

14 April 2026

Department of Planning, Housing and Infrastructure
Attention: Rita Hatem
Locked Bag 5022
PARRAMATTA NSW 2124

Rita.Hatem@planning.nsw.gov.au

Dear Sir/Madam

Brewongle Solar Farm (SSD-64834490)

I refer to your advice of 31 March 2026 advising of receipt of the applicant's Submissions Report and amended documentation.

In response I provide the following:

Potential overlap with other SSD projects

Council continues to be concerned that the Planning system does not provide an adequate basis for consideration of the cumulative impacts of multiple SSD proceeding. There is a lack of understanding at a regional level as to the final scale, timing and therefore the impacts of the projects. A proper understanding of the cumulative impacts is therefore impossible.

Statements such as the "likely timing" of other projects and "unlikely that construction periods of these projects will overlap" made in the Submissions Report do not further that understanding of the broader impacts.

Salt Water Creek Bridge

The existing bridge over Salt Water Creek was the subject of Level 3 Inspection and Load Assessment in 2019. That Assessment concluding the load limits should be applied to the existing bridge and that it be replaced.

The replacement of Salt Water Creek Bridge is subject to administrative issues (securing access to land for the purposes of road re-alignment) and funding constraints (grant funding dependent) which means that the timing for replacement is not known.

Council acknowledges that the project is contingent upon Salt Water Creek Bridge being upgrading prior to commencement of construction. That would be the only feasible option for the time being. The consent conditions should make that point clear.

Traffic Management

Council supports the recommendation that the proponent prepare a dilapidation report for the relevant sections of public roads within its control, together with the commitment to remedy any damage caused during construction.

The Traffic Management Plan should be explicit in limiting access to the site from the east and no construction traffic should use Wests Lane. This would extend to all forms of traffic including light vehicles.

Cumulative Traffic Impacts with other SSD

There is a growing community concern regarding the cumulative impacts of multiple SSD projects proceeding within the LGA and the broader region as they relate to the transportation of infrastructure through Bathurst.

The projects considered in Part 4.2.4 of the Amended TIA are limited to 9 projects. Other planned projects have not been considered in those cumulative projects.

SSD Projects within Lithgow and Oberon LGA's (particular wind projects) will require transportation through Bathurst. Those cumulative impacts are not clearly articulated.

Assumptions such as the Paling Yards Wind Farm relying on a shorter and faster route via Rockley Road (Amended TIA) are not supported. The Paling Yards Traffic Impact Statement includes no discussion on the use of alternative routes such as Rockley Road. Similarly, the proponents of Paling Yards Wind Farm have had no discussions with Bathurst Regional Council regarding the use of Rockley Road.

The most likely scenario is that the Brewongle Solar proposal, the Paling Yards Wind Farm and The Pines Wind Farm will all rely upon similar transport routes through Bathurst to O'Connell Road.

Council can see nothing to support the Amended TIA conclusion that *"none of assessed projects (being the identified SSD projects) are expected to utilise O'Connell Road and Tarana Road as part of their designated routes for construction traffic (excluding OSOM vehicles associated with the Paling Yards Wind Farm which would operate under escort and with specific traffic management procedures)."* All available information to date is to the contrary.

Statements such as the "likely timing of these projects" and "unlikely that the construction periods of these projects will overlap" are of no assistance to understanding the cumulative impacts of traffic.

Flooding

There is reference to an updated SWIA being provided (referred to as Appendix F in the Submissions Report). Appendix F is not available on the Planning Portal. The extent to which it provides answers to the issues raised is not known.

Council's initial concerns regarding flooding included the cumulative impacts of other developments including the approved Glanmire Solar will have on Salt Water Creek Bridge and downstream properties.

The Submissions Report refers to a SWIA predicated on a qualitative assessment of the cumulative impacts rather than a quantitative assessment to support its position in relation to cumulative impacts.

The Flooding Response (Appendix G) provided makes no further mention of the cumulative impacts of this proposal and the Glanmire Solar proposal.

Accommodation and Employment Strategy

At a high level, Council has concerns regarding the impact that multiple renewable projects will have on accommodation and housing affordability.

To the extent that the original Social Impact Assessment foreshadowed the preparation of an Accommodation and Employment Strategy and provides a draft Strategy it is noted that:

- The cumulative impacts assessment has been limited to 6 large scale SSD projects. It does not take into account other SSD projects within the same area of influence including wind farm proposals in the Bathurst, Lithgow and Oberon LGA's at various stages of planning.
- Use of privately owned dwellings to provide housing is a "low priority".
- Use of privately owned rentals is a "low priority".
- Short term accommodation (tourist) is limited in supply but will form the predominant accommodation type.
- Placing a heavy reliance upon short term accommodation (tourist) has flow on effects for the tourism industry.
- The estimated number of available short term accommodation rooms in Bathurst is 263 (table 6-2 of the draft Workforce Accommodation Plan) and the peak workforce is 200 employees.
- Housing the peak workforce requires the dedication of all "spare" accommodation capacity for this proposal alone.
- Whilst the assessment points to benefits to accommodation providers it is equally likely to lead to reductions in availability of accommodation during important events and increased accommodation costs.
- Recommendations such as relocating staff during periods of high occupancy is unlikely to be a reasonable solution.

In terms of the impact upon the broader housing Council is already experiencing issues with housing affordability particularly for those in the very low income households. Refer to Council report to the Council Meeting held on 18 February 2026 for further information. The broader impact of this and other SSD projects has the potential to exacerbate these issues.

Planning Agreement

Council has commenced discussions with Edify Energy in relation to a Planning Agreement. The final form and content have yet to be finalised.

Glint and Glare

Council acknowledges that the Glint and Glare Assessment now include consideration of Bathurst Airport.

Site Design

The Response to Submissions includes a commitment that the colours, materials and finishes should be “compatible with surrounding visual environment of the LCZ2, where possible. The use of a natural colour palette to help visually conceal or blend some of the Project’s main visual features...is recommended”. Overall, this is largely meaningless when what is meant by compatible finishes and a natural colour palette to visually conceal or blend dominant features is not specified.

Yours faithfully



R Denyer
MANAGER DEVELOPMENT ASSESSMENT