm	

The Laneway	1A Sydney Road Street, Mudgee	(02) 6372 0443	Apartments x 7	2 bdrm	
Peppertree Terraces	110-112 Church Street, Mudgee	(02) 6372 0433	Apartments x 6	4 x 1 bdrm 2 x 2 bdrm	1 and 2 bdrm options
The Willows	54 Douro Street, Mudgee	(02) 6372 0443	Apartments	4 x 3 bdrm	Booking.com
The Wandering Grape	44A Market Street	None provided	Apartment	1 bdrm	Booking.com
Maggie's Place	None provided	None provided	Apartment	3 bdrm	
My Space on Market –	124 Market Street, Mudgee	None provided	Loft 4 Apartment 2	1 bdrm 2 bdrm	Booking.com
44 The Lane	44 Market Street Rear, Mudgee	None provided	Apartment	1 bdrm	
Inara Apartment	3/78A Denison Street, Mudgee	None provided	Apartment	1 bdrm	Booking.com
Evanslea Luxury Boutique Accommodation	146 Market Street, Mudgee	0455 505 882	Cottages x 4 House	1 bdrm 4 bdrm	
Perry Street Hotel	40 Perry Street, Mudgee	(02) 6372 7650	Suites	13 bdrm	Peppertree Hill Group
Kirsten Accommodation	No address provided	1300 768 674	Apartments Cottage x 1	1 bdrm 7 bdrm	
Avoca House	44 Horatio Street, Mudgee	None provided	House	3 bdrm	Booking.com
Yallambie	None provided	None provided	House	4 bdrm	Booking.com
Kuzman Homestead	53 Court Street, Mudgee	None provided	House	3 bdrm	Booking.com
The Coach House on River and Park	5 Lawson Street, Mudgee	None provided	House	3 bdrm	Booking.com
Denison Lodge	36 Denison Street, Mudgee	None provided	House	3	Booking.com
The Mudgee Bungalow	None provided - Mudgee	0421 401 491	House	3	Booking.com
Currawong Bungalow	None provided - Mudgee	None provided	House	3	Booking.com
Abbingdon House	7 Carara Road, Mudgee	0438 945 197	House	4	
Contemporary Mudgee Weekender	11 Costigan Court, Mudgee	None provided	House	4	Booking.com
Nikki's on Market Street	None provided	None provided	House	2	Booking.com
Comfortable home	2A Park Avenue, Mudgee	None provided	House	2	Booking.com
Mudgee Getaway with Yard, near Racecourse	None provided	None provided	House	3	Booking.com
Cottage on Church	61 Church Street, Mudgee	None provided	House	3	Booking.com
Mudgee Country Grandeur Home	21 Mulgoa Way, Mudgee	None provided	House	6	Booking.com
Bellevue Mudgee	None provided	None provided	House	4	Booking.com
8 th Tee	None provided	None provided	House	4	Booking.com
Private Mudgee Villa	None provided	None provided	House	1	Booking.com
Terrace on Horatio	83 Horatio Street, Mudgee	None provided	House	3	Booking.com
A Market Place, Mudgee	18 Market Street, Mudgee	None provided	House	3	Booking.com
Almas Mudgee	154 Market Street, Mudgee	0408 893935	House	3	
Ellington Manor	40 Mortimer Street, Mudgee	(02) 6372 7272	House	6	
Mudgee Explorer Accommodation	26 George Street, Mudgee	0474 971 785	House (Lodge) House (Villa)	6 3	
Dunedoo - approximately 45 minutes travel time to the Stubbo Solar Farm site					
Dunedoo Caravan Park	Bolaro Street, Dunedoo	(02) 6375 1455	Caravan Park	3 cabins 12 donger rooms	First in best dressed, call after 16:30 To book cabins and dongers, phone 0448 992372 9am to 9pm Powered and unpowered sites available, recommend booking early to secure.

Dunedoo Campsite and Self-Contained Cabin	14 Tucklan Street, Dunedoo	None provided	Cabin	1 cabin	Book via https://www.hipcamp.com/en-AU/land/new-south-wales-dunedoo-campsite-self-contained-cabin-9mxh8yd1?utm_source=atdw&adults=1&children=0
Dunedoo Shearer's Huts	1058 Tucklan Road, Dunedoo	0428 758 284	Cabin and house	5	2 x 1 bdrm cabins with adjoining bathroom (plans to add extra bathroom). 1 x older style 3 bdrm house with external bathroom (will not be available via Airbnb etc.) Host is amenable to longer-term stays and is open to providing hot daily meal and possibly packed lunches.
Hotel Dunedoo	26 Bolaro Street, Dunedoo	(02) 6375 1403	Hotel	10	Can accommodate some construction workers and could provide packed lunches if needed.
Royal Hotel	78-80 Bolaro Street, Dunedoo	0408 448 172	Hotel/B&B	12	Can provide packed lunch and laundry service. Happy to accommodate longer stays. Large carpark to the rear
Redbank Gums B&B	41 Wargundy Street, Dunedoo	(02) 6375 1218	Cabins/B&B	2	
Strathroy Guesthouse	None provided	0427 745 111	House	4	
Dubbo – approximately 90 minutes travel time to the Stubbo Solar Farm site – accommodation webpage - https://dubbo.com.au/visit/dubbo-region-directory?category=accommodation					
Abel Tasman Motor Inn	133-135 Whylandra Street, Dubbo	(02) 6885 2555	Motel	38	Includes 1 disabled room and 2 family rooms Website: https://www.abeltasmanmotorinn.com.au/
Aberdeen Motel	25 Cobra Street, Dubbo	(02) 6884 1700	Motel	32	Website: https://southerncrossmotelgroup.com.au/motels/nsw/dubbo-accommodation/the-aberdeen-motel/
Across Country Motor Inn	85 Whylandra Street, Dubbo	(02) 6882 0877	Motel/units	23	Website: https://www.acrosscountrymotorinn.au/
Akuna Motor Inn and Apartments	109-111 Whylandra Street (Newell Highway), Dubbo	(02) 6885 4422	Motel	16	Website: https://www.akunamotorinn.com.au/
All Seasons Motor Lodge	78 Whylandra Street, Dubbo	(02) 6882 6377	Motel	19	Website: https://allseasonsmotorlodge.com.au/
Amaroo Hotel	81Macquarie Street, Dubbo	(02) 6882 3533	Hotel	24	Website: https://amaroohoteldubbo.com.au/
Australian Heritage Moor Inn	216 Brisbane Street, Dubbo	(02) 6884 1188	Motel	27	Website: http://www.australianheritagemotorinn.com.au/
Blue Gum Dubbo Motel	109 Cobra Street, Dubbo	(02) 6882 0900	Motel	24	Website: https://www.bluegumdubbo.com.au/
Cascades Motor Inn	147 Cobra Street, Dubbo	(02) 6882 3888	Motel	36	Website: https://www.cascadesmotorinn.com.au/
Castlereagh Hotel	Cnr Brisbane and Talbragar Streets, Dubbo	(02) 6882 4877	Hotel	26	Website: https://www.imghotels.com.au/castlereaghhoteldubbo
Cattleman's Country Motor Inn and Serviced Apartments	8 Whylandra Street, Dubbo	(02) 6884 5222	Motel and apartments	175	Website: https://cattlemans.com.au/
Centrepoint Motel	146 Bourke Street, Dubbo	(02) 6882 7644	Motel	14	Website: https://www.cmdubbo.com.au/
Comfort Inn	57 Cobra Street, Dubbo	(02) 6882 7033	Motel	16	Website: https://www.bookonline.com/hotel/comfort-inn-dubbo
Country Apartments	230 Brisbane Street, Dubbo	(02) 6885 1141	Apartments	9	Website: https://www.countryapartments.com.au/ Offer special rates for bookings over 28 days.
Country Leisure Motel	86 Cobra Street, Dubbo	(02) 6882 3988	Motel	15	Website: https://www.countryleisuredubbo.com.au/
Countryman Motor Inn	47 Cobra Street, Dubbo	(02) 6882 7422	Motel		Website: http://www.countrymandubbo.com.au/
Discovery Parks, Dubbo	154 Whylandra Street, Dubbo	(02) 6884 5222	Cabins	63	Website: https://www.discoveryholidayparks.com.au/caravan-parks/new-south-wales/orana-dubbo?utm_source=google&utm_medium=organic&utm_campaign=gmb&utm_term=visit-website&utm_content=DHP-NSW-Dubbo
Dubbo Midstate Caravan Park	21 Bourke Street, Dubbo	(02) 6882 1155	Motel/Cabins	29	Website: https://dubbomidstate.com.au/accommadation/
Dubbo RSL Club Motel	Cnr Brisbane Street and Wingewarra Street, Dubbo	(02) 6884 9099	Motel	34	Website: https://dubborslmotel.com.au/
Eastend Studio Apartments	277-283 Cobra Street, Dubbo	0447 466 575	Apartments		Premium self-contained apartments offering both long and short stays, contactless check-in and common areas to enjoy, reduced rate for longer stays. Website: https://www.eastenddubbo.com.au/
Endeavour Court Motor Inn	94-98 Bourke Street, Dubbo	(02) 6881 1000	Motel	17	Website: https://www.endeavourcourtmotel.com.au/
Forest Lodge Motor Inn	248 Mayall Street, Dubbo	(02) 6882 6500	Motel	15	Website: https://forestlodgedubbo.com.au/
Fountain View Motel	113-115 Cobra Street, Dubbo	(02) 68829777	Motel		Website: https://www.fountainviewmotel.com.au/
Garden Hotel	Gipps Street, Dubbo	(02) 6882 3371	Motel	19	Website: https://www.gardenhotel.com.au/

Golden West Motor Inn	87 Cobra Street, Dubbo	(02) 6882 3822	Motel	28	Website: http://www.goldenwestmotorinn.com.au/
Ibis Budget Dubbo	14 Victoria Street, Dubbo	(02) 6882 9211	Motel	65	Website: https://all.accor.com/hotel/3496/index.en.shtml?utm_campaign=seo+maps&utm_medium=seo+maps&utm_source=google+Maps
Manera Heights Apartment Motel	43 Cobbora Road, Dubbo	(02) 6884 3865	Apartments	16	Website: https://maneraheights.com.au/
Matilda Motor Inn	231 Darling Street, Dubbo	(02) 6882 3944	Motel	52	Website: https://www.matildamotorinn.com.au/
Night Cap at Macquarie Inn	Cnr Wheelers Lane and Birch Avenue, Dubbo	(02) 6884 1955	Motel	29	Website: https://nightcaphotels.com.au/hotels/nsw/nightcap-at-macquarie-inn?utm_source=google_yext&utm_medium=organic&utm_campaign=book-a-room
NRMA/Big 4 Dubbo Holiday Park	18 Alfred Street, Dubbo	1800 824 820	Motel/Cabins	46	Website: https://www.nrmaparksandresorts.com.au/dubbo/book-now
Orana Motel Dubbo	95 Cobra Street, Dubbo	(02) 6882 7888	Motel	34	Website: https://www.oranamotel.com.au/
The Oxley Motel	85 Cobra Street, Dubbo	(02) 6882 4444	Motel	54	Website: https://www.oxleydubbo.com.au/
The Palms Motel	39 Cobra Street, Dubbo	(02) 6881 8155	Motel	24	Website: https://www.tpmd.com.au/
Park Vue Motel	131 Bourke Street, Dubbo	(02) 6882 4253	Motel		
Quality Inn Dubbo International	165 Whylandra Street, Dubbo	(02) 6882 4777	Motel	60	Website: https://www.choicehotels.com/en-uk/new-south-wales/dubbo/quality-inn-hotels/au736?checkInDate=2023-03-22&checkOutDate=2023-03-23
Quest Dubbo	22 Bultje Street, Dubbo	(02) 5809 8600	Apartment	65	Website: https://www.questapartments.com.au/properties/nsw/dubbo/quest-dubbo?utm_source=GoogleMyBusiness&utm_medium=organic&utm_campaign=dubbo
The Shearing Shed Motor Inn	31 Cobra Street, Dubbo	(02) 6884 2977	Motel	23	Website: https://www.shearingshedmotel.com.au/
Sure Stay (Blue Diamond) Hotel	113-115 Wingewarra Street, Dubbo	(02) 6882 0666	Hotel	23	Website: https://www.bestwestern.com/en_US/book/hotel-rooms.90541.html?aff=BAU&iata=90000026&ssob=BLSSH0004G&cid=BLSSH0004G:google:gmb:90541
Tallarook Motor Inn	17 Stonehaven Avenue, Dubbo	(02) 6882 7066	Motel	32	Website: https://www.tmidubbo.com.au/
West View Caravan Park	13R Narromine Road, Dubbo	0488 028 992	Cabins	16	Website: https://www.westviewcaravanpark.com.au/
Wellington - approximately 60 minutes travel time to the Stubbo Solar site					
Bridge Motel Wellington	5 Lee Street, Wellington	(02) 6845 2555	Motel	13	Website: https://wellingtonbridgemotel.com.au/
Central Hotel Wellington	16 Nanima Crescent, Wellington	0457 798 269	Hotel	No data	No website
Cow and Calf Motel	135 Lee Street, Wellington	(02) 6845 2710	Motel	20	Website: https://www.cowandcalf.com.au/
Federal Hotel	100 Arthur Street, Wellington	(02) 6845 2914	Motel	15	Website: https://www.imghotels.com.au/federalhotelwellington
Grand Hotel	111-113 Lee Street, Wellington	(02) 6845 1303	Hotel	18	Website: https://grandhotelwellington.com/ Can provide longer-term rooms, breakfast and meals catering
Hermitage Hill Country Retreat	135 Maxwell St, Wellington	(02) 6845 4469	Cottages	13	Website: https://hermitagehill.com.au/
Motel Mandalay	32 Lee Street, Wellington	(02) 6845 1011	Motel	22	Website:
Wellington Caves Holiday Park	Caves Road, Wellington	(02) 6840 6480			Website: https://www.wellingtoncaves.com.au/stay
Wellington Motor Inn	37 Maxwell St, Wellington	(02) 6845 1177	Motel	11	No website
Wellington Riverside Caravan Park	1 Federal Street, Montefiores	(02) 6845 1370	Cabins	14	Website: https://www.wellingtonriversidepark.com.au/
Coolah - approximately 60 minutes travel time to the Stubbo Solar site – accommodation webpage: https://www.warrumbungle.nsw.gov.au/tourism/accommodation/coolah-accommodation					
Coolah Black Stump Inn	61 Binnia Street, Coolah	(02) 6377 1231	Hotel		No website
Coolah Black Stump Motel	10-14 Campbell Street, Coolah	(02) 6377 1208	Motel	12	Website: https://www.blackstumpmotelcoolah.com.au/
Coolah Short Stays	60 Binnia Street, Coolah	0429 771 031	Apartments	2	No website
Coolah Valley Hotel	28 Binnia Street, Coolah	(02) 6377 1210	Hotel		No website
Other locations					
Avonlea farm stay	Maryvale, 2820	0407 071 352			

Cudgegong River Holiday Park	Burrendong Dam Road, Yarrabin	(02) 6373 0378	Cabins	15	Note this is just outside the 60-minute commute polygon
Golden Fleece Motor Inn	117-119 Bettington Street, Merriwa	(02) 6548 2777	Motel	6	Website: https://www.countrymerriwagoldenfleecemotorinn.com.au/
Grattai Grove	809 Old Grattai Road, Grattai	0400 353 190	Cottages	1 cottage 3 bdrm 1 cottage 1 bdrm	
Hair of the Dog Inn	26 Federation Street, Ballimore	(02) 6886 5131	Motel	7	Approximately 1hr to drive to Stubbo SF
Hangar House	25 Tim Longeran Drive, Bombira	0417 752 054	Suites	5	Has runway and aircraft hangar
Little Corvo Farm Stay	Tallawang			1	Airbnb – approx. \$500/wk discount for monthly stay
Merriwa Motor Inn	50 Bettington Street, Merriwa	(02) 6548 2273	Motel		Website: https://www.merriwamotorinn.com.au/
Mitchell Inn, Guerrie	47 Mitchell Highway, Geurie	(02) 6887 1265	Motel	8	1 hour 10 minutes travel time to the Stubbo Solar Farm site
Mudgee Guesthouse	51 Henry Lawson Drive, Bombira	0411 309 142	B&B	6	Booking.com
Reflections Holiday Park – Lake Burrendong	468 Fashions Mount Road, Mumbil	(02) 6846 7435	Cabins	10	Website: https://reflectionsolidayparks.com.au/parks/lake-burrendong/
Royal Hotel	19-23 Buccleugh Street, Cassilis	(02) 6376 1004	Motel and cottage		Website: https://theroyalhotelcassilis.business.site/?utm_source=gmb&utm_medium=referral



Appendix C: Events list 2023

Scheduled events in the Mid-Western Regional Council area 2023.

Event	Location	Timing/date
Mudgee Farmers Markets	Mudgee	Monthly, 28/1/2023, 18/2/2023 etc.
Lawson Park Markets	Mudgee	Monthly, 14/1/2023, 11/2/2023 etc.
Mudgee Makers' Market	Mudgee	Monthly, last Saturday of the month
Dunedoo Show	Dunedoo	10/2/2023 to 11/2/2023, annual event
NRL Telstra Premiership round 4 – Dragons v Rabbitohs	Mudgee	18/2/2023
Gulgong Show	Gulgong	18/2/2023
Mudgee Races – Country Championships	Mudgee	19/2/2023
Rylstone-Kandos Show and Bull-a-Rama	Rylstone/ Kandos	24/2/2023 to 25/2/2023, annual event
Mudgee Show	Mudgee	3/3/2023 to 4/3/2023, annual event
Mudgee Craft Beer and Cider Festival	Mudgee	4/3/2023, annual event
ALM Central Coast Mariners v Macarthur FC	Mudgee	11/3/2023
Putta Bucca Carp Muster	Putta Bucca	11/3/2023
Dunedoo Carp Muster	Dunedoo	11/3/2023
Robert Stein Annual Foot crush Feast	Mudgee	12/3/2023, annual event
Mudgee Region Food and Drink Trail	Mudgee	18/3/2023 to 19/3/2023
Can Cruise event	Mudgee	18/3/2023, annual event
Mudgee Glow	Mudgee	31/3/2023
NRL Telstra Premiership Round 5 Sea Eagles v Knight	Mudgee	1/4/2023
Gulgong Gold Cup (horse race at Gulgong Racecourse)	Gulgong	4/6/2023
Easter		7/4/2023 to 10/4/2023
School autumn break		10/4/2023 to 21/4/2023
18 th National Historical Machinery Association Rally	Bombira	14/4/2023 to 15/4/2023
Mudgee Classic (cycling event)	Mudgee	29/4/2023 to 30/4/2023, annual event

Event	Location	Timing/date
Angus Breeders Sale	Mudgee	12/5/2023, annual event
Henry Lawson Heritage Festival (Gulgong)	Gulgong	3/6/2023 to 5/6/2023, annual event
UneARThed	Gulgong	3/6/2023
School winter break		3/7/2023 to 14/7/2023
Mudgee Small Farm Field Days	Mudgee	7/7/2023 to 8/7/2023
Mudgee Running Festival	Mudgee	20/8/2023
Mudgee Wine and Food Month	Mudgee	2/9/2023 to 29/9/2023, annual event
Flavours of Mudgee	Mudgee	23/09/2023
School spring break		25/9/2023 to 6/10/2023
Sculptures in the Garden	Mudgee	7/10/2023 to 9/10/2023, annual event
Rugby 7s Tournament		8/10/2023
Wildflower Music Festival, Mudgee	Mudgee	29/10/2023
Tunes on the turf	Dunedoo	10/11/2023 to 12/11/2023
School summer break		Eastern division – 20/12/2023 to 29/1/2024 Western division – 20/12/2023 to 5/2/2024
Other potential events not yet scheduled for 2023 (but which have been held previously include) Mudgee Masters, Rylstone and Kandos Family Fun Day, Rylstone Street Feast and Gardens of Mudgee. Note there may be events missing from this snapshot survey.		

Scheduled events in the Dubbo Regional Council area

Event	Location	Timing/date
Stock route Country Music Festival	Dubbo	11/3/2023
TITAN Macquarie Mud Run	Dubbo	18/3/2023

Event	Location	Timing/ date
Wellington Boot Racing Carnival	Wellington	24 and 25/3/2023, annual event
Orana Reining Club Show	Dubbo	25 and 26/3/2023, annual event
Beers to the Bush	Dubbo	25/3/2023
Wellington Rotary Market	Wellington	25/3/2023
Melanoma March	Dubbo	25/3/2023
Dubbo Rotunda Market	Dubbo	26/3/2023
Bulmar Ultrawhite Ram Sale	Dubbo	29/3/2023
Orana Equestrian Club – Official Competition	Dubbo	1-2/4/2023
Dubbo Farmers Market	Dubbo	1/4/2023
Dubbo Classic Cars and Coffee	Dubbo	2/4/2023 - monthly
Easter		7/4/2023 to 10/4/2023
Lake Burrendong Easter Fishing Classic	Lake Burrendong	7/4/2023
Man from Ironbark Festival	Stuart Town	8/4/2023
Easter Showdown	Dubbo	8-9/4/2023
Easter Toyota Nationals	Dubbo	8-9/4/2023
Dubbo Rotunda Market	Dubbo	9/4/2023
Australian Palouse Pony Association 40 th National Show	Dubbo	9/4/2023
School autumn break		10/4/2023 to 21/4/2023
Australian Miniature Horse Society Youngstock and Veteran Show	Dubbo	14-16/4/2023
Harness Racing	Dubbo	14/4/2023 and 16/4/2023
Dubbo Farmers Market	Dubbo	15/4/2023
Release Your Inner Drag Queen	Dubbo	15/4/2023
Dad for Kids Festival	Dubbo	16/4/2023

Event	Location	Timing/ date
Wellington Rotary Market	Wellington	22/4/2023
Dubbo Rotunda Market	Dubbo	23/4/2023
Dubbo Motor Bike Rally	Dubbo	6/5/2023
Dubbo Farmers Market	Dubbo	6/5/2023
Wellington Show	Wellington	13/5/2023
Dubbo Farmers Market	Dubbo	13/5/2023
Dubbo Annual Show	Dubbo	19 - 21/5/2023
Dubbo Farmers Market	Dubbo	20/5/2023
Variety Bash	Dubbo	21/5/2023
Dubbo Show	Dubbo	26-28/5/2023
Wellington Rotary Market	Wellington	27/5/2023
Dubbo Farmers Market	Dubbo	27/5/2023
Poultry Show	Dubbo	27/5/2023 – weekends through to 23/7/2023
Dubbo Rotunda Market	Dubbo	28/5/2023
Ranch Sorting National Championships	Dubbo	2-4/6/2023
Dubbo Farmers Market	Dubbo	3/6/2023
Orana Avicultural Society Annual Show	Dubbo	4/6/2023
Herefords Australia National Show and Sale	Dubbo	6/6/2023
DubCon	Dubbo	10-12/6/2023
Dubbo Rotunda Market	Dubbo	11/6/2023
National Shorthorn Show and Sale	Dubbo	13-14/6/2023
Dubbo Winter Whisky Festival	Dubbo	16-17/6/2023
Wellington Rotary Market	Wellington	24/6/2023
School winter break		3/7/2023 to 14/7/2023

Event	Location	Timing/ date
IMHR Winter Woolies, Young Stock and Gelding Show	Dubbo	29-30/7/2023
Aerial Firefighting Asia/Pacific Conference	Dubbo	2/8/2023
22 nd NSW Weeds Conference	Dubbo	8-10/8/2023
Dubbo Dream Festival	Dubbo	13-23/10/2023
National Merino Ram Show and Sale	Dubbo	22-23/8/2023
Ranch Sorting	Dubbo	25-27/8/2023
School spring break		25/9/2023 to 6/10/2023
Dubbo Stampede	Dubbo	27/8/2023
Dubbo Motor Fest	Dubbo	2/9/2023
Central Western Performance Horse Show	Dubbo	9-10/9/2023
Central Western Performance Horse Show	Dubbo	14-15/10/2023
Caravan Camping 4WD Fish and Boat Show	Dubbo	15-17/9/2023
Cross Cultural Carnivale 2023	Dubbo	23/9/2023
Ranch Sorting	Dubbo	20-22/10/2023
Central Western Performance Horse Show	Dubbo	11-12/11/2023
School summer break	Eastern division – 20/12/2023 to 29/1/2024 Western division – 20/12/2023 to 5/2/2024	



Appendix D: Health services

Health services

With people coming into the area to support the project, there are likely to be impacts on other services in the region such as health services. The Stubbo Solar Farm is located in the Western NSW Local Health District. A wide range of services are available in the district ranging from Aboriginal health, cancer services, mental health, oral health and pharmacy services. Further information can be found at <https://wnswlhd.health.nsw.gov.au/our-services>.

Mudgee and Gulgong are towns in the Mid-Western Regional LGA that support local hospitals:

- **Mudgee Hospital** is located at 30 Meares Street, Mudgee NSW 2650 (ph. (02) 6378 6222). Facilities include -
 - 24-hour Accident and Emergency (A&E) Department with five treatment bays, resuscitation equipment, safe assessment room and an isolation room
 - 28 acute general medical and surgical beds
 - CT scanner and eight dialysis chairs
 - four ambulatory care spaces (increased from two), including a treatment room
 - peri-operative service with operating rooms, day surgery area and recovery area
 - outpatient services and community health
 - four chair Oncology service and a Maternity unit
 - five chair oral health unit
- **Gulgong Multipurpose Service** is located at 34 Goolma Road, Gulgong NSW 2852 (ph. (02) 6374 3400). Facilities include -
 - 24-hour Accident and Emergency (A&E) Department and provides acute care and general medicine
 - four in-patient beds
 - six aged care beds

The townships of Dunedoo and Coolah in Warrumbungle Shire LGA have local hospitals as follows:

- **Dunedoo Memorial Health Service (Hospital)** is located at 29-37 Diligah Street, Dunedoo NSW 2844 (ph. (02) 6370 3000). Facilities include –
 - 24-hour Accident and Emergency (A&E) Department and provides acute care and general medicine
 - five acute beds
 - 25 residential aged care beds
- **Coolah Multipurpose Service** is located at 111-135 Martin Street, Coolah NSW 2943 (ph. (02) 6377 9100). Facilities include:
 - 24-hour Accident and Emergency (A&E) Department and provides acute care and general medicine
 - six acute care beds
 - 26 residential aged care beds

- Physiotherapy is offered twice weekly, pathology, medical imaging twice weekly and a Community Health Nurse five days per week.
- Additional services include Telehealth services, mental health, women’s health and child and family services.
- **Rylstone Multipurpose Service** is located at 24 Fitzgerald Street, Rylstone 2849 (ph. (02) 6357 6100)
 - 24-hour emergency care
 - Inpatient beds including general medicine, rehabilitation and palliative care
 - Residential aged care services
 - Medical imaging services (x-ray)
 - Pathology services
 - Opioid replacement program
 - Community health services include health promotion programs, community nursing, child and family health, women’s health, wound management, a cardiac rehabilitation program and physiotherapy
 - Visiting non-LHD services include mental health, podiatry, diet and nutrition, and speech pathology.

The township of Wellington in the Dubbo Regional LGA has a hospital as follows:

- **Wellington Hospital** (Wellington Health Service), 30 Thornton Street, Wellington NSW 2820, (ph. (02) 6845 5500). Facilities include:
 - All emergency presentations are seen by a visiting medical doctor on a 24-hour roster
 - 12 acute care beds
 - Other services include but are not limited to psychiatry, physiotherapy, dietician, occupational therapy and dentistry.

The nearest city hospital is located in Dubbo (approximately 90 minutes travel time from Stubbo Solar by vehicle).

The services and the location of the hospitals and some other local health services are presented in Table 1.

Table 1. Mid-Western Regional, Dubbo Regional and Warrumbungle Shire LGAS health services health services

Facility	Services	Address	Driving time from site (approx.)
Mudgee Hospital	A&E, pathology and x-ray services	30 Meares Street, Mudgee	40 minutes
Gulgong Multipurpose Service	General practice services	34 Goolma Road, Gulgong	14 minutes

Mudgee Medical Centre	General practice services	145 Church St, Mudgee (ph. 6372 8100)	40 minutes
Rylstone Multipurpose Service	Community health services	24 Fitzgerald Street, Rylstone	1 hour 15 minutes
Dubbo Base Hospital	A&E, pathology and x-ray services	Myall St, Dubbo	1 hour 28 minutes
Dunnedo Memorial Health Service (Hospital)	Community health services	29-37 Digilah Street	47 minutes
Gulgong Medical Centre	Medical services (Mon – Fri)	102 Herbert Street, ph. (02) 6374 1104	12 minutes
Swan Surgery, Dunedoo	General practice services	4 Digilah Street, Dunedoo ph. (02) 6370 3070	46 minutes
South Mudgee Surgery	General practice services	9 Oporto Road, Mudgee ph. (02) 6372 4355	40 minutes
The Dentists of Gulgong	General dental services	114 Mayne Street, Gulgong, ph. 1800 883 384	12 minutes
Mudgee Dental Boutique	General dental services	Shop 5, 47-55 Market Street, Mudgee, ph. (02) 6372 7582	34 minutes
Dr Pisto Dental Surgery	General dental services	35 Byron Place, Mudgee ph. (02) 6372 1933	35 minutes
Dental Surgery	General dental services	71 Church Street, Mudgee ph. (02) 6372 1397	34 minutes
Central West Dental Care	General dental services	136 Church Street, Mudgee ph. (02) 6372 2566	35 minutes
Mudgee Orthodontics	Orthodontics	55 Mortimer Street, Mudgee, ph. (02) 6348 5217	35 minutes
Dunedoo Dental Surgery	General dental services	Digilah Street, Dunedoo, ph. (02) 6370 3080	46 minutes



Appendix E: MWRC accommodation request



MID-WESTERN REGIONAL COUNCIL
PO Box 156, MUDGEE NSW 2850
86 Market Street, Mudgee | 109 Herbert Street, Gulgong | 77 Louee Street, Rylstone
T 1300 765 002 or 02 6378 2850 | F 02 6378 2815
E council@midwestern.nsw.gov.au

AA | LAN900112

24 March 2023

Cédric Bergé
ACEN
Level 22,
8 Exhibition Street,
Melbourne,
VIC 3000

SUBJECT: Workforce and Accommodation Strategy Stubbo Solar Farm (SSD-10452)

Dear Cedric,

I am writing to confirm that Council does not support the use of tourist and visitor accommodation to be included in the Stubbo Solar project Workforce and Accommodation Strategy. As you are aware, Council has been actively working to promote sustainable tourism and ensure that our local tourism industry thrives. The Mid-Western Regional Economic Development Strategy (REDS) – 2023 identifies tourism as an important engine industry to the local economy. Accommodation availability is key to the success of this industry.

The region has a multitude of large scale events that are in the planning for 2023 and 2024, and it is important to reserve tourist beds for visitors to these events.

While we understand that the Stubbo Solar workforce will be an important part of our local economy, we believe that it is essential to find alternative accommodation solutions that do not impact the visitor economy.

We hope that you will take our concerns into consideration and work towards finding a solution that is in the best interest of our community.

Sincerely,

A handwritten signature in black ink, appearing to read "Alina Azar".

ALINA AZAR
DIRECTOR DEVELOPMENT



Appendix F: Bowdens Silver IPC extract

Extract from Independent Planning Commission (IPC) hearing in relation to Bowdens Silver – 17th February 2023

Firstly, I would like to thank everyone in the community who has made the effort and taken time away from their work and their families to come and have their say these past few days. We appreciate the uncertainty and anxiety that has occurred during the long EIS and approvals process. But while it is a long process, it is an important process. It is thorough and helps ensure that the highest standards are achieved. As we move to a conclusion, we hope the decision will help bring a level of certainty for the community and for Bowdens Silver.

We have heard a range of views over the past couple of days and a number of questions have been raised and we welcome the opportunity to address some of those now.

On the first day of the hearing, the Commissioners had a few questions. Commissioner Sykes asked what changes would need to be made to the processing to cater for the extraction of other metals or for an increase in the quantity of material being extracted. I provided a general answer. However, I have another point to make in that regard.

For us to be able to extract gold from an open-pit in addition to the silver, zinc and lead, would require a relatively minor process addition.

The most likely scenario is that we would recover gold in pyrite in one floatation circuit producing a high precious metals pyrite concentrate that would contain silver as well. Further metallurgical testing is currently being undertaken to make a determination. If an additional circuit would be required or justified, it would only be a minor increase in the accommodated plant footprint area. That concentrate would likely be sold as is, with further concentrating or smelting occurring off site. That assumes no additional throughput, in other words, maintaining the authorised 2.0 million tonnes per year.

However, any further expansion whether open-cut or underground, fundamentally would require greater water usage and there would be many other items that would require full assessment and of course approvals. In terms of expanding processing facilities, the main components of processing: crushing and grinding machinery and flotation

cells are typically bolt on components. This would be provided within the planned processing plant area.

I trust that further answers your question Commissioner Sykes.

Commissioner Cochrane provided a question on notice with regards to staffing accommodation options for the project. This is a very good question and in particular in a market which is ever changing in our region.

Some of the speakers mentioned the tight housing market and how a new project might further exacerbate this. The increase in tourism in Mudgee during and post-COVID has not been without its challenges. The increase in AirBNB style accommodation has put pressure on the housing market. Renewable energy projects north of Mudgee will also place significant pressure. Mudgee is having to adapt and evolve.

Our discussions with Council have covered these issues and we will work closely with them to address our accommodation requirements. In our discussions with Council we talked about looking east rather than west from the Mine Site, looking to Kandos and Rylstone for housing opportunities. These discussions have involved a potential joint venture with Council to create accommodation. Proper accommodation in cabins or the like, fully equipped. Keep in mind that for our construction staff of 320 we expect that many of the required services such as builders, plumbers, electricians, earthworks, etc, will be able to be sourced locally out of what is already here and available. The industrial sector of Mudgee has considerable already installed capability.

In terms of our ongoing workforce during operations, we see that a considerable amount of our workforce will be local and living here already. We have already seen local coal mine workers who live in Lue, Rylstone and Kandos express significant interest in employment once we are operational. We have received in excess of 300 applications and expressions of interest from local people, many local coal mining people. We know that the demand for employment is there and the community is genuinely excited about this opportunity.

For those in the Kandos community, they commute for work and for some that is over 2.5 hours of commute time per day. Bowdens Silver being 25 minutes away will obviously save significant time with obvious social benefits. The Mine Site is less than 20 minutes from Rylstone.

Our accommodation strategy also includes the upskilling and hiring of local people who are already living in the area, whose families live in the area and who want to be able to stay here and raise their own children in the region.

It also means we'll be working with the local community to provide opportunities for young people, school leavers and tertiary students to get the training and skills development that they need so they can stay and live in the region, rather than having to travel elsewhere for employment opportunities.

The important thing here about the job opportunities the mine will deliver is that they are long-term, secure, sustainable jobs that will enable local people to plan their futures and build strong family roots in this community.

We do not pretend that we will get all of our employees locally, there are some specialty skills required for precious metals process and there are jobs that will come from outside the area. However, these people will be required to live and work locally. There will be no Fly-In -Fly-Out.

We have, and will always have, a locals-first approach to jobs. That is our steadfast commitment and it can be seen in the 24-odd staff we already employ today.

So to summarise, the point I'm making here is that we are determined to employ as many local people as possible which not only brings social and economic benefits to these families, but it will help to minimise and negate any impacts on local housing.

We will work in joint venture with Council and with other key stakeholders to develop a detailed Accommodation Strategy that caters for any additional requirements and ensures we aren't competing with other industries for accommodation.

I trust that answers your question Commissioner Cochrane. If there is any more detail required, we can provide that in our written submission next week.

I would like to spend part of the time remaining to talk about some issues that have been raised however the detail of these issues are somewhat hidden. We talk about the appetite for local development and jobs, we have heard from community members these last few days about the appetite for development and jobs. From what I have seen over the past six and a half years being here, walking the streets speaking to people, community meetings large or small, close neighbour meetings, reading submissions to our Environmental Impact Statement and seeing submissions on the IPC website, development and jobs is by far the most talked about issue in the communities. That is clear.

When we turn right outside our Mine Site heading 30 kilometres to Mudgee, that seems all quite fine. Mudgee is booming, it bounced out of Covid very well. The coal mines have kept producing, tourism is doing well, other agriculture is doing a lot better since the drought. We have the vineyards and wineries. The town and surrounds is the envy of many other towns. That is all clear and very good to see. But I will come back to the future of Mudgee in a moment.

However, when you turn left out of our Mine Site, the picture could not be more different. Lue and Rylstone appear to be doing OK but only when you compare them to Kandos. Kandos is the larger of the three towns with a population of over 1200 and located about 25 minutes from the Mine Site. Kandos has issues, it has major issues.

I understand issues can sometimes be difficult to talk about when it comes to the health and financial wellbeing of individuals and families. However these sorts of issues are in our community. To an extent it is hidden, it is not often spoken about. Many think of Mudgee and how well it is doing but what is happening further afield? Allow me to provide some statistics on Kandos which are hugely worrying.

I apologise for those here who might be a part of these Census statistics, however, I think it is critically important that they are understood and tabled.

In Kandos, household income is about a third of that of the State average.

48.0% of households earn less than \$650 per week - the State average of that earning bracket is around 16.3%. That is household income not individual income.

Divorce and separations are double the State average.

43.1% of two parent families have both parents not working.

17.2% of people have achieved Year 9 or below at school.

40.0% of people have not achieved year 12.

I find this completely unacceptable in Australia in this day and age. To be clear I am not critical of children leaving school early if they are going into TAFE or the like and learning a decent trade or gaining other opportunities in training. But it is well documented that educational disadvantage in early life has a negative impact on career prospects and future earning capabilities.

This is all 2021 census data, the latest data. If you compare these figures to the previous 2016 census, the dial has barely moved, very minor improvements since 2016 or stagnation.

Graduates from Kandos High have virtually no jobs to go to. They are heading out of their community (to Penrith, Sydney or elsewhere) to find a job or they are staying in the community and going on welfare.

To me as someone who knows a little about numbers, data, statistics, trends, situations and outcomes, if this does not represent the demise or destruction of a society I don't know what does. With no jobs there is no future and people leave, the young, in particular leave.

Rylstone is better across all these statistics but only slightly better and still substantially below the State and national averages.

Worse still is health.

The 2021 Census tells us that figures for Cancer, Diabetes, Heart Disease, Kidney Disease and Mental Health in the Kandos and surrounding area are roughly double the State and national averages. In fact, every single health category listed in the Census for Kandos and surrounds is significantly worse than the State and national averages. And it is not improving.

That all sounds terrible and I think we all know why. The socio-economic decline of Kandos was caused by the closure of industry: the cement works closed, the coal mine closed and nothing came in to replace them. People lost their livelihoods. We now have the problems we have due to a lack of investment and a lack of planning and that has had a very negative impact on society.

Now I am not going to say that we will solve all of these local issues. That wouldn't be right. But developing a substantial new industry with local, high paying jobs, enabling people to live locally, raise their families and spend locally populating and supporting the schools and other educational institutions will make a very big difference. 228 jobs in operations and the rule of thumb is that approximately 2.5 additional jobs are created for every worker employed by mining through local services and supply industries. That is over 500 jobs.

Now, I hear it said yes but you only have a 23 year project life with a 16.5 year mine life. That is correct, however, we have certainly demonstrated that there are opportunities for extension in the future, the depth of the silver mineralisation is still continuing, opportunities in gold and perhaps copper are considerable and that is just at the Bowdens Silver site. Mineral exploration in the region is highly promising. We expect that our mine life will grow. The mineral system is large and there is a real possibility that this project will still be in operational in 50 years time. And there are other minerals discoveries possible in our region as demonstrated in our exploration works to date. Obviously once we define

and complete assessments over the coming years, all of that would be subject to State approvals.

Now one final point to make on the subject of our towns and the surrounds. We have heard about what happened to Kandos. What is going to happen to the Mudgee region? Coal mining will go into decline at some point as the country moves to net zero by 2050. According to the Mid-Western Regional Council, total output from the LGA is approximately \$6.5 billion per year. The three coal mines in the LGA produce around \$3.7 billion per year or 56% of output for our area. There are around 2200 jobs in the three local coal mines or about 19% of the local workforce. It is big business for Mudgee and the LGA. So what happens? We know that wind and solar farms are going to be built locally. There are some large ones planned north of Mudgee, and Gulgong way. Whether we like it or not a lot of people will come in to build, however after the build that workforce will not remain, these projects are low maintenance and are low in employee numbers. We as a region must diversify. Yes more tourism, more vineyards and wineries, more artisan industries, more agriculture, developed technologies. I am all for it if it makes sense and is done responsibly. However, what industry is going to be doing the heavy lifting? Again, I do not pretend that Bowdens Silver will solve all the issues but as a State and as a region, we need to start to develop, start the planning otherwise children in our LGA will be facing significant intergeneration decline.

I have mentioned some very ordinary statistics on local education. I have strong personal views on education and training and we have helped instil that into our work place. We continue to help the schools of Lue, Rylstone and Kandos. We have contributed and mentored to Max Potential Australia programs locally which encourage high school children to accelerate their potential and to challenge themselves. We have had work experience school children on site. When we talk about local jobs, yes we have a local pool of people who have experience in mining who have skills, however, we want to be encouraging school leavers and others to come in, undertake training, be the best they can be in the work place. We have also announced a stewardship program for young indigenous in the community. And mining offers diverse roles other than operators– roles in technology, environment, administration and health and safety to name a few. We do not pretend that all of our staff in

construction or operations will be able to be sourced locally. However, there will be a significant component that whether skilled or unskilled will be ready to undertake training.

All of our staff whether now or as we develop will be eligible for continued educational and training programs. Continual health and safety programs are a given. However, we may have a truck driver who might want to become an accountant, a field hand who might like to work in procurement, an office worker who might like to become a plant operator. It goes on. Multi skilled, education and training pathways.

We have a special relationship in tertiary education. We allow the University of New South Wales to utilise the Bowdens site to further education. Over time we have had PhD students, Masters students, Geology and Honours students coming to live and work at Bowdens, to conduct their academic work and help us further understand the importance of the Bowdens Silver Deposit and surrounds.

The other point I would like to make is the how dynamic the mining industry is. I like to think Australia is the best in the world. I know the Americans and Canadians would contest that. But Australia is a mining economy. Of the top 10 exports out of Australia each year, 7 of those 10 top revenue makers are mining and petroleum products. The other three are education (4th), beef (6th) and wheat (10th). The mining industry is fluid, it is changing all the time. Technologies are changing all the time. It is massively adapting right now to be able to deliver the raw materials as we decarbonise our societies.

Then we look at our Project and our assessment. As I have previously mentioned we have accepted the draft Conditions of Consent as provided by the Department of Planning and Environment. Those Conditions of Consent are of course before the Commission. In those draft conditions, there are 135 items and many many more subitems. Standing behind this document at the Federal and State levels are the laws, regulations, policies, standards and protocols. Conditions of Consent are designed to cover particular items in general and topics that may be very specific for our site. The EIS, the amendments, the Assessment Report and the Draft Conditions of Consent is a snapshot of the Project at a particular point in time. As an example, in the draft conditions we have agreed to further

modelling work when it comes to our water balance and acid mine drainage. This is to further confirm our findings, our EIS findings, the findings of the government agencies and our peer reviewers and government peer reviewers. That is all fine. However, that is not the end of it. We don't just tick a box there and move on. Throughout the mine life and beyond, water, water balances, tailings, AMD, biodiversity, rehabilitation, GHG emissions, will continue to change. All of this is adaptive management that seeks to better the outcomes whether it is from an optimisation point of view or improving environmental, health, safety and other outcomes. As a very basic example, we have been working over the past eight months or so on refining and optimising our recoveries of metals in our process flow sheet. Recoveries are very likely to be better, a lot better. That is great for the business, however, there are benefits in having less metal content being deposited in tailings. As I have mentioned, the project and the mine life is likely to change, we may have an underground mine in the future, we may look to extract gold as well as silver, zinc and lead. Obviously any such changes are subject to a lot of technical work, all the assessments and of course State Government approvals. Mining and this project in particular will be very dynamic over time and most certainly in a positive way.

One last point to make and we will have more to say in our submission next week on the economic benefits created by the project. In the Assessment Report the cost benefit analysis (or CBA) indicates a net production benefit of \$89 million to Australia and \$44 million to New South Wales. That is OK and yes it is not the benefit you may see from a large coal mine. However, with our reduced Green House Gas Emissions, that will increase the CBA numbers with greater renewable energy in the grid along with other on-site benefits such as our potential small solar plant. Also in the CBA calculation, it only assumes a benefit from new jobs created not jobs that already exist that are then transferred. With the rapid acceleration of pressures on the coal mining industry and now the scheduled closures, we will in fact be saving jobs. That substantial benefit is not taken into consideration in a CBA.

We are investing a large amount of money locally. To date we have spent over \$80 million on exploration, assessments, freehold purchases, local services, local businesses, etc. That excludes the project acquisition or corporate costs. We have spent almost \$9 million in wages locally.

For development we will be investing some \$310 million in capital works. Most of that is for the startup being invested next year, assuming approvals. In addition to the capital costs, over the life of mine we will invest around \$1.3 billion over the life of the project. That is onsite costs, wages, consumables, services, contractors and so forth. Partly included in that is taxation and royalties in the order of \$350 million over the life of mine.

We also have our \$3 million invested in local infrastructure including roads with our agreement with Council.

The point I am making here is that the local flow-on economic benefits are considerable which can be somewhat hidden in a formal cost benefit analysis. In addition, we have also spoken about the potential expansion opportunities which are yet to be quantified.

We will have more to say on this and other matters in our submission that have been raised during the last few days of the Bowdens Silver Hearing.

I would like to thank all from the community who have presented these last few days. Importantly I would like to thank the Commissioners for their work and diligence, Dr Smith and the Commission's team for organising this important Hearing.



Appendix G: MWRC correspondence and response table



MID-WESTERN REGIONAL COUNCIL
PO Box 156, MUDGEES NSW 2850
86 Market Street, Mudgee | 109 Herbert Street, Gulgong | 77 Louee Street, Rylstone
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E council@midwestern.nsw.gov.au

Office of the General Manager

LP | LAN900112

9 May 2023

Michael Yeo
Suite 2, Level 2
15 Castray Esplanade
Battery Point TAS 7004

Dear Michael,

SUBJECT: STUBBO SOLAR FARM (SSD-10452) ACCOMMODATION AND EMPLOYMENT STRATEGY

Thank you for the opportunity to provide feedback on the Stubbo Solar accommodation and employment strategy. We have carefully reviewed the accommodation and employment strategy ACEN provided and advise there are further improvements required to the strategy before a letter of support may be provided from Council.

We note, there will be a maximum of 520 people working at any one time at the Stubbo Solar project, commencing May 2023 with an anticipated peak in April and May 2024 and reducing to under 50 non-local workers from December 2024.

1. Use of Tourism Accommodation

We note, authors have considered the range of comments provided by Council in reference to acknowledging the importance of tourism accommodation to the tourism industry and detailing further information regarding cumulative impacts of multiple SSD developments in the region. We specifically note, Stubbo Solar are committed to not booking tourist hotels or motels in Mid-Western Regional Local Government Area and that Stubbo Solar will continue to liaise with Council and accommodation providers in regards to major events and other key activities where accommodation is required for visitors.

Table 7.1 & 7.2 - We note that no personnel will be accommodated in motels and hotels in Mid-Western Region and up to 218 personnel will be accommodated in motels and hotels in Dubbo LGA. We advise that ACEN needs to discuss the accommodation strategy with Dubbo Regional Council and investigate availability of accommodation options, as there are major SSD projects and tourism related activities in Dubbo also. Mid-Western Regional Council is reluctant to support the strategy unless it is confirmed that accommodation is available in Dubbo LGA.

Further references are made to accommodation in the Warrumbungle's Shire and Mid-Western Regional Council strongly recommends engagement with Warrumbungle's Shire Council in relation to availability of this.

2. Short Term Accommodation

It is noted on page 9, that “a maximum of 25% of the non-local workforce may be accommodated in short term accommodation in MWR LGA”. This equates to (total workforce 520 * 88% non-local * 25%) = 114 people. Council requests ACEN to advise what short term accommodation is proposed for these 114 people.

Table 7.1 “Indicative workforce numbers by LGA and accommodation type” considers a total of 363 beds, however at peak of the total non-local workforce is 457 (520 x 88%). Can ACEN please clarify plans for accommodating the 94 additional staff.

On page 69, the report states ‘Short-term accommodation would need to be reserved / procured well in advance (at least six to eight weeks) as recommended by survey accommodation providers to ensure construction workers are adequately housed’. This is of concern to Council, as travel data supports that tourists are currently booking 6-8 weeks from time of travel, so if construction is booked at 8 weeks, this will mean visitors/tourists will miss out on this accommodation. Council requests that any short-term accommodation is booked no earlier than 6 weeks from time of stay to ensure preference is provided to tourists.

It is noted that 15% of other non-local workers are to be housed in short-term accommodation such as AirBnbs, B&Bs and farm-style accommodation in the MWR LGA. It is important to note that usage of these properties will need to be in line with current planning regulations and development consent for such properties.

3. Long Term Accommodation

We note long-term rental accommodation in the Mid-Western LGA will be sourced to service EPC non-local contractor and non-local workers with longer-term contracts (over 12 months). Up to 38 rooms will be required which equates to approximately 13 x 3-bedroom houses. Can ACEN please confirm this is the maximum long term accommodation to be utilised.

Due to the various proposed accommodation sources, can ACEN confirm if there will be an Accommodation Coordinator appointed for the project?

4. General Errors in the report

Please note there are a range of general errors in the report provided to Council:

Table 4.6: information that is not accurate;

- Hospital – Gulgong and Rylstone are Multi-Purpose Services (MPS) not hospitals
- Health – These are to be on the list of healthcare services in the local area Appendix C which was not attached.
- Railway Station – Mudgee train station is closed
- Gulgong has 1 supermarket the IGA
- Petrol Stations – Kandos has 2 petrol stations
- Cinema – Mudgee does not have a cinema; the town hall is used for movies once per month.

Page 59 paragraph 2:

The peak construction period is assumed to be from November 2024 to August 2024 when the workforce exceeds 50% of the total workforce (i.e., is greater than 260 personnel) as stated in Section 5.1.2.

Should this be November 2023?

Table 4.7 - The events listed is not exhaustive and a number of potential events are in the planning that will use tourism accommodation including multiple events at Glen Willow Regional Sports Complex, including but not limited to A-League and NRL matches.

Page 63 - the last sentence is not complete.

5. Finalisation of links in the document

So Council can be fully informed on the scope of the strategy, we note all the links in the word document to reference materials not did work. This needs to be finalised. Further the appendices were not provided to be reviewed and need to be provided as part of Council's review. These include but are not limited to references on:

- Page 72 - a list of accommodation options attached as Appendix A – not attached
- Page 101 - a list of healthcare services in the local area Appendix C – not attached
- Page 102 - an events list for all 3 LGA's for 2023/2024 Appendix B – not attached

6. Cumulative impacts

Table 6.1 and Figure 6.1 - We note that the timing of some of the projects are subject to change. In particular, Wollar Solar have started civil works (March 2023) yet their project timeline does not align with your information. This project will now overlap significantly with Stubbo Solar. This should be addressed in the report, in particular update Figure 7.3.

Due to the approval of Bowden's Silver Mine, with a planned construction workforce commencing in 2024 of 320, Council does not consider Kandos and Rylstone accommodation options as viable. Any accommodation proposed in Kandos and Rylstone should be omitted from your calculations with updated recommendations.

7. Employment Strategy

In regard to Employment Strategy, it is unclear as to how recruitment will take place to meet the total construction workforce of 520 FTE. Can this be further clarified?

We acknowledge information provided in regard to the use of contractors and sub-contractors and continue to encourage Stubbo Solar to work with as many local businesses as possible to deliver this.

In regard to Healthcare, Council notes ACEN's intention to promote the use of Telehealth Services with GPs and online health prescription services, however Council requests that a formal arrangement is made with a Telehealth organisation for employees of this project.

8. Code of Conduct

Council requests that as part of the Employment Strategy that the following is included in the proposed "Employee Responsibilities" and this should include Contractors also.
Employees and contractors of ACEN:

- a) Compliance: All employees/contractors must operate in compliance with all applicable laws, regulations, and permits. This includes environmental regulations, labour laws, and workplace health and safety regulations.
- b) Transparency: All employees/contractors must be transparent in their operations and provide accurate and timely information to the council, the community, and other stakeholders. This includes disclosing any potential environmental or health risks.

- c) Community Engagement: All employees/contractors must engage with the community and other stakeholders in a meaningful and respectful manner.
- d) Environmental Stewardship: All employees/contractors must employ best practices to minimise the environmental impact of their operations. This includes effective management of waste, emissions, and water usage, as well as responsible land rehabilitation.
- e) Responsible Employment Practices: All employees/contractors must uphold fair and ethical employment practices, ensuring workers' rights are respected, and health and safety standards are met.
- f) Behaviour of Employees and Contractors when in town centres: All employees and contractors must act with integrity, professionalism, and respect towards others and when interacting with the broader community. All vehicles to be well-maintained and not leave excessive amounts of mud or dirt on the road. No high-visibility work wear is to be worn and no safety flags to be on vehicles unless it is absolutely necessary for safety reasons.
- g) Health and Safety: All employees/contractors must prioritise the health and safety of their employees, the community, and other stakeholders. They must implement measures to prevent accidents and respond promptly and effectively to any incidents that may occur. This includes responsible travel to and from sites and when in town centres.

9. Workforce transport impacts

We note there are 200 to 250 parking spaces planned for the Stubbo Solar site for use by the construction workforce for personal vehicles, vans and buses, with a peak workforce of 520 there will be insufficient parking space at the construction site if each worker drives their personal vehicles to the site. Mid-Western Regional Council do not support "park and ride" type purposes on public land due to the insufficient car parking available in the region and no public car parks or public roads infrastructure are to be used for park and ride.

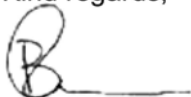
We note pick up from accommodation with busses is an option, however ACEN will need to provide numbers of busses that will be used for consideration by Council and proposed transport route.

Further noting the proposed use of accommodation in Dubbo and Warrumbungle's, it is important that discussion is undertaken with Dubbo and Warrumbungle Regional Councils regarding this.

10. Monitoring and Review

Council requests that it be included in the Quarterly Monitoring and Review of the AES, including reporting current accommodation types utilised and projections of these on a quarterly basis. This continual engagement will allow Council to share important activities and dates that would impact worker / tourist accommodation availability and key issues for other SSD Projects Accommodation Strategies.

Kind regards,



BRAD CAM
GENERAL MANAGER

Stubbo Solar Farm – SSD-10452
AES – MWRC correspondence 9 May 2023 to ACEN – PCL and Accent response

Document: Accommodation and Employment Strategy (AES)

Revision: Version 18 May 2023

Letter signatory: Brad Cam (General Manager) Letter recipient: Michael Yeo (ACEN Project Manager (Construction))

Item	Observation	AES section	Response
1.	<p>Use of Tourism Accommodation</p> <p>Council notes Stubbo Solar are committed to not booking tourist hotels or motels in MWR LGA and will continue to liaise with Council and accommodation providers regarding major events and other key activities where accommodation is required for visitors. Council recommends Stubbo Solar liaise with Dubbo Regional and Warrumbungle Shire Councils regarding potential construction worker accommodation needs</p>	Section 7	A review of accommodation has been completed and now includes expressions of interest by local accommodation providers. It is likely accommodation will not be required in Dubbo Regional and Warrumbungle Shire LGAs and therefore liaison with these councils is not necessary at present unless the accommodation situation changes. Refer to Table 7.1 of the AES.
2.	<p>Short-Term Accommodation</p> <p><i>“It is noted on page 9, that “a maximum of 25% of the non-local workforce may be accommodated in short term accommodation in MWR LGA”. This equates to (total workforce 520 * 88% non-local * 25%) = 114 people”</i></p>	Section 5.1 and Table 5.2	Stubbo Solar will create up to 520 jobs comprised of 345 non-local workers, 154 local workers and 21 PCL non-local workers (estimated number of workers for March 2024 (during construction peak). The AES focuses on the accommodation of up to 363 non-local construction workers and up to 21 PCL non-local staff (384 people in total). It is assumed local workers will already be accommodated locally and their accommodation is therefore not considered. Table 7.1 provides an indicative summary of the accommodation types they will be housed in and when.
	The proposed reservation requirement of 6-8 weeks is of concern to the Council and requests this be reduced to six weeks.	Section 7.3.1, Table 11.1 AES04, AES06 and AES07	Stubbo Solar will reserve accommodation up to six weeks before it is required to preserve short-term accommodation stock to cater for tourism demand.
	B&Bs, Airbnbs and farm style accommodation that will be used to accommodate construction workers should have the appropriate regulatory approvals for such use.	Section Table 11.1 AES05	Noted, there is a duty of care to ensure selected accommodation is appropriately permissioned and registered on the STRA Register as per the <i>State Environmental Planning Policy (Affordable Rental Housing) Amendment (Short-term Rental Accommodation) 2021</i> .
3.	<p>Long-term accommodation</p> <p>Can ACEN confirm up to 13 x 3-bedroom dwellings will be rented for the duration of the Stubbo Solar construction phase</p>	Section 7	It is likely a larger number of managed dwellings (a combination of house rentals and Airbnb, Stays, Hipcamp etc.) will be required to house the non-local accommodation workforce. However, the expression of interest process has promoted the recruitment of new rentals to the existing rental market, significantly reducing the competition for existing rentals. Stubbo Solar commits to the continued recruitment of new rentals.

Stubbo Solar Farm – SSD-10452
AES – MWRC correspondence 9 May 2023 to ACEN – PCL and Accent response

Document: Accommodation and Employment Strategy (AES)

Revision: Version 18 May 2023

Letter signatory: Brad Cam (General Manager) Letter recipient: Michael Yeo (ACEN Project Manager (Construction))

			The actual number of dwellings required is dependent various factors including the number local workers recruited, the number of bedrooms available per dwelling and the possibility of workers sharing rooms. Indicative accommodation requirements are provided in Table 7.1 of the AES.
	Can ACEN confirm if there will be an Accommodation Coordinator appointed for the project?	Table 11.1	The ACEN Project Manager is accountable for the implementation of and compliance with the AES and is supported by nominated officers at the Stubbo Solar site from PCL and Transgrid. PCL and Transgrid are responsible for their scopes of work.
4.	General errors in the report		
	Table 4.6 inaccurate information: <ul style="list-style-type: none"> Hospital – Gulgong and Rylstone are Multi-Purpose Services (MPS) not hospitals Health – These are to be on the list of healthcare services in the local area Appendix C which was not attached. Railway Station – Mudgee train station is closed Gulgong has 1 supermarket the IGA Petrol Stations – Kandos has 2 petrol stations Cinema – Mudgee does not have a cinema; the town hall is used for movies once per month. 	Section 4.5 Table 4.6, Appendix C	<ul style="list-style-type: none"> Table 4.6 amended accordingly Appendix C, Health Services, amended accordingly
	Page 59 paragraph 2 <i>“The peak construction period is assumed to be from November 2024 to August 2024 when the workforce exceeds 50% of the total workforce (i.e., is greater than 260 personnel) as stated in Section 5.1.2.”</i>	Section 5.1.2	Page 59 paragraph 2 amended to: <i>“The peak construction period is assumed to be from November 2023 to August 2024 when the workforce exceeds 50% of the total workforce (i.e., is greater than 260 personnel) as stated in Section 5.1.2.”</i>
	Table 4.7 - The events listed are not exhaustive.	Section 4.6	Text has been amended to read: <i>“ events in the MWR LGA include but are not limited to those listed in Table 4.7 (EMM 2022c). A more comprehensive list of events is provided in Appendix B.”</i>
	Page 63 - the last sentence is not complete. <i>“ Table 7.6 shows the number of rooms potentially available based on various occupancy rates; fractional values are rounded down to the nearest whole number).”</i>	Section 7.3.1	Text has been amended to read: <i>“ Table 7.5 shows the number of rooms potentially available based on various occupancy rates (fractional values are rounded down to the nearest whole number).”</i>
5.	Finalisation of links in the document Not all links to referenced documentation work.	Section 14 References	Hyperlinks in Section 14 References are fixed.
6.	Cumulative impacts We note that the timing of some of the projects are subject to change. In particular, Wollar Solar have started civil works (March	Section 7.3.1	The Wollar construction phase has changed by four months and the associated workforce data has been adjusted accordingly. This data was sourced from the approved Wollar Solar Farm AES available on the Wollar Solar Farm website (https://wollarsolar.com.au/). Figures 6.1 and 7.1 in the Stubbo Solar AES have been revised with updated workforce

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AES – MWRC correspondence 9 May 2023 to ACEN – PCL and Accent response

Document: Accommodation and Employment Strategy (AES)

Revision: Version 18 May 2023

Letter signatory: Brad Cam (General Manager) Letter recipient: Michael Yeo (ACEN Project Manager (Construction))

	2023) yet their project timeline does not align with your information. This project will now overlap significantly with Stubbo Solar. This should be addressed in the report, in particular update Figure 7.3.		numbers. The Wollar Solar Farm accommodation types have been reviewed and differ significantly to the Stubbo Solar proffered accommodation to date. Therefore, it is likely sufficient accommodation has been sourced to cater for the combined non-local workforce housing needs without compromising tourism requirements in the MWR LGA. The Stubbo Solar AES has been adjusted to reflect this updated information.
	Council does not consider Kandos and Rylstone accommodation options as viable.		Any accommodation proposed in Kandos and Rylstone is omitted from accommodation calculations; updated indicative accommodation recommendations are provided in Table 7.1.
7.	Employment Strategy It is unclear as to how recruitment will take place to meet the total construction workforce of 520 FTE. Can this be further clarified?	Section 8.4	Additional information provided in Section 8.4
	Council requests that a formal arrangement is made with a Telehealth organisation for employees of this project	Not applicable	The provision of Telehealth services by the EPC contractor will not be considered. References to the EPC contractor providing Telehealth services have been removed from the AES. This does not preclude workers from sourcing Telehealth services themselves and these references remain in the AES.
8.	Code of conduct Council requests the following is included in the proposed Code of Conduct “Employee Responsibilities” and this should include Contractors also: a) Compliance: All employees/contractors must operate in compliance with all applicable laws, regulations, and permits. This includes environmental regulations, labour laws, and workplace health and safety regulations. b) Transparency: All employees/contractors must be transparent in their operations and provide accurate and timely information to the council, the community, and other stakeholders. This includes disclosing any potential environmental or health risks. c) Community Engagement: All employees/contractors must engage with the community and other stakeholders in a meaningful and respectful manner. d) Environmental Stewardship: All employees/contractors must employ best practices to minimise the environmental impact of their operations. This includes effective management of waste, emissions, and water usage, as well as responsible land rehabilitation. e) Responsible Employment Practices: All employees/contractors must uphold fair and ethical employment practices, ensuring	Section 10	Requested code of conduct clauses included in Section 10 of the AES.

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	<p>workers' rights are respected, and health and safety standards are met.</p> <p>f) Behaviour of Employees and Contractors when in town centres: All employees and contractors must act with integrity, professionalism, and respect towards others and when interacting with the broader community. All vehicles to be well-maintained and not leave excessive amounts of mud or dirt on the road. No high-visibility work wear is to be worn and no safety flags to be on vehicles unless it is absolutely necessary for safety reasons.</p> <p>g) Health and Safety: All employees/contractors must prioritise the health and safety of their employees, the community, and other stakeholders. They must implement measures to prevent accidents and respond promptly and effectively to any incidents that may occur. This includes responsible travel to and from sites and when in town centres.</p>		
9.	<p>Workforce transport impacts</p> <p>No park and ride facilities are available in the region</p>	Section 9	Noted
	Provide numbers of busses that will be used for consideration by Council and proposed transport route.	Table 9.2 Figure 9.3	Indicative transport vehicle numbers are shown in Table 9.1. Indicative bus routes are shown in Figure 9.3
	Further noting the proposed use of accommodation in Dubbo and Warrumbungle, discussion with Dubbo and Warrumbungle Regional Councils is required.	Section 7.1.2	Following a revision of the available accommodation in Mid-Western Regional LGA, it is unlikely accommodation further afield in Dubbo Regional and Warrumbungle Shire LGAs will be required and therefore liaison with these councils is not currently required.
10.	Council requests that it be included in the Quarterly Monitoring and Review of the AES	Section 12	Request acknowledged and included in Table 11.1 and Section 12.

David McKay
Project Manager
ACEN Australia
Suite 2, Level 2
15 Castray Esplanade
Battery Point, TAS, 7004

21/06/2023

Dear David McKay,

Stubbo Solar Project (SSD-10452-PA-28)
Accommodation and Employment Strategy - Request for Additional Information

I refer to the Accommodation and Employment Strategy submitted to the Department of Planning and Environment (the Department) as required under the conditions of the development consent for the Stubbo Solar Project. After careful consideration, the Department is requesting that you provide additional information.

Please submit a revised document that addresses the requirements detailed in the attached management plan review table and marked-up pdf.

You are requested to provide the information to the Department by Friday 7 July 2023. If this timeframe is not achievable, please provide and commit to an alternative timeframe for providing this information.

If you have any questions, please contact Katie Weekes on 02 4927 3223 or via email at katie.weekes@dpie.nsw.gov.au.

Yours sincerely

A handwritten signature in black ink, appearing to read "W Jones".

Wayne Jones
Team Leader - Post Approval
Energy Assessments

**Stubbo Solar Farm – SSD-10452
Post Approval Review**



Document: Accommodation and Employment Strategy (AES)

Revision: Version 6 dated 7 June 2023 and Version 7a dated 27 June 2023

Reviewed: Katie Weekes on 20 June 2023 and 5 July 2023

		Editorial note: Blue text = DPE comments following Applicant response 27 June 2023, Version 7a.		Blue text = company response to DPE comments on Version 7a
<i>Obligation to Minimise Harm to the Environment, Condition 1, Schedule 2</i>	Sufficient (Yes/No/Partial)	Document reference and comment	Action Required	Company Response
In meeting the specific environmental performance criteria established under this consent, the Applicant must implement all reasonable and feasible measures to prevent and/or minimise any material harm to the environment that may result from the construction, operation, upgrading or decommissioning of the development.	Yes	Section 1.3 addresses this condition.	-	-
<i>Accommodation and Employment Strategy, Condition 33, Schedule 3</i>	Sufficient (Yes/No/Partial)	Document reference and comment	Action Required	Company Response
Prior to commencing construction, the Applicant must prepare an Accommodation and Employment Strategy for the development in consultation with Council, and to the satisfaction of the Planning Secretary.	Yes	This document. Consultation with MWRC is detailed in sections 1.7, 1.8 and 1.9. Appendix A contains MWRC letter of endorsement dated 5 June 2023. See agency comments for commitments detailed in letter of endorsement.	-	-
This strategy must:	-	-	-	-
(a) propose measures to ensure there is sufficient accommodation for the workforce associated with the development;	Partial Yes	Section 7 provides an accommodation strategy. Section 11 Table ES1 and Table 2.1, update wording for this condition – ‘measures’ instead of ‘strategy’. Resolved See comments in pdf of AES. Key points: Define short and long term. Resolved No details provided on the Christian camp mentioned in the notes below Table 7.2. Resolved Ensure consistency between ‘rooms’ and ‘beds’ when discussing availability. Resolved	Include clear definitions and consistency in terminology. Provide additional details of the Christian camp mentioned in the notes below Table 7.2. Provide evidence that Wilpinjong	<ul style="list-style-type: none"> Definition of short term and long term provided along with greater clarity regarding use of short-term accommodation (and consistent use of other terms)

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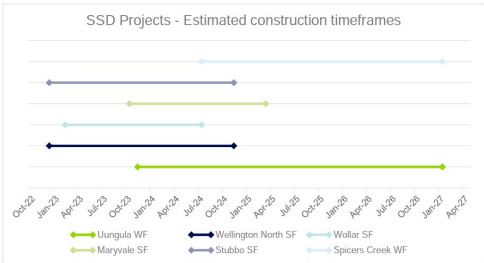
Reviewed: Katie Weekes on 20 June 2023 and 5 July 2023

		<p>No evidence provided that Wilpinjong Mine purchased houses in Wollar Village to accommodate mine workers. Resolved</p> <p>How would care be taken to ensure that prevailing housing stress is not further exacerbated? Resolved.</p> <p>How will the abandoned properties in the vicinity of the project as viable accommodation opportunities be progressed? Resolved</p> <p>Provide clarification around booking/not booking short term accommodation as a mitigation measure. Is it short-term accommodation excluding hotels and motels? Except for consultants and other short-term contractors who can still book hotels and motels? Resolved</p> <p>How does reserving 6 weeks in advance reduce competition for accommodation? Resolved</p> <p>See additional comments in marked-up pdf. Resolved</p>	<p>Mine purchased houses in Wollar Village to accommodate mine workers. How would care be taken to ensure that prevailing housing stress is not further exacerbated? How will the abandoned properties in the vicinity of the project as viable accommodation opportunities be progressed? See additional comments in marked-up pdf of AES. Resolved</p>	<ul style="list-style-type: none"> • The term 'Christian camp' has been amended to 'private camp-style accommodation' as a clearer descriptor. • Wilpinjong Mine statement found from a nearby SF AES - reference removed from Stubbo Solar AES as could not be independently verified. • Additional housing stress mitigation measures provided (Section 7.2.2). • Terminology has been updated from 'abandoned' to 'unoccupied' as this is more accurate descriptor. • Clarified that reserving
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				<p>accommodation would be 'no earlier than 6 weeks in advance' so as not to impede longer term tourism bookings</p> <ul style="list-style-type: none"> • Comments in pdf marked-up by DPE have been addressed.
<p>(b) consider the cumulative impacts associated with other State significant development projects in the area and tourism activity;</p>	<p>Partial Partial</p>	<p>Section 6 addresses this condition. This is taken from the Uungula WF AES (9 June 2023), which shows significant overlap of projects in the region:</p>  <p>Section 7.3 provides a workforce accommodation assessment, including overlap of construction timeframes with Wollar SF.</p> <p>Key points: Figure 7.2, check calculations for room availability against what is presented in Table 7.6. Resolved Check numbers for Stubbo SF estimated non-local workers against figures 6.1 and 7.1. Resolved</p>	<p>Address key points in comments and additional comments in marked-up pdf of AES.</p> <p>Unresolved. Comment on how this risk of overcrowding will be managed. Provide details on how Stubbo and Wollar, and the mines in the area, communicate with each other.</p>	<ul style="list-style-type: none"> • Comments in pdf marked-up by DPE have been addressed. • Calculations for room availability have been checked. • Amended the term 'plentiful' to 'ready supply' as a more accurate descriptor. • Comment provided on Table 7.6 around overlap with Uungula WF construction.

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		<p>What evidence is there to suggest that there is plentiful supply of short-term accommodation in Dubbo and Wellington? Particularly given the potential overlap of construction timing with Ungula WF. Resolved</p> <p>Provide further comment on Table 7.6 around overlap with Ungula WF construction potentially impacting occupancy rates. Confirm there are enough rooms/beds in the Mudgee Gulgong area even with 50% occupancy. Resolved</p> <p>Check numbers, particularly the 60% occupancy total. Resolved</p> <p>Top of page 70, how will the risk of overcrowding by non-local temporary construction workers be managed? Unresolved, no comment on how this risk of overcrowding will be managed.</p> <p>How will Stubbo and Wollar, and the mines in the area, communicate with each other if alternative accommodation is required due to higher than expected occupancy rates? Unresolved, no obvious resolution provided.</p>		<ul style="list-style-type: none"> • Overcrowding mitigation provided - added as an agenda item in Table 11.1. • It is assumed that if higher than expected occupancy rates occur, then MWRC will raise this as an issue in the proposed quarterly meetings with ACEN/PCL and Transgrid and will lead the discussion to address this issue. • Overcrowding: added reference to the expectation that workers will not exceed the licence conditions of the accommodation provider, and that liaison with other projects will be an agenda item in
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				quarterly accommodation update meetings with MWRC.
(c) investigate options for prioritising the employment of local workers for the construction and operation of the development, where feasible; and	Partial Partial	Section 8 and Section 11.2 address this condition. Table ES1 and Table 2.1, update wording for this condition – include 'and' at the end. Resolved Section 8.1.5, employment strategy actions – see comments in the marked-up pdf. Further information is required to describe the actions that are proposed. Unresolved. While Table 8.1 now details responsibilities, very few changes made to address other comments in Section 8.1.5. Who is responsible for these actions? Resolved	Further information is required to describe the actions that are proposed in Section 8.1.5 including who is responsible for these actions. Unresolved. Address comments for dot points in Section 8.1.5.	<ul style="list-style-type: none"> • Actions have been tabulated with responsible parties nominated. no I need some help with re-wording something • Edits have been made in discussion with DPE to address queries and add the required detail. The commitments in relation to training and to education scholarships have been deleted as these initiatives are proposed but not yet implemented for ACEN and PCL projects.
(d) include a program to monitor and review the effectiveness of the strategy over the life of the development, including regular monitoring and review during construction.	Partial Yes	Section 12 addresses monitoring and review processes. The start of this section would benefit from additional subheading(s) for ease of reading. Resolved	Keep processes for review of the AES in the one section. Resolved	<ul style="list-style-type: none"> • Section 12 has been expanded to include review and

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		The monitoring section should have a process for comparing actuals to measurable targets set earlier in the AES. Resolved Reviews of the AES should also be undertaken in accordance with the requirements of Condition 2, Schedule 4. Updating of the AES is addressed in the next subheading (Section 12.1), but this makes for disjointed reading and application in practice. Resolved See comments relating to MWRC requests below.	See comments relating to MWRC requests below.	update commitments in the DC. <ul style="list-style-type: none"> Section 12 now includes a monitoring subsection (Section 12.3) which includes comparing actuals to measurable targets.
Following the Planning Secretary's approval, the Applicant must implement the Accommodation and Employment Strategy.	Yes	Table 11.1 addresses this condition. AES 02 and AES 16 commit to implementing the approved AES throughout the project (during construction). The parties listed as responsible are: Principal (ACEN), EPC Contractor, Site Administrator, Construction Personnel.	-	-
Revision of Strategies, Plans and Programs, Condition 2, Schedule 4	Sufficient (Yes/No/Partial)	Document reference and comment	Action Required	Company Response
The Applicant must:	-	-	-	-
(a) update the strategies, plans or programs required under this consent to the satisfaction of the Planning Secretary prior to carrying out any upgrading or decommissioning activities on site; and	Partial Partial	Section 12.1 addresses this condition. However, the start of Section 12 discusses other reviews of the AES making for disjointed reading and application in practice. Resolved Unresolved . Section 12.2, what purpose-built accommodation? Page 57 states this option will likely not be available for Stubbo SF. Incorporate feedback from external stakeholders into the AES? Clarify.	Keep processes for review of the AES in the one section. Unresolved . Clarify comments in Section 12.2.	<ul style="list-style-type: none"> Section 12 has been expanded to include review and update commitments in the DC and for improved clarity. Reference to purpose-built accommodation removed. Clarification added that the feedback sought

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				from external stakeholders is in relation to the AES and its implementation.
(b) review and, if necessary, revise the strategies, plans or programs required under this consent to the satisfaction of the Planning Secretary within 1 month of the: <ul style="list-style-type: none"> • submission of an incident report under condition 7 of Schedule 4; • submission of an audit report under condition 9 of Schedule 4; or • any modification to the conditions of this consent. 	Yes	Addressed in Section 12.1	-	-
Updating and Staging of Strategies, Plans or Programs, Condition 3, Schedule 4	Sufficient (Yes/No/Partial)	Document reference and comment	Action Required	Company Response
With the approval of the Planning Secretary, the Applicant may submit any strategy, plan or program required by this consent on a progressive basis. To ensure the strategies, plans or programs under the conditions of this consent are updated on a regular basis, the Applicant may at any time submit revised strategies, plans or programs to the Planning Secretary for approval. With the agreement of the Planning Secretary, the Applicant may prepare any revised strategy, plan or program without undertaking consultation with all the parties referred to under the relevant condition of this consent. <i>Notes:</i> <ul style="list-style-type: none"> • While any strategy, plan or program may be submitted on a progressive basis, the Applicant 	Yes	Section 1, staging has been requested under this condition.	-	-

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<p><i>must ensure that all development being carried out on site is covered by suitable strategies, plans or programs at all times.</i></p> <ul style="list-style-type: none"> <i>If the submission of any strategy, plan or program is to be staged, then the relevant strategy, plan or program must clearly describe the specific stage to which the strategy, plan or program applies, the relationship of this stage to any future stages, and the trigger for updating the strategy, plan or program.</i> 				
Access to information, Condition 17, Schedule 4	Sufficient (Yes/No/Partial)	Document reference and comment	Action Required	Company Response
The Applicant must:	-	-	-	-
<p>(a) make the following information publicly available on its website as relevant to the stage of the development:</p> <ul style="list-style-type: none"> the EIS; the final layout plans for the development; current statutory approvals for the development; approved strategies, plans or programs required under the conditions of this consent; the proposed staging plans for the development if the construction, operation or decommissioning of the development is to be staged; how complaints about the development can be made; any independent environmental audit, and the Applicant's response to the recommendations in any audit; and any other matter required by the Planning Secretary; and 	Yes	Section 13 addresses this condition.	-	-
EIS Project Commitments, SIA1	Sufficient (Yes/No/Partial)	Document reference and comment	Action Required	Company Response

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An Accommodation and Employment Strategy will be developed and implemented for the project in consultation with Mid-Western Regional Council. This strategy will:	Yes	This document. Letter of endorsement from MWRC provided in Appendix A.	-	-
• consider various workforce scenarios assuming the construction period overlaps with other major projects and considering peak tourism activity	Partial Yes	Section 6 details potential cumulative impact. Section 7.3 provides a workforce accommodation assessment, including Figure 7.2 with a comparison of cumulative workforce (non-local). See comment in marked up pdf and for Condition 33(b). Resolved	See comment in marked up pdf and for Condition 33(b). Resolved	• Comments in pdf marked-up by DPE have been addressed.
• propose measures to manage workforce accommodation to minimise the effects of non-local hires during construction on short-term accommodation availability and the local housing market	Partial Yes	Section 7 details the accommodation strategy. Section 11.1 details mitigation measures. See comment in marked up pdf and for Condition 33(a). Resolved for this commitment.	See comment in marked up pdf and for Condition 33(a). Resolved	• Comments in pdf marked-up by DPE have been addressed.
• include a code of conduct for the projects workforce, particularly to avoid anti-social behaviour at peak construction and align with Mid-Western Regional Council's existing industry agreements	Yes	Section 10 provides a code of conduct.	-	-
• to the extent possible and within UPCVAC's control, consider the cumulative impacts associated with other State significant development projects in the area, including nearby mines	Partial Yes	Section 6 discussed cumulative impacts, including identify as best as possible overlap with construction of other renewable projects in the area. See comments in marked-up pdf and for Condition 33(b). Resolved for this commitment.	See comments in marked-up pdf and for Condition 33(b). Resolved	• Comments in pdf marked-up by DPE have been addressed.
• investigate options for prioritising the employment of local workers for the construction and operation of the project, where feasible and appropriate given the required skills and experience	Yes	Section 8 contains the employment strategy. This includes the consideration and strategies for prioritising the employment of local workers.	-	-
• include a program to report measures undertaken or implemented in line with the strategy include a program to monitor and review the effectiveness of the strategy over	Partial Yes	Section 12 addresses monitoring and review processes. The start of this section would benefit from additional subheading(s) for ease of reading. Resolved	Keep processes for review of the AES in the one section. See comments relating to MWRC	• Comments in pdf marked-up by DPE have been addressed.

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<p>the life of the project, including regular monitoring and review during construction</p>		<p>The monitoring section should have a process for comparing actuals to measurable targets set earlier in the AES. Resolved Reviews of the AES should also be undertaken in accordance with the requirements of Condition 2, Schedule 4. Updating of the AES is addressed in the next subheading (Section 12.1), but this makes for disjointed reading and application in practice. Resolved See comments relating to MWRC requests below.</p>	<p>requests below. Resolved</p>	<ul style="list-style-type: none"> • A new monitoring subsection has been added (Section 12.3) which includes comparing actuals to measurable targets. • MWRC requests have been incorporated into the AES.
<ul style="list-style-type: none"> • include detailed information regarding the number of beds and types of accommodation to be utilised monthly for the period of construction. 	<p>Partial Partial</p>	<p>Section 7 Table 7.1 provides indicative Stubbo SF non-local workforce accommodation requirements. Figure 7.1 provides indicative number of non-local workers and rooms available. Figure 7.2 provides monthly comparison of cumulative workforce against short-term room availability for non-local workers. See comments in marked-up pdf Unresolved. Table 7.1, see comments in marked up pdf re percentages and data columns for non-local workers. Section 7, some wording and spelling errors. Provide additional detailed on how the risk of overcrowding will be managed.</p>	<p>See comments in marked-up pdf Unresolved. See comments in marked up pdf for Section 7.</p>	<ul style="list-style-type: none"> • Comments in pdf marked-up by DPE have been addressed. • In Table 7.1, percentages shown, percentages and totals checked and amended. No. of non local workers column moved to second last column. • Wording and spelling errors fixed. • Overcrowding: added reference

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				to the expectation that workers will not exceed the licence conditions of the accommodation provider, and that liaison with other projects will be an agenda item in quarterly accommodation update meetings with MWRC.
The strategy will be approved by Mid-Western Regional Council prior to commencement of construction.	Yes	Appendix A, letter of endorsement from MWRC.	-	-
EIS Project Commitments, SIA2	Sufficient (Yes/No/Partial)	Document reference and comment	Action Required	Company Response
UPC\AC will develop initiatives for sharing of benefits with the local community. Funding need will be identified and prioritised based on potential project impacts and in collaboration with the local community centred around Gulgong and surrounds, Mid-Western Regional Council and the NSW Government. Opportunities may include sponsorship, grant assistance, strategic community partnerships or co-ownership schemes.	Yes	This commitment is not listed in Table 2.2. Resolved Some potential funding as part of the employment strategy discussed in Section 8.1.5. Table 11.1, AES 19 funding for secondary level education scholarships and other education and employment pathways programs listed as an action to address skills shortages. Appendix H, Section 4.1.4.2 outlines the ACEN Australia's Social Investment Program.	-	-
EIS Project Commitments, SIA3	Sufficient (Yes/No/Partial)	Document reference and comment	Action Required	Company Response
Investigation will be undertaken into the value of investment in local tertiary training	Yes	Section 4.5, Table 4.6 lists TAFE/college in the LGAs.	-	-

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institutions to address skills shortages where identified during the development of the Accommodation and Employment Strategy. Where value is identified and a strategy is defined, investment will be targeted through the community benefit share fund.		Section 8.5 contains procurement objectives and potential social outcomes. Section 8.6 discusses potential skill shortages issues and discussions with Mudgee TAFE regarding potential training and collaboration opportunities. No discussion of the community benefit share fund, however other potential funding is discussed in the AES.		
EIS Project Commitments, SIA4	Sufficient (Yes/No/Partial)	Document reference and comment	Action Required	Company Response
During development of the Accommodation and Employment Strategy, further consultation with local short-term accommodation providers will be undertaken to identify and where appropriate secure, accommodation for the non-local portion of the construction workforce.	Yes	Appendix B provides a list of appropriate accommodation developed in consultation with accommodation providers.	-	-
EIS Project Commitments, SIA5	Sufficient (Yes/No/Partial)	Document reference and comment	Action Required	Company Response
During development of the Accommodation and Employment Strategy, further consultation with local employment service providers will be undertaken to identify and where appropriate secure, local hires.	Yes	Section 8.1.5 addresses this commitment.	-	-
General Comments			Action Required	Company Response
Section 9, workforce transport impacts. See Section 4.7 of the TMP and comments from TfNSW in relation to peak personnel, light vehicle movements etc. Review Section 9 of AES to ensure consistency across documents.			-	
See comments in marked-up pdf			-	
Update formatting, particularly close brackets and cross-referencing glitches.			-	
Section 5.1.2, duplication of substation and switchyard construction.			Section 5.1.2, resolve duplication.	<ul style="list-style-type: none"> • Duplication removed
Table 7.6 at occupancy rate of 80% has 57 rooms available in Mudgee and 13 in Gulgong. Link this back to the information provided on page 63 that states the outcomes of the phone interviews suggested the general occupancy rate is around 80% or higher.			Provide more information on the data provided in Table 7.6 and dot point on page 63	<ul style="list-style-type: none"> • Table 7.6 caption amended - and footnote added - to make clear

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	(see marked up pdf) regarding occupancy rates.	<p>that the figures in the table are for short-term accommodation.</p> <ul style="list-style-type: none"> • The discussion three paragraphs below table refers back in to accommodation survey results in Section 7.1.2. • Sentence added re-stating commitment not to use short-term accommodation in MWR LGA.
<p>Table 11.1 AES 08, provide additional actions that would be used to encourage sharing. AES 09 what about liaising with other industries (solar/mining) to ensure that tourism accommodation is maintained at sufficient levels? AES 11, ensure consistency with TMP.</p>	Provide additional detail for AES 08 and AES 09 in Table 11.1.	<ul style="list-style-type: none"> • Text added in relation to onboarding procedures to encourage accommodation sharing. • Reference to quarterly accommodation update meetings with MWRC added, plus inclusion of liaison with other projects as an agenda item.

Stubbo Solar Farm – SSD-10452
Post Approval Review



Document: Accommodation and Employment Strategy (AES)
Revision: Version 6 dated 7 June 2023 and Version 7a dated 27 June 2023
Reviewed: Katie Weekes on 20 June 2023 and 5 July 2023

		<ul style="list-style-type: none"> Traffic management actions have been updated for consistency with those set out in the TMP.
Section 12.3, needs some additional information on reporting, Particularly to MWRC.	Include details in Section 12.3 on reporting, particularly to MWRC.	<ul style="list-style-type: none"> Text amended in discussion with DPE to provide additional information on reporting.
Other Agency Comments	Action Required	Company Response
Correspondence from 9 May 2023, MWRC: MWRC requested accommodation options in Kandos and Rylstone be omitted due to the imminent large scale works at Bowden’s Silver Mine	Mentioned in Section 7.2.1. Clarify the relevance of Appendix F to this sentence. It is unclear who is talking in the extract from the IPC hearing in Appendix F. Is there a specific commitment in the AES to not look to Kandos and Rylstone for worker accommodation? Resolved	<ul style="list-style-type: none"> Kandos and Rylstone omitted as explained by text added to Section 7.2.1.
From the MWRC letter of endorsement, 5 June 2023:	-	-

**Stubbo Solar Farm – SSD-10452
Post Approval Review**



Document: Accommodation and Employment Strategy (AES)

Revision: Version 6 dated 7 June 2023 and Version 7a dated 27 June 2023

Reviewed: Katie Weekes on 20 June 2023 and 5 July 2023

Endorsement is with the expectation that ACEN Australia diligently adheres to the strategy in all aspects.	Addressed in Table 11.1, AES 02 and AES 16.	-
Should any modifications or adjustments be required to the strategy in the future, Council requests that ACEN Australian to communicate with Council promptly.	Section 12 includes incorporating feedback from MWRC into the AES. The AES should specifically reference this request from MWRC in Section 12. Resolved	<ul style="list-style-type: none"> This commitment has been added to Section 12.
We specifically note that ACEN Australia is committed to not booking tourist hotels or motels in the MWRC LGA	Does this preclude the use for short-term contractors and consultants as mentioned in the AES? Resolved	<ul style="list-style-type: none"> No, this does not preclude the use of hotels or motels by the EPC team during short-term visits (up to approximately 1 week)
ACEN Australia will continue to liaise with Council and accommodation providers regarding major events and other key activities where accommodation is required for visitors.	Table 11.1, AES 09 (and others). Commit to this requirement as an action. Resolved	<ul style="list-style-type: none"> Covered by agenda for quarterly meetings between MWRC, ACEN, PCL and Transgrid
To preserve short-term accommodation stock for tourism demand, Stubbo Solar workers will reserve accommodation up to six weeks before it is required.	Clarity is required in the AES around the definition of short, medium and long term accommodation as	<ul style="list-style-type: none"> Short- and long-term accommodation have been defined (under 'Accommodation

Stubbo Solar Farm – SSD-10452
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	<p>there is some confusion around type and length of stay. Acknowledge there is a definition provided in Section 7.2. Resolved</p> <p>Clarity is also required around what type of accommodation is being booked up to six weeks before it is required. Resolved</p>	<p>strategy in Exec Summ, and in Section 7.1.2).</p> <ul style="list-style-type: none"> • For greater clarity, 'medium-term' accommodation is no longer used. • The 'no earlier than six week' requirement applies to short-term accommodation, such as may be used by tourists.
<p>If accommodation availability levels in the Mudgee-Gulgong district during peak construction periods are significantly lower than currently being reports and forecast in V5 of the AES, ACEN Australia will work with MWRC and local landholders to consider temporary accommodation options, such as caravan sites, on local private properties (subject to compliance with relevant planning conditions).</p>	<p>Partially addressed on pages 59/60. AES seems to be looking at further afield options should availability in Mudgee and Gulgong be significantly lower than forecast. Resolved</p>	<p>-</p>
<p>As a further option, if required, ACEN Australia will work with PCL Construction and TransGrid to source accommodation options in Wellington, Dunedoo and Dubbo. Council advises ACEN Australia needs to discuss this accommodation strategy with Warrumbungle Shire Council and Dubbo Regional Council, as there are major SSD projects and tourism related activities in Dubbo LGA.</p>	<p>These options are detailed, however, there is no evidence of discussions with other councils. Should this eventuate, commit</p>	<ul style="list-style-type: none"> • Commitment made in Section 4.7, but only if the use of accommodation in DR and WS LGAs is unavoidable.

Stubbo Solar Farm – SSD-10452
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	to having discussions with these councils. Resolved	
Quarterly review meetings will be held between ACEN Australia and MWRC to review the AES. Council requests ACEN Australia supply Council with information reporting current accommodation types utilised and projects at these meetings commencing July 2023.	Table 11.1 refers to quarterly reporting with MWRC as a recipient. Include minutes of quarterly meetings with MWRC as evidence/ compliance record. Section 12 mentions reporting quarterly review outcomes to MWRC and continual engagement. Needs to specifically commit to quarterly review meetings commencing in July 2023. Resolved, Table 11.1 AES 06	<ul style="list-style-type: none"> • Commitment to quarterly review meetings commencing in July 2023 made in Table 11.1.



Appendix H:
ACEN Draft Industry and
Aboriginal Participation Plan
(IAPP)

Industry and Aboriginal Participation Plan
Stubbo Solar



ACEN Australia
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1 Overview

As NSW embraces the opportunities a growing renewable energy industry brings, ACEN Australia understands the importance of social participation so that the benefits associated with our projects are shared with regional and Indigenous communities.

We believe that benefit sharing goes beyond making cash-based contributions, and towards partnerships and investments that address societal priorities, helping to build thriving and resilient communities. While each community is unique, our experience tells us that social participation must take place throughout the full project lifecycle so that regional and Indigenous communities can actively participate in the benefits that Australia's growing renewable energy industry can provide.

Built on a foundation of trust and shared value, ACEN Australia seeks to develop long term relationships with communities that create enduring and positive impact. In doing so, we encourage social participation in our activities through procurement, employment and training streams.

Recognising ACEN Australia's journey towards providing meaningful opportunities for social participation in its projects, this plan outlines the business's approach, our track record and commitment to future activities.

ACEN Australia commits to undertaking activities that demonstrate best endeavours to meet baseline targets and this is reflected in Objective 3 of this plan (Section 3). Based on performance reporting, targets will be reviewed throughout the life of the LTESA to ensure they are reflective of market and industry data

Summary of ACEN Australia targets (for solar only)

Project Phase	Activity	% of Total Project Contract Value procured locally (AUS & NZ)	Cost in A\$ or workforce numbers	Description of procurement	% of Total Project Contract Value procured in NSW	Description of Procurement
Before COD	Local content	49%	\$392M	ACEN Australia commits to taking a best endeavours approach to meeting baseline targets; however, this will be dependent on level of local manufacturing capability and competitiveness in pricing for the specific components (noting this is likely to be in supporting infrastructure rather than panels in the time frame relevant to this project.	0.05% of Total Project Value	It is ACEN's intention is to take advantage of steel and other renewable infrastructure produced and/or assembled in NSW wherever possible, recognising the NSW Government's intention to boost steel production in the state. However, this will be dependent on level of local manufacturing capability and competitiveness in pricing for the specific components (noting this is likely to be in supporting infrastructure rather than panels in the time frame relevant to this project.
Steel products and components used locally milled steel	Local content	95%	\$760M	As above	20% of project workforce	As Above
During Operation and Maintenance	Local content	71%	\$568M	As above	20% of trades positions	As above
Both phases	Investment in supply chain innovation	0.05% of Total Project Value	\$4M		1.5%	
Both phases (noting only 10 FTE required during	Employment skills and	20% of project workforce	82 apprentices and trainees combined		15% of workers	

operations and 300 during construction)	knowledge transfer					
	Employment skills and knowledge transfer	20% of trades positions	13 Apprentices			
Both phases	First nations participation	1.5%	\$12M 6FTEs	One or a combination of: <ul style="list-style-type: none"> • Goods and services • Employment • Investment in training 		
Both phases	Fair and ethical practice	15% of workers	61			

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The following risks have been identified in relation to the achievement (or exceedance) of baseline targets based on ACEN Australia’s knowledge base and experience.

- Current capacity and capability of Australian and New Zealand supply chain providers and SMEs to participate
- Projected demand on Australian and New Zealand supply chain and SMEs from a growing renewable energy industry in the Central West Orana REZ
- Potential for change in market and industry conditions, and socio-economic profile of communities over the duration of the LTESA contract

2 Project description

The Stubbo Solar and Battery Project (Stubbo Solar/ the Project) is a 400megawatt (MW) solar project with 200 MW / 200 MW-hour (MWh) of battery storage located approximately 10 kilometres (km) north of Gulgong in the Central West and Orana (CWO) Region of NSW.

The project is classified as State Significant Development under the Environmental Planning and Assessment Act 1979 (EP&A Act) as it’s development is for the purpose of electricity generating works with a capital investment value of more than \$30 million.



3 Objectives

The objectives of this plan are outlined below:

1. Prioritise the procurement of goods and services from regional and Indigenous businesses, and social enterprises
2. Provide workforce participation opportunities for regional, Indigenous and minority groups through employment and training streams, supporting the development of a skilled local workforce with sustainable career paths in the renewable energy sector
3. Support supply chain development by prioritising the procurement of goods from Australian and New Zealand suppliers, the procurement of environmentally sustainable goods and services and invest in innovation
4. Social investments contribute to building thriving and resilient communities and economies
5. The project is constructed and operates ethically and safely

6. Our relationships and commitments are long term, integrated into whole-of-business processes and full project life-cycle
7. We are guided by government, industry and global standards including the [Clean Energy Council best Practice Charter](#) and the [United Nations Sustainable Development Goals](#)

4 Our Approach

At ACEN Australia, we undertake our activities in accordance with a number of guidance frameworks, systems and documents. These provide a systematic, risk-based approach to undertaking engagement and social participation activities across the business.

Our approach to maximising opportunities for social participation is centred on the following approach:



4.1 Local supply chain development

4.1.1 Targets

ACEN Australia commits to undertaking activities that demonstrate best endeavours to meet baseline targets and this is reflected in Objective 3 of this plan (Section 3). Based on performance reporting, targets will be reviewed throughout the life of the LTESA to ensure they are reflective of market and industry data.

Inputs	Baseline target
Development Phase	49%
O&M phase	71%
Steel product components using locally milled steel	95%

4.1.2 Risks to achieving targets

The following risks have been identified in relation to the achievement (or exceedance) of baseline targets based on ACEN Australia’s knowledge base and experience.

- Current capacity and capability of Australian and New Zealand supply chain providers to participate
- Projected demand on Australian and New Zealand supply chain from a growing renewable energy industry in the Central West Orana REZ
- Potential for change in market and industry conditions, and socio-economic profile of communities over the duration of the LTESA contract

4.1.3 Key activities

Below lists activities of which ACEN Australia is either already undertaking or plans to undertake in the future as part of best endeavours to meet baseline targets.

- Specify targets and regular reporting in EPC tenders and contracts
- In accordance with the NSW Government Development Consent conditions for Stubbo Solar issued in 2021, an Australian Industry Participation Plan (AIPP) has been submitted and awaiting approval by the Australian Government
- Unbundling large work packages to match market capability and enable greater flexibility for SMEs to respond
- Provision for tender evaluation criteria and weightings that prioritise SME participation
- Specify minimum number of quotes from SMEs
- Advertise and market widely to ensure local suppliers have visibility over opportunities
- Establishment of an online registration portal for SMEs to register their interest
- Hosting of supplier forums to encourage participation. Forums to include information such as expected tender release dates, guidance on how to submit tenders, overview of key evaluation criteria, minimum pre-qualification standards
- Provisions to provide meaningful feedback to SMEs who submit unsuccessful tenders providing information and opportunity for development of capability and long term participation
- Engagement and partnerships with government and industry providers to promote SME capability development

4.1.4 Investment and innovation

4.1.4.1 Targets

Noting current constraints in relation to the capacity and capability of Australian and New Zealand supply chain providers to participate, ACEN Australia acknowledges its role and the value of innovative investment towards helping the industry maximise opportunities for SME participation.

Project stage	LTESA requirement	ACEN Australia target
CAPEX (Construction period)	One or a combination of: <ul style="list-style-type: none"> % of Project value in new/local facilities % of Project value invested in innovation of supply chain 	1% of project expenditure* *Project expenditure excludes goods and services that are not available domestically or locally.
OPEX (Operations period)	<ul style="list-style-type: none"> Contributions to or participation in pooled investment 	1% of project expenditure* *Project expenditure excludes goods and services that are not available domestically or locally.

4.1.4.2 Key activities

ACEN Australia will work with the selected EPC contractor to determine suitable opportunities to support this investment. Below however lists current known activities of which ACEN Australia is either already undertaking or plans to undertake in the future to support investment, innovation, and commercialisation in the supply chain.

ACEN Australia’s Social Investment Program

ACEN Australia has in place a Social Investment Program (SIP) that aims to provide funding for initiatives and partnerships that contribute to building thriving and resilient communities and economies. Preference for funding is given to activities that deliver benefits in at least one of ACEN’s value areas (outlined below). Our approach to social investment is also aligned with the United Nation’s Sustainable Development Goals.

ACEN value	Focus	UN SDG
Community enhancement and resilience	Activities that enhance communal lives, cohesion, and resilience through improved access to technologies and economic opportunities.	 
Education and work	Activities that provide or enhance education, training and employment resources and opportunities.	 

Reconciliation	Activities that address Indigenous disadvantage, promote shared understanding, and respect for culture, and promote reconciliation.	
Environment	Activities that support communities to improve environmental resilience and stewardship.	  

Funding and investments are made in accordance with the following criteria:

Criteria	Detail
Community	<ul style="list-style-type: none"> The activity directly benefits the community (in at least one of ACEN Australia’s Social Investment value areas).
Sustainability	<ul style="list-style-type: none"> The activity has good prospects of successful implementation and any long-term costs and maintenance have been planned for Where possible, other fundraising efforts or contributions from other funding providers have been secured
Risk	<ul style="list-style-type: none"> Any risks associated with the activity have been considered The activity aligns with ACEN Australia’s Vision Mission and Values
Equity and inclusion	<ul style="list-style-type: none"> Funding is accessible to a diverse range of groups and people and will not support initiatives that discriminate or disadvantage groups within the community

Initial seed funding of \$50,000 was committed to during the development stage of the Stubbo Solar project, with additional funding to be committed during the construction period. Funding will continue to be administered in accordance with the above mentioned SIP guidelines and criteria.

Other activities that contribute to investment in innovation

- Funding for a Micro-credentialling programs that offer short-course training outcomes to meet regional skills shortage and provide pathways to longer term economic participation
- Voluntary Planning Agreement (VPA) with Mid-Western Regional Council to be used to fund specific community projects determined by Planning Authority in accordance with the priorities identified in the Mid-Western Region Community Plan and the Delivery Program of Council for the Mid-Western Region (Mid-Western Region Community Plan and Delivery Program). The value of the VPA is:
 - a one-off payment of \$100,000 (exclusive of GST) (Construction Contribution) to the Planning Authority, paid in two equal instalments; and

- an annual contribution (Annual Development Contribution), being \$300 per megawatt based on the final installed capacity of the Development over the operational life of the Development. The amount of the Annual Development Contribution will be adjusted for inflation on a yearly basis.
- Engagement and partnerships with government and industry providers to promote SME capability development
- In accordance with the NSW Government Development Consent conditions for Stubbo Solar issued in 2021, an Australian Industry Participation Plan (AIPP) has been submitted and awaiting approval by the Australian Government

4.1.4.3 Our track record

ACEN Australia is currently constructing the New England Solar project in NSW's New England REZ. Below highlights activities being undertaken at New England Solar demonstrating ACEN Australia's support for investment, innovation, and commercialisation in the supply chain.

- For ACEN Australia's expenditure to date on New England Solar, expenditure with:
 - Local businesses is \$158,000
 - Indigenous businesses is \$71,000

These figures do not include expenditure with local and Indigenous businesses by the project's EPC contracting partner. This expenditure is currently unavailable but it is anticipated that with this data, the true expenditure with local and Indigenous businesses would be more. Additionally, added procurement and processes and EPC contractor requirements are proposed to be put in place for New England Stage 2 that explicitly priorities local and Indigenous business participation.

Additionally, when referring to local, ACEN Australia has applied a definition of a business of any size with a registered address, or can demonstrate that the business has substantial operations including a local workforce in the New England region.

- Exploration of a potential partnership with a University on a study into the benefits of solar panel installations on sheep grazing land
- Awarding of a project contract to a local Indigenous business, enabling the business to expand its workforce through the appointment of two additional Indigenous trainees to deliver works in the region
- Delivery of monthly cultural awareness sessions by local First Nations groups for the project construction workforce providing an increased revenue stream for Aboriginal groups

4.2 Employment and workforce development

4.2.1 Key targets

ACEN Australia commits to undertaking activities that demonstrate best endeavours to meet baseline targets and this is reflected in Objective 2 of this plan (Section 3). Based on performance reporting, targets will be reviewed throughout the life of the LTESA to ensure they are reflective of community needs, priorities and relevant socio-economic data.

Inputs	Baseline target
Learning Workers	20% of project workforce
Apprentices	20% of trades Workforce

4.2.2 Risks to achieving targets

The following risks have been identified in relation to the achievement (or exceedance) of baseline targets based on ACEN Australia’s knowledge base and experience.

- Current capacity and capability of skilled Australian workforce to participate
- Projected demand for Australian skilled workforce to participate in a growing renewable energy industry in the Central West Orana REZ
- Socio-economic profiles of regional communities over the duration of the LTESA contract

4.2.3 Key activities

Below lists activities of which ACEN Australia is either already undertaking or plans to undertake in the future as part of best endeavours to meet baseline targets.

- Specify targets and regular reporting in EPC tenders and contracts
- Embed assessment criteria into contract evaluation process
- In accordance with the NSW Government Development Consent conditions for Stubbo Solar issued in 2021, an Accommodation and Employment Strategy is currently being prepared
- Identification of suitable roles required for the project and skills required for these roles
- Targeted recruitment campaigns
- Initiatives to facilitate the transition from training to long term employment for participants
- Identify government and industry providers, not for profits, for partnerships to promote participation in employment and job readiness activities and source trainees
- Funding micro-credentialling programs that offer short-course training outcomes to meet regional skills shortages and provide pathways to longer term economic participation.
- Develop a specific job readiness program with selected employment agencies to identify suitable candidates and receive applications for advertised roles.
- Funding for secondary level education scholarships and other education and employment pathways programs
- Work experience programs for secondary education students
- Participation in industry forums and events aimed at generating interest for secondary students to pursue a career in renewable energy

4.2.4 Our track record

The below highlights activities being undertaken by ACEN Australia across other projects in NSW and Tasmania, demonstrating our commitment to employment, skills and knowledge transfer.

- Reporting data from ACEN Australia’s EPC contracting partner on local employment indicates 80% of the project’s construction workforce is being sourced from the New England region.
When referring to local, ACEN Australia has applied a definition of an employee or business of any size with a registered address, or can demonstrate that the business has substantial operations including a local workforce in the New England region.
- Collaborating with the Tasmanian Government and industry on the potential development of the state’s first state-wide training program to develop a new generation of skilled technicians to support Tasmania’s growing renewable energy industry
- Annual sponsorship for a secondary level student in Tasmania to pursue a Certificate II in Electro-technology. In addition, upon satisfactory continuation of their training pathway, an invitation to visit ACEN Australia’s New England Solar project to experience first-hand, the construction and operation of a large utility scale solar project
- Awarding of a project contract to a local Indigenous business, enabling the business to expand its workforce through the appointment of two additional Indigenous trainees to deliver works in the region
- Hosting university students at the New England Solar project site to experience firsthand, the construction and operation of a large utility scale solar project

4.3 First Nations participation

4.3.1 Targets

ACEN Australia commits to undertaking activities that demonstrate best endeavours to meet baseline targets and this is reflected in Objectives 1, 2 and 5 of this plan (Section 3). Based on performance reporting, the target will be reviewed throughout the life of the LTESA to ensure its reflective of community needs, priorities and relevant socio-economic data.

Inputs	Target
First Nations Participation	<p style="text-align: center;">1.5%*</p> <p style="text-align: center;">*Project expenditure excludes goods and services that are not available domestically or locally.</p>

Made up of one or a combination of:

- At least 1.5% of the contract value to be subcontracted to Aboriginal-owned businesses
- At least 1.5% of the contract’s Australian-based workforce (FTE) that directly contributes to the contract to be Aboriginal or Torres Strait Islander peoples
- At least 1.5% of the contract value to be applied to the cost of education, training or capacity building for Aboriginal staff or businesses directly contributing to the contract.

Our approach to First Nations engagement and participation is guided by:

- NSW Government First Nations Guidelines

- Clean Energy Council Best Practice Charter
- ACEN Australia's Social Participation and Communications Policy
- ACEN Australia's Reflect Reconciliation Action Plan (in draft)
- ACEN Australia business values
- The Project's Aboriginal and Cultural Heritage and Historic Heritage Assessment Report
- The Project's Aboriginal Cultural Heritage Management Plan (in draft)

Engagement and participation will:

- Take place throughout full project lifecycle – development, construction and operations
- Provide meaningful opportunities for Aboriginal groups to economically participate in the project through procurement, employment and training streams
- Be adequately resourced at project construction and operations for ongoing implementation and monitoring of Management Plan commitments

Aboriginal partners and stakeholders we are already engaging with:

- The project's eight Registered Aboriginal Parties (RAPs), in accordance with Heritage NSW
- Mudgee Local Aboriginal Land Council (LALC)
- Central West Orana REZ First Nations Working Group
- NSW Indigenous Chamber of Commerce
- Supply Nation
- Aboriginal Employment Services

Known opportunities for Aboriginal participation

Taking our current knowledge base and engagement with Aboriginal groups so far, the following goods, services and roles offer potential to opportunities for Aboriginal participation in the project.

- Accommodation and facilities management
- Landscaping and grounds maintenance
- Environmental monitoring
- Signage
- Fencing
- Cultural heritage survey and monitoring
- Cleaning
- Document control
- Machine Operators
- Haulage and transportation
- Labourers
- Warehousing and logistics
- Trades Assistants
- Administrative and support services
- Leading Hands
- Traffic control
- Pest control
- Vehicle fleet management and maintenance
- Security services
- Diesel and water supply
- Waste and recycling services
- Printing and distribution services
- Catering

4.3.2 Risks to achieving target

The following risks have been identified in relation to the achievement (or exceedance) of baseline targets based on ACEN Australia’s knowledge base and experience.

- Current capacity and capability of Indigenous people to participate
- Projected demand for First Nations to participate in a growing renewable energy industry in the Central West Orana REZ
- Socio-economic profiles of regional communities over the duration of the LTESA contract

4.3.3 Key Activities

Below lists activities of which ACEN Australia is either already undertaking or plans to undertake in the future as part of best endeavours to meet baseline targets.

Reconciliation Action Plan

In 2022, ACEN Australia started the process of developing its first national *Reflect* Reconciliation Action Plan (RAP). This marks the start of our journey to take meaningful actions to provide opportunities for Aboriginal people to actively participate in our renewable energy projects, and to share in the benefits that Australia’s growing renewable energy industry offers. ACEN Australia has opted to develop its Reflect RAP by co-design with its Aboriginal partners. This process calls for extensive consultation with is taking place currently. We plan to submit the draft RAP for endorsement by Reconciliation Australia in 2023.

Aboriginal Participation Plan

Central to ACEN Australia’s activities will be the submission of an Aboriginal Participation Plan, consistent with the First Nations Guidelines and template. Drafting of this plan has commenced in consultation with relevant Aboriginal partners and stakeholders.

Once the plan is executed, ACEN Australia commits to regular, ongoing consultation with Aboriginal representative groups to ensure the Participation Plan is reflective of aspirations, that they endorse the initiatives to deliver the plan, provide feedback, and monitor compliance

Other activities

- Specify targets and regular reporting in EPC tenders and contracts
- Embed assessment criteria into contract evaluation process
- Unbundling large work packages to match market capability and enable greater flexibility for Indigenous businesses to respond
- Provision for tender evaluation criteria and weightings that prioritise Indigenous business participation
- Specify minimum number of quotes from Indigenous businesses
- Advertise and market widely to ensure Indigenous businesses have visibility over opportunities
- Establishment of an online registration portal for Indigenous businesses to register their interest
- Methods to verify Aboriginal owned businesses
- Hosting of supplier forums to encourage participation. Forums to include information such as expected tender release dates, guidance on how to submit tenders, overview of key evaluation criteria, minimum pre-qualification standards
- Provisions to provide meaningful feedback to Indigenous businesses who submit unsuccessful tenders providing information and opportunity for development of capability and long-term participation
- Leverage Aboriginal group training and recruitment organisations to provide a range of workforce solutions, personnel services and supports to employees
- Identification of suitable roles required for the project and skills required for these roles
- Targeted recruitment campaigns
- Initiatives to facilitate the transition from training to long term employment for participants
- Identify government and industry providers, not for profits, for partnerships to promote participation in employment and job readiness activities and source trainees
- Funding micro-credentialling programs that offer short-course training outcomes to meet regional skills shortages and provide pathways to longer term economic participation.
- Develop a specific job readiness program with selected employment agencies to identify suitable candidates and receive applications for advertised roles.
- Funding for secondary level education scholarships and other education and employment pathways programs
- Work experience programs for secondary education students
- Participation in industry forums and events aimed at generating interest for secondary students to pursue a career in renewable energy
- Mechanisms to provide a supporting and culturally safe workplace environment, including diversity and inclusion training, and unconscious bias training for all employees and contractors to promote a supportive and safe workplace environment.

4.3.4 Our track record

While the majority of our projects are still in development phase, New England Solar in NSW is now in construction, allowing the project's Registered Aboriginal Parties (RAPs) to commence

the realization of their aspirations set out in the project’s cultural heritage management plan. Activities undertaken together with the RAPs so far include:

- Agreement to establish access tracks to a cultural significant site located within the project areas so that Aboriginal people can access it in a safe and controlled way once the solar farm is operational
- Awarding of a project contract to a local Indigenous business, enabling the business to expand its workforce through the appointment of two additional Indigenous trainees to deliver the works
- Delivery of scheduled cultural awareness sessions by local First Nations groups for the project construction workforce as part of mandatory site induction activities
- Recording of cultural stories by local First Nations. Recently, First Nations representatives kindly shared their cultural stories on film, and at their request a short film has been made to capture these stories for sharing to help build cultural knowledge and awareness for all. This film is available for viewing here <https://newenglandsolar.com.au/community/>

ACEN Australia’s expenditure so far on New England Solar with Indigenous businesses is \$71,000.

These figures do not include expenditure with local and Indigenous businesses by the project’s EPC contracting partner. This expenditure is not currently being tracked by the project’s EPC contracting partner, but it is anticipated that with this data, the true expenditure with Indigenous businesses would be more. Additionally, added procurement processes and EPC contractor requirements are proposed to be put in place for New England Stage 2 and Stubbo Solar that explicitly priorities Indigenous business participation. Similarly, Indigenous employment and training participation reporting data is not currently being tracked by the project’s EPC contracting partner. Added employment processes and EPC contractor requirements are proposed to be put in place for New England Stage 2 that explicitly priorities Indigenous participation.

4.4 Fair and ethical practice

ACEN Australia commits to undertaking activities that demonstrate best endeavours to meet baseline target and this is reflected in Objectives 1, 2 and 5 of this plan (Section 3). Based on performance reporting, the target will be reviewed throughout the life of the LTESA to ensure its reflective of community needs, priorities and relevant socio-economic data.

Inputs	Target
Employment of underrepresented groups	15% of workforce
Includes women, members of racial or ethnic minority groups, Aboriginal and Torres Strait Islander peoples, people with a disability, long-term unemployed and young people.	

Our approach to diversity and inclusion is guided by:

- ACEN Australia Diversity and Inclusion Statement
- ACEN Australia's Social Participation and Communications Policy
- NSW Government First Nations Guidelines
- Clean Energy Council Best Practice Charter
- ACEN Australia's Reflect Reconciliation Action Plan (in draft)
- ACEN Australia business values

4.4.1 Key activities

- Specify targets and regular reporting in EPC tenders and contracts
- Embed assessment criteria into contract evaluation process
- Unbundling large work packages to match market capability and enable greater flexibility for SMEs to respond
- Provision for tender evaluation criteria and weightings that prioritise SME participation
- Specify minimum number of quotes from SMEs
- Advertise and market widely to ensure Indigenous businesses have visibility over opportunities
- Establishment of an online registration portal for Indigenous businesses to register their interest
- Hosting of supplier forums to encourage participation. Forums to include information such as expected tender release dates, guidance on how to submit tenders, overview of key evaluation criteria, minimum pre-qualification standards
- Provisions to provide meaningful feedback to SMEs who submit unsuccessful tenders providing information and opportunity for development of capability and long term participation
- Leverage group training and recruitment organisations to provide a range of workforce solutions, personnel services and supports to employees
- Identification of suitable roles required for the project and skills required for these roles
- Targeted recruitment campaigns
- Initiatives to facilitate the transition from training to long term employment for participants
- Identify government and industry providers, not for profits, for partnerships to promote participation in employment and job readiness activities and source trainees
- Funding micro-credentialling programs that offer short-course training outcomes to meet regional skills shortages and provide pathways to longer term economic participation.
- Develop a specific job readiness program with selected employment agencies to identify suitable candidates and receive applications for advertised roles.
- Funding for secondary level education scholarships and other education and employment pathways programs
- Work experience programs for secondary education students
- Participation in industry forums and events aimed at generating interest for secondary students to pursue a career in renewable energy
- Mechanisms to provide a supportive and safe workplace environment, including diversity and inclusion training, and unconscious bias training for all employees and contractors to promote a supportive and safe workplace environment.

4.5 Commitments to environmentally sustainable procurement in the supply chain

ACEN Australia commits to undertaking activities that demonstrate best endeavours to procure goods and services that offer environmentally sustainable outcomes.

4.5.1 Key activities

Drought proofing

Of significant importance to stakeholders and communities in the region are efforts to reduce water usage in an effort to 'drought proof' the region. A potential avenue identified in the early phase of the Stubbo Solar project is to investigate the use of treated recycled effluent as its base water source for purposes of civil construction. This is still in its early stages of investigation.

Other activities

- Embed sustainable procurement requirements in EPC contracts
- Embed assessment criteria into contract evaluation process
- Deployment of Integrated Environmental Management (EMS) system consistent with ISO 14001
- As part of the EMS, aim to source products and materials that align with EN15804, and/or is recognised by the Green Building Council of Australia's Responsible Products Framework.
- As part of the EMS, reduce either directly or indirectly through our EPC contractor our construction and operational carbon footprints and promote low carbon solutions that align with the NSW Government's Net Zero by 2050 target, including:
 - Minimising embodied emissions energy in project delivery and logistics minimising use of water and increasing use of non-potable water.
 - Ensure project activities align with Circular Economy Policies including, regarding the use of recycled content, reducing waste to landfill and maximising products that can be reused, repaired and recycled.

4.5.2 Our track record

ACEN Australia is currently constructing the New England Solar project in NSW's New England REZ. Below highlights activities being undertaken at New England Solar demonstrating ACEN Australia's commitment to procuring goods and services where possible that provide environmentally sustainable outcomes.

- Execution of PV panel supply contract with a supplier that offered reduced plastic waste associated with product transportation
- Commitment to support the upgrade of local council waste recycling facility to assist in handling waste materials associated with the construction of the solar project (note, this initiative is yet to be executed with local council)

5 Performance monitoring

Based on performance reporting, targets will be reviewed throughout the life of the LTESA to ensure they are reflective of community needs, priorities and relevant socio-economic data.

A series of registers will be maintained by the EPC contractor and ACEN Australia to support reporting requirements. Examples of these registers and the information they would include are listed below.

Area	Example reporting information to be captured	Relevant IAPP objective
Employment and training register	To monitor and report on compliance against: <ul style="list-style-type: none"> Recruitment and employment Training and skills development activities 	Objective 1 Objective 2 Objective 5 Objective 6 Objective 7
Procurement register	To monitor and report on compliance against: <ul style="list-style-type: none"> Tenders released and awarded Activities to develop supply chain capability and capacity 	Objective 1 Objective 3 Objective 5 Objective 6 Objective 7
Stakeholder register	Assessment of stakeholders who may be impacted, or have an interest in the project. The register is to include contact details, an assessment of stakeholder interest and influence and is to be reviewed every six months.	Objective 6
Stakeholder and community interactions register	A record of all formal and informal interactions with stakeholders and community. Interactions that are required to be captured include interactions involving commitments with stakeholders such as government, landowners and Aboriginal groups for example. The register will: <ul style="list-style-type: none"> Record interactions that involve commitments Be used to monitor stakeholder sentiment towards projects and activities Provide visibility on issues and trends over time to support reporting requirements 	Objective 1 Objective 2 Objective 4 Objective 6
Social risk register	To assess risks against likelihood and consequences, and have assigned ownership and actions to manage them. The register is to be reviewed monthly and integrated into broader project level risk management processes. Social risk includes actual or perceived risks that can result in unfavourable outcomes for the business or project. Generally, they are classified under:	Objective 5

	<ul style="list-style-type: none"> • Risk to reputation • Risk to stakeholder relationships 	
Complaints and feedback register	<p>A register of complaints and feedback from community and stakeholders will be maintained. Management of complaints and feedback captures stakeholder sentiment and opinion of the project and provides opportunity for issues to be resolved, before escalating. Key to the process is ensuring interactions are recorded and actions are assigned to resolve matters.</p> <p>The process will:</p> <ul style="list-style-type: none"> • Be used to ensure interactions are recorded and actions are assigned to resolve matters • Be used to monitor sentiment towards projects and activities 	Objective 5 Objective 6 Objective 7
Social Investment Program (SIP) register	Summary of any discretionary community investments made, including funding recipient, amount, purpose and date	Objective 4 Objective 7

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6 Appendices

6.1 ACEN Australia's Social Participation and Communications Policy

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Social Participation and Communications Policy

Built on a foundation of trust and shared value, ACEN Australia seeks to develop relationships with communities that create enduring and positive impact.

How we do this:

1. Engage early and often, and listen to the full range of community views, including those from minority groups
2. Communications about our business and activities is transparent
3. Understand and value the diversity of Aboriginal and Torres Strait Islander and non-Indigenous cultures, rights, experiences and heritage as an integral part of our shared Australian identity
4. Encourage social participation in our activities through procurement, employment and training streams
5. Social investments contribute to building thriving and resilient communities and economies
6. Relationships and commitments are long term, integrated into whole-of-business processes and full project life-cycle
7. Be guided by industry and global standards including the [Clean Energy Council Best Practice Charter](#) and the [United Nations Sustainable Development Goals](#)
8. Integrate activities into full project life-cycle and business systems to monitor, measure and report on our performance



Anton Rohner
CEO
ACEN Australia
December 2021

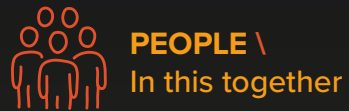
6.2 ACEN Australia business values

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Our vision

We believe in a more sustainable, inclusive and resilient world where we all have access to affordable renewable energy.

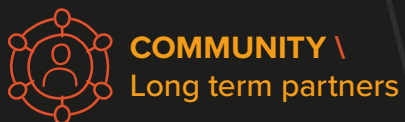
Our values



We care about what we do, how we do it, and we genuinely care about each other.

- We care about safety, health and wellbeing.**
- We work collaboratively, inclusively and respectfully.**
- We value growth and learning.**

We love working to each other's strengths and bringing our collective expertise to bear on the problems we face. We are all in this together and that makes the difference, individually and together.



We want to make a collaborative, enduring and positive contribution in communities where we work.

- We act with integrity.**
- Landholders and community hosts are at the heart of what we do.**
- We respect our shared heritage, cultures and future.**

We believe in what is possible and are excited to be a part of the future we are building together.

Our values

Our mission

To meaningfully reduce emissions and accelerate Australia's transition to a renewable energy future.

To be a valued leading provider of renewable energy solutions to the market and our customers.

To develop, build and operate environmentally responsible and sustainable energy projects in Australia.



We are all stewards of the future and have a responsibility now to minimise our overall impact on the natural environment in everything we do.

- We care about our environment.**
- We want to provide a net benefit to the environment through our projects.**
- We are here for the long term.**

We love our planet and are passionate, patient and persistent because we know that together, we can make a significant contribution towards a healthy 100% renewables future. That is big to us, exciting, and worth it.



We are pushing the boundaries of traditional industry thinking and pioneering modern projects for modern energy needs. We want to make a positive and enduring impact.

- We are solution focused.**
- We value quality and diligence in everything we do.**
- We have an open and collaborative mindset.**

We want to be an authentic force for positive change in the industry. We are here to make a difference.

6.3 ACEN Australia Diversity and Inclusion Statement

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Diversity and Inclusion Statement

1. What is Diversity and Inclusion?

The Diversity Council of Australia describes diversity and inclusion as follows:

Diversity is the mix of people in our organisation and all the ways we differ. For example, age, gender, cultural background, language, disability, education, profession and so-on.

Inclusion is about getting this mix to work. Inclusion occurs when a diverse range of people is respected, connected, progressing and contributing to organisational success.

We can describe **diversity** as being the mix of people in our organisation, and inclusion as being about creating a workplace environment that enables that mix to work – for organisations and employees.

Diversity Council Australia, Diversity & Inclusion Definition, Sydney, Diversity Council Australia, 2017.

2. Our Commitment

We are committed to a workplace culture that is diverse, inclusive, and gender-equal. We want to bring out the best in our people, support full productivity and participation, and better reflect, represent and provide opportunities for the citizens and communities we work with.

We will work together to create an environment of trust, respect and inclusion where our people feel valued, supported and respected. We want our people to feel free to contribute, bring their full authentic selves to work and have equal access to opportunities.

We are committed to doing business in a way that builds social inclusion, opportunity and community resilience. We recognise that by working locally and collaboratively, we can positively impact and provide opportunities for regions, communities and people challenged by disadvantage.

We believe that a diverse and inclusive culture in our workplace, with our partners and suppliers, and in the communities where we work, leads to increased engagement and better decision making and a more innovative and successful business.

Diversity and Inclusion Statement

We know that a diverse and inclusive culture provides the best opportunity to positively impact our renewable energy future and achieve our vision.

3. Our Diversity and Inclusion Strategy

The principles contained in the Diversity and Inclusion Statement will guide us to develop a Diversity and Inclusion Strategy and action plan. This plan will aim to:

- Cultivate and sustain a diverse and inclusive and equitable workplace culture where all workplace participants:
 - Feel included, valued, supported, and respected
 - Have equitable access to opportunities
 - Are treated with dignity, courtesy, and respect
 - Recognise the value brought by people of diverse backgrounds, cultures and perspectives
 - Feel safe to bring their whole selves to work and freely contribute to the best of their ability
 - Always embody professional and appropriate standards of behaviour
 - Are aware of our commitment to diversity and inclusion

- Address any areas for diversity and inclusion improvement, including for example:
 - Gender equality and balance
 - Inclusive leadership
 - Ensuring recruitment and other organisational systems, policies and processes are inclusive, accessible and free from bias
 - Recognition of Aboriginal and Torres Strait Islander workplace participants, communities and cultures
 - Project based diversity and inclusion targets developed in collaboration with local communities and recognising specific local concerns, including:
 - Disadvantaged groups
 - Single parents
 - Young people 15-24
 - Refugees and migrants
 - Regions experiencing disadvantage
 - Social procurement including local and indigenous businesses

Diversity and Inclusion Statement

- Mental health and wellbeing
 - Access for people with a disability and support for carers
 - Recognition of cultural and linguistic diversity
 - LGBTQI+ inclusion and safety
 - People of all ages and life stages being able to contribute fully as workplace participants
- Ensure compliance with anti-discrimination legislation to help prevent and eliminate all forms of harassment and bullying in the workplace and any employment-related disadvantage attributable to race, colour, gender (including transgender and intersex), sexual orientation, age, physical or mental disability, marital status, family responsibilities, pregnancy, religion, political opinion, national extraction, or social origin
 - Appropriate measurement, targets and reporting and monitoring, including maintaining accurate records and relevant reporting protocols internally and externally in respect to relevant aspects of diversity.

4. Our Policies and Procedures

If you experience actions and behaviours contradictory to our values and commitment to diversity and inclusion, you may refer to our relevant policies and procedures, for example EEO, bullying and harassment policy. Please also talk with your senior leader or another appropriate executive if you have concerns.

5. Employee Assistance Program (EAP)

Our Employee Assistance Program is a free and fully confidential service available to all team members. For more information see Sharepoint, or contact our Human Resources Manager.



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