

11 September 2023

Joe Fittell  
Team Leader  
NSW Department of Planning and Environment

**Re: E210657 - Sandy Creek Solar Farm - Amendment to project description (SSD-41287735)**

Dear Joe,

This letter has been prepared to seek inclusion of a temporary worker accommodation facility proposed as part of the Sandy Creek Solar Farm (SSD-41287735). To support inclusion of this infrastructure, the following information is provided:

- an overview of the temporary worker accommodation facility, including:
  - a description of the proposed facility and the nominated footprint for this temporary infrastructure (including a map showing the indicative location on which the proposed facility will be constructed)
  - a justification for the inclusion of this temporary infrastructure
  - the proposed assessment approach for the environmental impact statement (EIS)
- recommended changes to the project summary description in the Secretary's environmental assessment requirements (SEARs).

## 1 Background

Lightsource bp Renewable Energy Investments Ltd (LSbp) proposes to develop the Sandy Creek Solar Farm, a large-scale solar photovoltaic (PV) generation facility and battery energy storage system (BESS), supported by associated infrastructure (the Project).

The Project is in Goolma, approximately 25 kilometres (km) south-west of the township of Dunedoo and 55 km each of Dubbo, within the Central West Orana Renewable Energy Zone (CWO REZ) in the central west of New South Wales (NSW). The Project is located within both the Warrumbungle Shire and Dubbo Regional Local Government Areas (LGAs).

The Project is State significant development (SSD) pursuant to Schedule 1 of State Environmental Planning Policy (Planning Systems) 2021. Accordingly, approval for the Project is required under Part 4 of the NSW *Environmental Planning and Assessment Act 1979*.

The scoping report for the Project was submitted to the NSW Department of Planning and Environment (DPE) in April 2022 and Secretary's Environmental Assessment Requirements (SEARs) were issued on 20 May 2022. The Project includes, as described in summary in the SEARs:

- the construction, operation and decommissioning of a solar PV energy generating facility with an estimated capacity of 750 MW
- associated infrastructure, including grid connection and battery storage of up to 750 MW / 3,000 MWh.

At the time of preparation of the scoping report, it was anticipated that a large proportion of the Project's construction workforce would be sourced from the surrounding townships and regional centres including Dubbo, Wellington, Dunedoo and Gulgong. It was also anticipated that accommodation for the Project's non-local construction workforce would be through the use of available rental, motel and other accommodation in the region.

Since then, LSbp has continued engagement with the local community, Warrumbungle Shire Council, Dubbo Regional Council, and other stakeholders (including DPE, Energy Corporation of NSW (EnergyCo) and other renewable energy proponents in the local area) regarding potential approaches to construction related issues. Due to the location of the Project within the CWO REZ and the number of other proposed renewable energy projects in the local vicinity, potential for cumulative demands for construction labour and accommodating the non-local construction workforce across the region have been identified as key issues for consideration, with anticipated shortfall in supply of both subject to approval timeframes, staging of construction, and workforce requirements for the proposed projects across the region. As such, a flexible and adaptive approach to workforce accommodation has been identified as required for the Project.

## 2 Workforce accommodation strategy

The proposed workforce accommodation strategy may include a combination of:

- construction of a temporary worker accommodation facility within the development footprint
- use of available off-site accommodation within the local community
- use of an off-site accommodation facility currently under consideration by EnergyCo for the CWO REZ.

These options are described below.

### 2.1 Temporary worker accommodation facility

If EnergyCo's CWO REZ accommodation facility does not proceed or not able to accommodate the Project's construction workforce, an on-site temporary worker accommodation facility (up to 350 bed capacity) will likely be required. Approval will be sought to build this facility to accommodate the Project's peak construction workforce (i.e. up to 350 workers). A description of the proposed facility and indicative location is provided in Section 3. LSbp is seeking to include this additional infrastructure in the development application.

### 2.2 Off-site accommodation

Off-site accommodation options exist in surrounding townships and regional centres (including Dubbo, Wellington, Dunedoo and Gulgong). Based on discussions with Warrumbungle Shire Council, Dubbo Regional Council and the local community, existing accommodation capacity is limited, and while there may be some limited supply available of suitable accommodation, there is unlikely to be adequate accommodation for the entire Project workforce during peak construction.

LSbp will continue to engage with the local councils and local accommodation providers to identify any opportunities to work with local businesses where there is capacity and community benefit to do so.

### 2.3 Use of EnergyCo's CWO REZ accommodation facility

EnergyCo is currently considering the potential demand, design requirements, siting options and planning approval pathway for a combined construction workforce accommodation facility for the CWO REZ that could accommodate the workforce associated with this and a number of other proposed renewable projects in the vicinity. LSbp is supportive of this proposal and will continue to engage with EnergyCo as information becomes available regarding planning approval and construction timeframes. Dependent on the outcomes of EnergyCo's processes, this option presents an opportunity for accommodating the workforce for the Project, however LSbp will continue to pursue alternative options in parallel to ensure a viable option is available in the event that this option doesn't meet all of the Project's accommodation requirements.

## 3 Proposed temporary worker accommodation facility

### 3.1 Description of the activity

A temporary worker accommodation facility for non-local construction employees (where skills cannot be sourced locally) may be established as part of the early stages of the Project's construction. The facility will accommodate up to 350 workers. It is anticipated that a significant proportion of the Project's non-local construction workers may be required to reside at the facility.

An indicative footprint for the temporary worker accommodation facility is provided on Figure 1. The nominated footprint for the facility is approximately 12 hectares (ha) and is zoned RU1 Primary Production under the Warrumbungle Local Environmental Plan 2013. It is currently used for grazing and is located within a future easement proposed for future transmission lines into the Elong Elong energy hub as part of EnergyCo's Central West Orana REZ Transmission Infrastructure project (SSI-48323210). Construction of these transmission lines will be undertaken following completion of construction of this Project, and therefore the land will be available for use temporarily by the Project during the construction phase works.

The accommodation facility will be accessed via a separate access point off Dapper Road (Figure 1).

The nominated footprint for the temporary worker accommodation facility has been selected based on its:

- location within the study area
- proximity to construction activities
- accessibility off Dapper Road
- proximity to sensitive receptors (with consideration of matters such as compliance with noise criteria, traffic, transport and accessibility impacts, dust and light spill) and limited potential for environmental impact.

To build the temporary worker accommodation facility, topsoil will be stripped where necessary, hardstand, walkways and carparks constructed. Where possible, local businesses will be engaged to supply goods and services to the facility, typically consisting of laundry, cleaning and catering.

The facility is expected to be dismantled and its footprint rehabilitated once the Project is constructed.

The exact location of the facility within the nominated footprint will be determined during the detailed design stage of the Project. The footprint provided is sufficient to accommodate infrastructure necessary to support up to 350 workers (including carparking).

### 3.2 Justification for the activity

Based on a review of DPE's Major Projects register and consultation with key stakeholders, including local councils, EnergyCo and proponents of other renewable projects in the vicinity, it is known that there are a number of other projects that are currently being assessed within the CWO REZ, including:

- Spicers Creek Wind Farm
- Coborra Solar Farm
- Dapper Solar Farm
- Birriwa Solar Farm
- Barney's Reef Wind Farm
- Valley of the Winds Wind Farm.

An influx of workers requiring accommodation to facilitate the construction of these projects at the same time could place pressure on local short-term accommodation and other services within the townships of Dubbo, Wellington, Dunedoo and Gulgong, which may have adverse flow-on effects. For example, construction workers may restrict the availability of supply of short-term accommodation to other users during peak periods such as school holidays, the region's major festivals and annual events and periods of high demand for agricultural operations.

If the Project were to rely on short-term accommodation and occupy available rooms at any given time, there would likely be a negative impact on local tourism and agricultural operations throughout the Project's construction period.

LSbp's consultation with local stakeholders has identified that suitable accommodation is limited and already in short supply in the region. In response to this, LSbp is developing a workforce accommodation strategy in order to manage impacts on accommodation service providers and existing industries.

### 3.3 Assessment approach

Identification of the indicative location for the temporary worker accommodation facility has considered constraints and issues informed by field survey and assessment undertaken to date as part of preparation of the EIS.

Particular emphasis during project planning will continue to be given to enhancing the Project's social and economic benefits. LSbp is continuing to engage with the local community and businesses to identify opportunities for local business participation and community enhancement. Local firms including trades such as electricians, plumbers and carpenters and cleaning and catering services are likely to be used to service the temporary worker accommodation facility, where available. The direct benefits of these initiatives to the local community will be described in the EIS and other opportunities for maximising local benefits explored.

Potential impacts associated with the temporary worker accommodation facility will be considered within the EIS and relevant technical assessments, including the traffic and transport, economic, social, water resources (including water demand and wastewater management), bushfire, waste management and visual impact assessments.

## 4 Revised project summary

LSbp proposes the following amendment to the Project as described in the SEARs:

*Sandy Creek Solar Farm which includes:*

- *the construction, operation and decommissioning of a solar photovoltaic (PV) energy generating facility with an estimated capacity of 750 MW; ~~and~~*
- *associated infrastructure, including grid connection and battery storage of up to 750 MW / 3,000 MWh; and*
- *a temporary worker accommodation facility and associated ancillary infrastructure (should it be required).*

Please do not hesitate to contact me if you'd like to discuss this further.

Yours sincerely



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Associate Environmental Engineer

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