

NEW ENGLAND SOLAR FARM

Accommodation and Employment Strategy

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This strategy has been prepared by Onward Consulting in accordance with the brief provided by ACEN Australia and GLC and has relied upon the Project information available at the time of writing and all findings, conclusions or recommendations contained in the report are based thereon. The report is for the use of ACEN Australia and no responsibility will be taken for its use by other parties. ACEN Australia may, at its discretion, use the report to inform regulators and the public.

Acronyms and Abbreviations

Acronym	Description
ACEN	ACEN Australia Pty Ltd (previously UPC Renewables Australia Pty Ltd)
AES	Accommodation and Employment Strategy
BESS	battery energy storage system
CoC	Conditions of consent of SSD 9255
CEMP	Construction Environmental Management Plan
Council	Uralla Shire Council
DA	development application
DPE	NSW Department of Planning and Environment
DPIE	NSW Department of Planning, Industry and Environment (now DPE)
Decommissioning	The removal of solar panels and ancillary infrastructure and/or rehabilitation of the Site
EA	Environmental Assessment, and any relevant Modification Reports
EIS	Environmental Impact Statement for the NESF
EMS	Environmental Management Strategy
EPA	NSW Environment Protection Authority
EP&A Act	<i>Environmental Planning and Assessment Act 1979 (NSW)</i>
EPBC Act	<i>Environment Protection and Biodiversity Conservation Act 1999 (Cth)</i>
GHG	greenhouse gas
GWh	gigawatt hour
ha	hectare
LGA	local government area
km	kilometre
kV	kilovolt
m	metre
m ²	square metre
m ³	cubic metre
MW	megawatt
NESF	New England Solar Farm
NSW	New South Wales
PV	photovoltaic
REZ	Renewable Energy Zone
RMS	NSW Roads and Maritime Services
RTS	Response to Submissions (report)
SEPP	State Environmental Planning Policy
SRD SEPP	<i>State Environmental Planning Policy (State and Regional Development) 2011</i>
SSD	State significant development
UNE	University of New England

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1. Introduction

1.1 New England Solar Farm

ACEN Australia Pty Ltd (ACEN Australia) (formerly named UPC Renewables Australia Pty Ltd) has approval to develop the New England Solar and Battery Project; a significant grid-connected solar and battery energy storage system (**BESS**) project along with associated infrastructure, approximately 6 kilometres (km) east of the township of Uralla, which lies approximately 19 km south of Armidale, in the Uralla Shire local government area (**LGA**) (hereafter referred to as the **NESF** or **the Project**). The Project is within the New England Renewable Energy Zone (**REZ**). The Project was approved, subject to conditions, by the New South Wales (**NSW**) Independent Planning Commission (**IPC**) on 9 March 2020 (SSD-9255).

The Project involves:

- a central and northern array of photovoltaic panels (PV) modules with indicative capacities of 400 and 320 MW AC respectively¹;
- a 200 MW/400 MW hour (MWh) battery energy storage system (BESS);
- inverters, an underground cable network and electrical connection infrastructure between the two array areas;
- a grid substation to connect the Project to TransGrid's electricity transmission network;
- an access road from the local road network and internal access tracks; and
- stock-proof security fencing around each of the solar fields.

The NESF site (**the Site**), which spans approximately 2,000 hectares (**ha**) of previously cleared grazing land, is located in a rural area with the nearest non-associated residence located about 450 m at its closest point. All other non-associated residences are located at least 1 km away. The NESF is located in close proximity to the New England Highway and the Main Northern Railway and has direct access to the electricity network via TransGrid transmission lines which passes through the Site. The Project in its regional context is presented in Figure 1.1. The layout of the NESF is presented in Figure 1.2.

1.2 Development consent

1.2.1 Approval pathway

The Project is identified as a State significant development (**SSD**) under the *Environmental Planning and Assessment Act 1979* (NSW) (EP&A Act) and the *State Environmental Planning Policy (State and Regional Development) 2011* (**SRD SEPP**).

The Project was subject to the SSD assessment and approval provisions of the EP&A Act and a development application (**DA**) and environmental impact statement (**EIS**) were submitted for assessment. The DA and EIS for the Project were publicly exhibited from 20 February to 20 March 2019.

¹ The total capacity allocation may change during detailed design based on a number of factors, including geotechnical conditions, medium voltage cable reticulation and inverter placement and technological advances (e.g. improvements to the efficiency of photovoltaic (PV) modules)

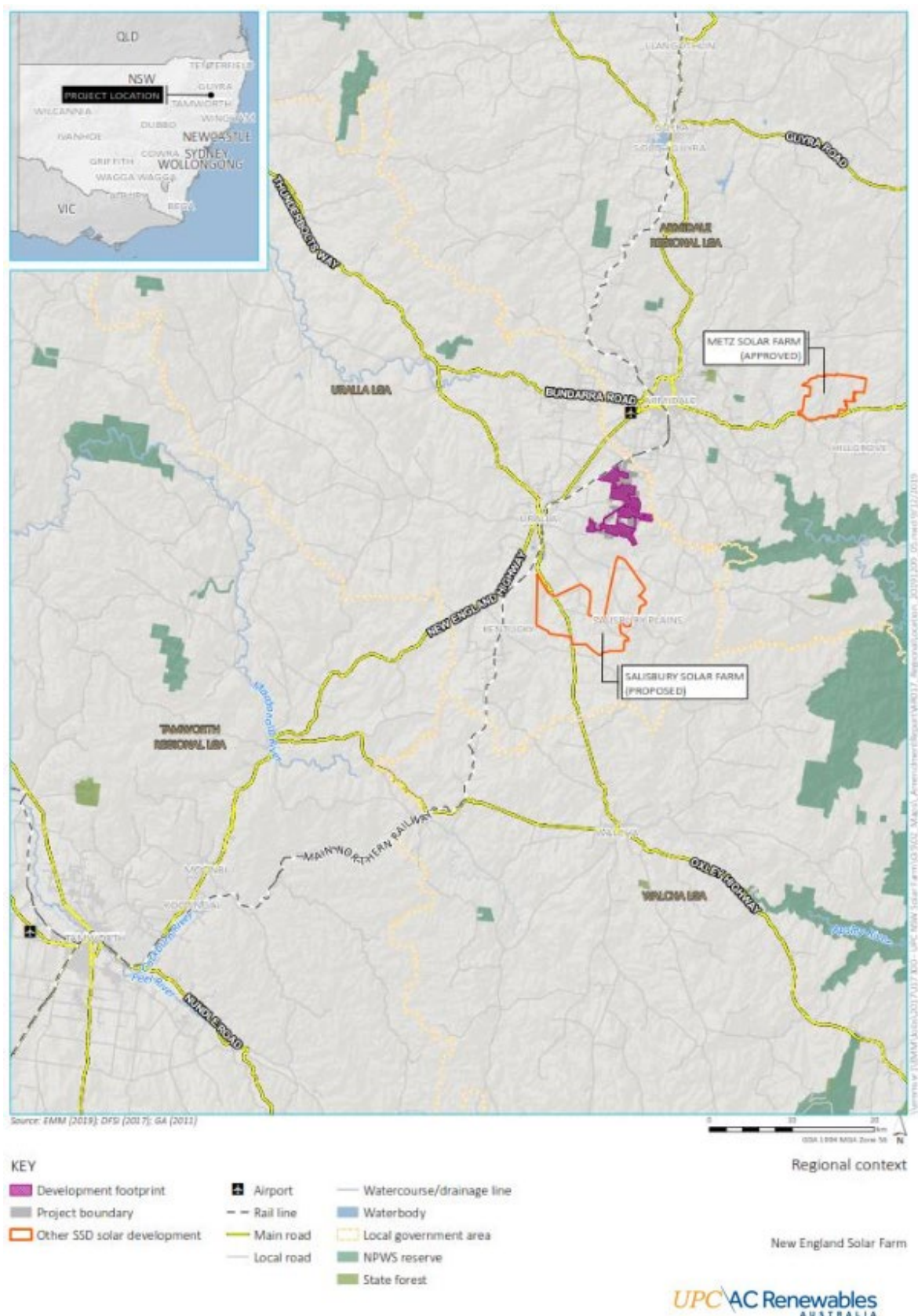
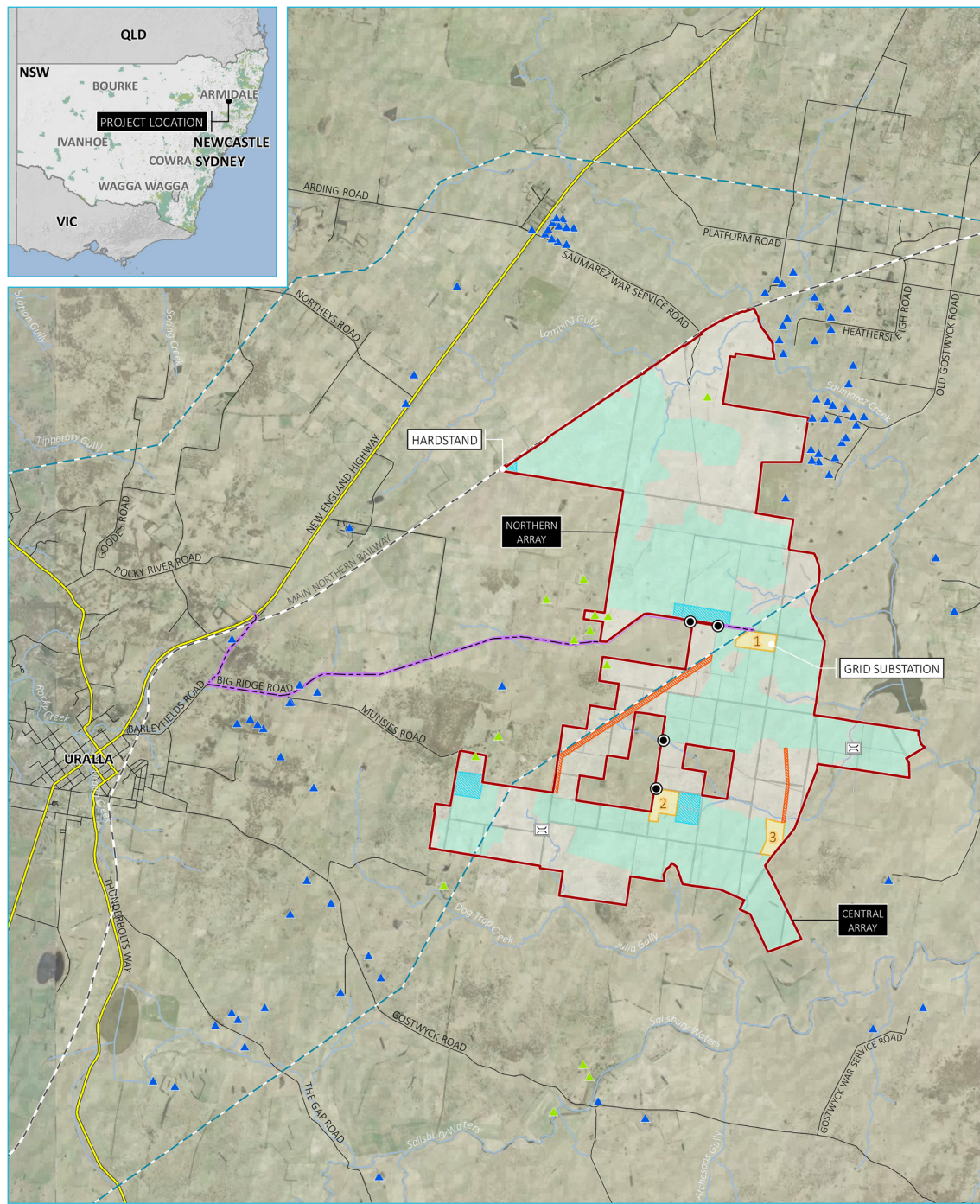


Figure 1.1 - Regional context



Source: EMM (2020); DFSI (2017); GA (2011); UPC (2020)

*The extent of Lot 1 of DP 227322 within the development footprint is 205.4 hectares, which represents approximately 8.4% of the total lot. Subsequently, the full extent of Lot 1 of DP 227322 has been excluded from the project boundary.

** The grid substation (location 1) and only one of potential substation location numbers 2 or 3 to be constructed

KEY

- 330 kV transmission line
- Rail line
- Main road
- Local road
- Watercourse/drainage line
- Sensitive receptors
 - ▲ Project-related
 - ▲ Non-project related
- Project boundary *
- Development footprint
- Solar array
- Potential electrical cabling
- Potential laydown area/site compound
- Potential substation/BESS footprint (location number) **
- Hardstand in rail corridor
- Primary vehicle access route
- Potential creek crossing
- Proposed primary site access point

Location of the New England Solar Farm

New England Solar Farm
Modification report
Figure 1.1



Figure 1.2 - NESF layout

A number of submissions from the public, government agencies and other organisations were received by the NSW Department of Planning and Environment (**DPE**) following the public exhibition of the DA and EIS. A Response to Submissions report (**RTS**) was submitted to the DPIE in June 2019, addressing the matters raised in the submissions provided during the EIS exhibition period.

As a result of further discussions with the local community, landholders and other stakeholders, ACEN made a number of amendments and refinements to the proposal that was the subject of the DA and EIS, including the removal of a southern array and the Construction Accommodation Village (CAV). An Amendment Report, prepared and submitted to the DPE in June 2019 in conjunction with the RTS, summarised the changes made since the EIS exhibition and the impacts associated with the amended Project. Following the submission of the RTS and Amendment Report, ACEN continued consultation with DPE, NSW Roads and Maritime Services (**RMS**) and Uralla Shire Council (**Council**) in relation to a number of issues. Consolidated responses to DPE's requests for additional information, including updated Project figures, were submitted in October and December 2019 to the DPE in the form of memoranda.

The DPE undertook a comprehensive assessment of the merits of the Project and considered all potential issues in accordance with the requirements of the EP&A Act. Under Section 4.5 (a) of the EP&A Act and clause 8A of the SRD SEPP, the DPIE referred the Project to the IPC on 19 December 2019. Development consent SSD 9255 for the NESF was granted on 9 March 2020.

The Development consent was most recently modified on 16 February 2021 (Modification 1 – road upgrade disturbance area increase). A further modification (Modification 2) is currently in the assessment phase.

1.2.2 Consent conditions

The Project has been approved to be developed subject to a number of conditions of consent for SSD 9255 (CoC) as issued by the IPC. These conditions are required to:

- prevent, minimise and /or offset adverse environmental conditions;
- set standards and performance measure for acceptable environmental performance;
- require regular monitoring and reporting; and
- provide for the ongoing environmental management of the Project.

Consent condition 28 of Schedule 3 states that prior to commencing construction, ACEN must prepare an Accommodation and Employment Strategy for the Project in consultation with Council, and to the satisfaction of the Secretary. This Strategy must:

- (a) propose a strategy to ensure there is sufficient accommodation for the workforce associated with the Project;
- (b) consider the cumulative impacts associated with other State significant development projects in the area;
- (c) investigate options for prioritising the employment of local workers for the construction and operation of the development, where feasible; and
- (d) include a program to monitor and review effectiveness of the strategy over the life of the Project, including regular monitoring and review during construction.

Further, following the Secretary's approval, ACEN must implement the approved AES. Schedule 4 of the SSD 9255 specifies a number of environmental management and reporting conditions that are relevant to the AES. These relate to the revision of strategies, plans and programs; incident notification; and non-compliance notification. These conditions are further addressed in Section 6.4.

Consent condition 2(a) of Schedule 2 states that ACEN must carry out the development generally in accordance with the EIS. Within the EIS, a number of commitments were made with regard to a Construction Workforce Management Plan, which this AES addresses, specifically:

- Consultation mechanisms with Uralla Shire Council, Armidale Regional Council and Tamworth Regional Council to avert pressure on local resources and ensure a reasonable approach to planning transient worker housing;
- Consultation frameworks with local accommodation providers to ensure fairness, open communications and forward planning, and grievance mechanisms;
- Plans for medical and other needs to ensure appropriate spread of workforce needs across all local resources and to avoid heavy pressure on a small number of local GPs; and
- A Code of Conduct for the project's workers (particularly to avoid anti-social behaviour at peak construction times).

1.3 Document structure

This Accommodation and Employment Strategy (hereafter referred to as the **AES** or **Strategy**) has been prepared to address the various requirements of Condition 28 and is structured as follows:

- Section 1 provides an overview of the Project and the approval pathway; a brief description of the consent conditions directly relevant to this Strategy; and a description of the purpose of this AES;
- Section 2 provides a brief overview of the local and regional social and economic structure;
- Section 3 describes the workforce required during the construction, operation and decommissioning phases of the Project. It also addresses the cumulative impacts and interaction with other local projects;
- Section 4 describes the employment strategy, including a description of the local employment opportunities; the recruitment strategy; and the mechanisms to prioritise local employment;
- Section 5 describes the accommodation strategy, including an overview of short-term and rental accommodation; and a hierarchy of accommodation options; and
- Section 6 provides details on the actual implementation of the AES, including monitoring and reporting; the associated record keeping; and the process of evaluation and review.

This Strategy forms part of the supporting documentation to the Environmental Management Strategy (EMS) which provides the strategic framework and 'roadmap' for the overall environmental management for the Project (refer to Figure 1.3). The EMS:

- incorporates all required plans, protocols, management and mitigation measures;
- identifies all relevant statutory approvals;
- establishes roles, responsibilities, authorities and accountabilities of all key personnel involved in the environmental management of the Project (including the proposed road upgrades);
- establishes procedures for consulting with neighbouring landholders, the local community and relevant agencies, including Council and the RMS, about the operation and environmental performance of the Project; and
- establishes procedures for handling of complaints, disputes, non-compliances and emergency response.

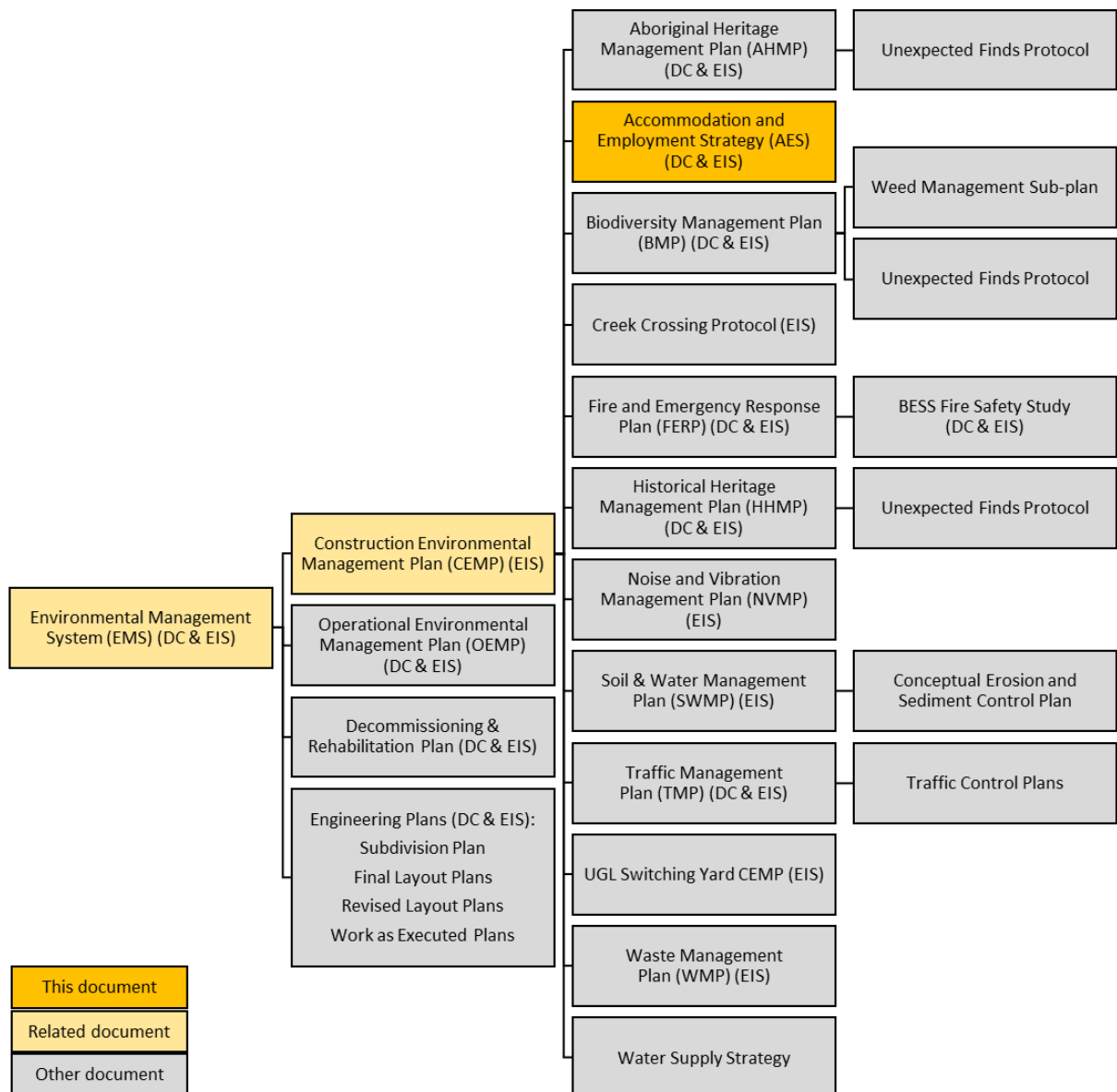


Figure 1.3 – Environmental management documents structure

1.4 Consultation

Extensive consultation was undertaken during the preparation of the EIS and leading up to Project approval in March 2020.

ACEN consulted with Council during the preparation of this Strategy. A copy of the draft Strategy was provided to Council's (Manager of Development and Planning) by email on (20 November 2020). Comments and feedback on the draft Strategy were received on (2 December 2020), which stated that the Council proposed no amendments to the Strategy. A copy of Council's response is provided in Attachment A.

Consultation with DPE regarding approval of this Strategy is provided in Attachment 2.

Since approval of the Strategy, consultation has continued to occur, including:

- Industry briefings and open days during the procurement process.
- Ongoing consultation with accommodation providers to verify availability of beds and effects of other major projects in the region.
- Consultation with medical practices to confirm the level of service provided.
- Consultation with local councils to understand future events occurring in the area that have potential to affect accommodation availability.

1.5 Roles and responsibilities

The roles and responsibilities relevant to the Strategy are provided in Table 1.1.

Table 1.1 – Roles and Responsibilities

Role	Responsibility
Project Manager (GLC)	Ensure the Strategy developed, implemented and maintained in accordance with the relevant requirements of the development consent.
Community Liaison Officer (GLC)	Responsible for consultation with stakeholders and monitoring as required by this Strategy.

2. Social and Economic Profile

2.1 Local profile

Uralla is a medium-sized rural town on the New England Highway approximately halfway between Sydney and Brisbane. It is located approximately 215 km (3 hours) west of Coffs Harbour by road and approximately 22 km south of Armidale, the nearest major regional centre. The population of the Uralla Shire LGA was 6,016 in 2016, with 20.5 % aged 65 and over, 19.3 % aged under 14 and a median age of 46. Approximately 11% of Uralla Shire LGA's population identified as Aboriginal and/or Torres Strait Islander.

In 2016, within Uralla Shire LGA, 30.6 % of the population were attending an educational institution, with 4.3 % in a tertiary or technical institution. Most businesses within the Uralla Shire LGA are associated with agriculture, forestry and fishing, which contribute to more than \$100 million, or 25 % of the Uralla Shire LGA's gross regional product. The importance of agriculture to the Uralla Shire LGA's economy is further reflected by the area's employment statistics, which indicate that approximately 400 employees or 30 % of employment within the Uralla Shire LGA is supported by agriculture, forestry and fishing.

Tourism is a key industry in Uralla Shire LGA, bringing in approximately 17,000 visitors and approximately \$6 million per year. ABS statistics indicate that the number of businesses within the Uralla Shire LGA have been generally stable, or marginally declining (from 630 to 613), over the period 2012-2015. The decline was attributable to a reduction in the number of mid-sized businesses employing 5-19 people. Non-employing businesses represent a little over half of the number of registered businesses in the Uralla Shire LGA.

The development footprint for the Project intersects a mix of large-scale and small-scale farms from within the Uralla Shire LGA. The agricultural properties that make up the development footprint are currently primarily used for sheep grazing for production of wool and lambs, with some cattle grazing for beef production.

2.2 Regional profile

While the Project is located in the Uralla Shire LGA, the broader regional economy comprising Uralla Shire, Armidale Regional, Walcha Shire and Tamworth Regional LGAs has the potential to contribute to the Project and derive economic benefits from both the construction and operation phases. Major industries of employment across the LGAs include beef-cattle farming (specialised), sheep farming (specialised), sheep-beef-cattle farming, hospitals, teaching, administration and mining. Agriculture accounts for up to 50 % of economic activity in some parts of Uralla Shire LGA, although Tamworth and Armidale LGAs have more diverse economies.

In 2016, the regional economy had a population of 95,160 and a labour force of 43,725, with Tamworth Regional LGA being the largest. In 2016, there were 2,786 people unemployed with the majority of these located in Tamworth Region LGA although the unemployment rate was highest in Armidale Regional LGA.

The main occupations of usual residents were professionals followed by managers (which includes farm managers). The percentage of usual residents employed as professionals was greatest in Armidale Regional LGA and Tamworth Regional LGA, while the percentage of usual residents employed as managers was greatest in Uralla Shire LGA. Beef cattle and sheep farming are significant industry sectors for residents of Uralla Shire LGA, while hospitals and higher education are significant sectors of employment for residents of Tamworth Regional LGA and Armidale Regional LGA, respectively.

3. Workforce Generation

The Project will be constructed in two stages as follows:

- Stage 1 - construction of the northern array area including the solar array substation and the grid substation, which commenced on 7 February 2022 and is expected to be completed around April 2023.
- Stage 2 - construction of the central array area including the solar array substation, and the construction of the BESS, which is expected to commence in Q1 2023 and be completed in approximately 24 months.

The exact timing of the commencement of Stage 2, and the subsequent duration of the overlap with Stage 1 is still being finalised. Similarly, the overall duration of the Project's construction will be confirmed once the preferred engineering, procurement and construction contractor is selected and the detailed construction schedule is confirmed. The timeframes are conservative and indicative only at this time.

Unless approval has been obtained from the Secretary, construction, upgrading and decommissioning activities on site can only be undertaken between the following hours:

- 7 am to 6 pm Monday to Friday;
- 8 am to 1 pm Saturdays; and
- at no time on Sundays and NSW public holidays.

3.1 Workforce estimates

3.1.1 Construction

The EIS originally predicted the direct employment opportunities generated by the Project to be up to 700 full-time equivalents (FTEs) at the peak of construction including Stage 1, 2 and BESS.

Pre-construction works, which included access road upgrades, establishment of the temporary construction site compound and fencing, generally required around 20 to 50 workers on site between March 2021 and February 2022.

Since February 2022 when construction began, the workforce has been building gradually towards the predicted peak of up to 450 people. The estimated Stage 1 workforce curve (from the originally approved Strategy) between January 2022 and April 2023, and the actual average workforce numbers up to September 2022, is presented in Figure 3.1Figure 1.1. Note that the original graph has been 'shifted' to reflect the actual construction commencement date (the original scheduled construction start date was affected by completion of the access roads, COVID-19 and inclement weather), and shortened to reflect expected completion of Stage 1 around April 2023.

After the expected peak construction workforce of 450 people, the number of workers is anticipated to reduce gradually until Stage 1 is completed, or Stage 2 commences construction (timing to be confirmed).

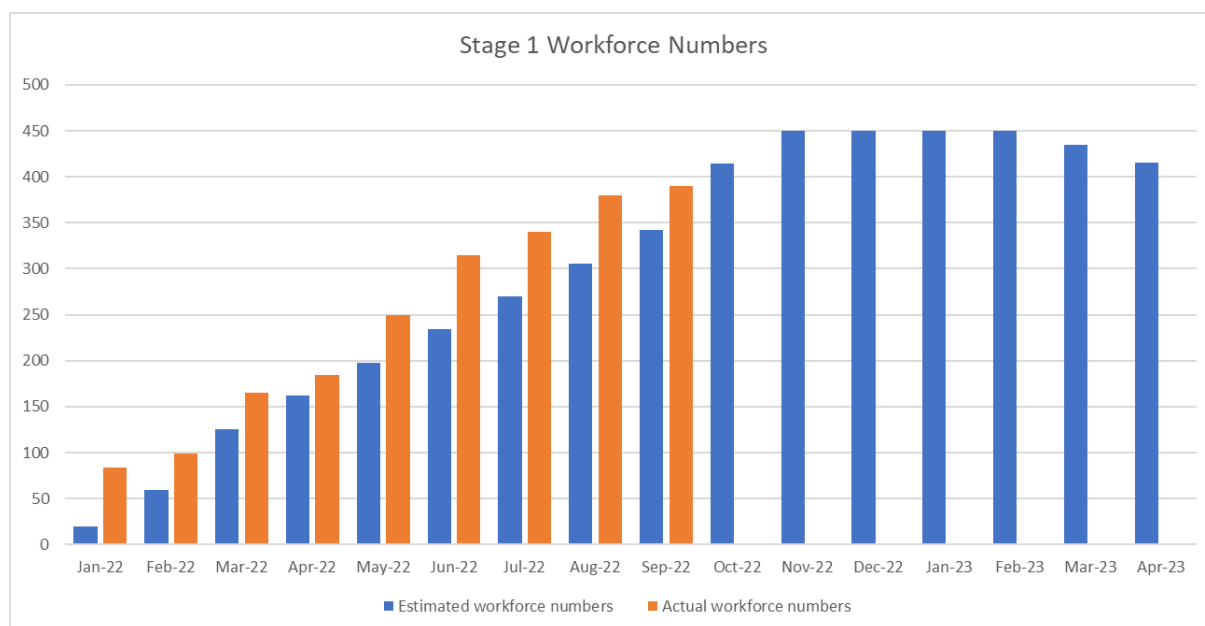


Figure 3.1 - Estimated Stage 1 workforce numbers

It is expected that Stage 2 will largely reflect Stage 1, and it is estimated that the workforce for Stage 2 will be very similar to Stage 1 due to the similarities in size and time frames. Stage 2 however will include the construction of the BESS.

The exact overlap of the Stage 1 and Stage 2 construction periods has not yet been determined. The AES will be updated once Stage 2 construction periods are known.

3.1.2 Operation

The operational lifespan of the Project will be in the order of 30 years, unless the facility is re-powered at the end of the PV modules' technical life. The decision to re-power the plant will depend on the economics of solar PV technology and energy market conditions at that time. Should the PV modules be replaced during operations, the lifespan of the Project may extend to up to 50 years. Throughout operations, a workforce of up to 15 FTEs will be required.

It is anticipated that the facility will require regular maintenance throughout its operational life. This will include the following ongoing tasks:

- site maintenance including:
 - vegetation maintenance;
 - weed and pest management;
 - fence and access road management;
 - upgrading drainage channels; and
 - landscaping;
- infrastructure maintenance including:
 - panel cleaning;
 - panel repair (if required); and

- equipment, cabling, substation and communications system inspection and maintenance.

The operational workforce will also be responsible for ongoing security monitoring of the two array areas and Project infrastructure.

3.1.3 Decommissioning

Once the Project reaches the end of its investment and operational life, the Project infrastructure will be decommissioned and the solar farm footprint returned to its pre-existing land use, suitable for grazing of sheep and cattle, or another land use as agreed by the Project owner and the landholder at that time.

Project decommissioning will require disturbance of the development footprint during the removal of equipment. A significant number of FTEs, including both staff and contractors, and vehicle movements will be required during the decommissioning stage of the Project.

3.2 Cumulative impacts

Consent condition 28 requires the consideration of the cumulative impacts associated with other approved or proposed State significant development projects in the area. According to the DPE's Major Project's website [<https://www.planningportal.nsw.gov.au/major-projects>], these include the Metz, Oxley, Salisbury and Tilbuster solar farms; the Armidale Secondary College; and a University of New England (UNE) construction project.

It should be noted that the previously proposed 400 MW Uralla Solar Farm (application SSD 9534) has been withdrawn.

3.2.1 Metz Solar Farm

The nameplate 115MW Metz Solar Farm has been approved for a site immediately north of Waterfall Way, approximately 18 km east of Armidale and within Armidale Regional Council's LGA. It received development consent (SSD 7931) in July 2017. AEMO and Transgrid grid-connection approval was secured in July 2018, and it is anticipated that the construction will commence in Q4 2020. The EIS estimated that the construction of the Metz Solar Farm project could provide jobs for up to 100 workers over the course of a year.

The Metz Solar Farm is not required to prepare an Employment and Accommodation Strategy, and as such has not further considered any cumulative employment and/or accommodation impacts. However, concurrent construction of the Metz Solar Farm and the NESF is not expected to cause an impact to the employment and accommodation options for NESF given the availability across the region (Section 5.3).

An update in March 2022 indicated that the Metz Solar Farm³ was in advanced stages of construction at the time. Based on consultation regarding availability of accommodation services, the cumulative impact of concurrent development has not had material effects.

³ <https://alj.com/en/news/frv-australia-metz-solar-farm-has-started-generating-clean-energy/>

3.2.2 Oxley Solar Farm

The nameplate 300 MW Oxley Solar Farm with up to 30 MW battery storage is proposed for a site on Gara Road, approximately 10 km east of Armidale, within the Armidale LGA. The Planning Secretary's Environmental Assessment Requirements (SEARs) were issued on 2 August 2019. The EIS was exhibited in March and April 2021. In June 2022 the Oxley Solar Farm in the Response to Submissions phase.

Based on currently available information, it is assumed that the NESF will be fully constructed and operational by the time the Oxley Solar Farm commences construction. Concurrent operation of the NESF is unlikely to be material, given the limited operational workforce requirements.

3.2.3 Salisbury Solar Farm

The nameplate Salisbury Solar Farm is proposed for the Salisbury Plains, approximately 7 km south-west of Uralla, within the Uralla LGA. The SEARs were issued on 15 August 2019. In September 2022, the Salisbury Solar Farm was in the EIS preparation phase.

Based on currently available information, it is assumed that the NESF will be fully constructed and operational by the time the Salisbury Solar Farm has obtained development consent and subsequent construction commences. Concurrent operation of the NESF is unlikely to be material, given the limited operational workforce requirements.

3.2.4 Tilbuster Solar Farm

The 152 MW (revised from 300 MW) Tilbuster Solar Farm site is located on the western side of the New England Highway, approximately 6 km north-west of the Tilbuster township. The site is located within the Armidale Regional Local Government Area. Armidale is approximately 13km south east from the site and is the closest regional centre. The SEARs were issued on 12 October 2018, and the project was approved on 3 March 2022 (SSD 9619).

The construction of the Tilbuster Solar Farm is expected to require direct local employment for civil works, fencing and landscaping. Local businesses including accommodation, catering, trades and other services will also be used throughout the duration of construction. However, based on currently available information, it is assumed that the NESF will be fully constructed and operational by the time the Tilbuster Solar Farm commences construction. Concurrent operation of the NESF is unlikely to be material, given the limited operational workforce requirements.

3.2.5 Armidale Secondary College

The redevelopment to combine the existing Armidale High School and Duval High School to establish a new, purpose built high school with a capacity for approximately 1,580 students received consent on 29 May 2019. Construction was completed in 2021. As such, the construction of the College did not have an impact on the construction of the NESF.

3.2.6 University of New England

The University of New England (UNE) received approval on 21 September 2020 for the development of a new Wright Block within the UNE Armidale Campus, consisting of three residential blocks, each three storeys in height with a total of approximately 345 beds and a hub building; demolition of the existing Wright Centre; and the addition of 188 car spaces. In September 2022, UNE advised that construction of the Wright Block was currently on hold without a known re-commencement date. There may be some construction overlap and depending on construction schedules, there may be opportunities for the new UNE development to provide additional accommodation for construction workers during construction of the NESF.

4. Employment Strategy

The Project needs to be considered in two separate modes - construction and operation. Any impacts associated with the Project would predominantly arise during the construction period, estimated to be approximately 40 months. Furthermore, the key impacts during the construction period derive from the workforce required for the construction of the Project. There are various factors related to the influx of a large workforce which can be managed and mitigated. These factors include the size of the overall workforce and the spread of demand; the movement of that workforce; and the accommodation of the workforce amongst others.

The Project construction schedule has been staged to reduce the peak workforce numbers; this means that the peak employment period for Stage 1 is separated from the peak employment period of Stage 2, with the duration of overlap still to be determined. This is the most effective way to mitigate the overall impact of the Project's construction workforce (and potentially accommodation) and was driven in part by the feedback received during community consultation. The deliberate separation of peaks in worker demand for the two construction stages has been proposed to mitigate the impact on local communities and also as an effective way for ACEN to maintain a level of work availability for the workforce, i.e. by avoiding demobilisation and remobilisation. The latter also benefits those people in the local community who are employed by the Project, by enabling greater continuity in employment.

The construction staging and minimal overlap between Stage 1 and Stage 2 means that the greatest demand will be in the vicinity of 450 workers. Conversely, if the Project were to not separate the Stage 1 and Stage 2 peaks, the overall workforce during a joint peak period would be close to 700 people. However, without staging, the development of the Project would likely occur over a shorter timeframe. Ultimately, a more even spread of employment demand through the specified Project staging avoids the 'boom and bust' consequences of sharp adjustments in Project employment.

Actions to encourage local employment are presented in Table 6.1 in Section 6.

4.1 Local employment opportunities

As described in Section 3, both Stage 1 and Stage 2 of the construction are estimated to require a peak workforce of approximately 450 people on-site, with the construction activities divided into civil, piling, mechanical and electrical works. The types of labour and skills required align with the construction phase of the Project:

- construction manager, foremen and leading hands
- surveyors;
- earthmoving and road construction plant and equipment operators;
- piling operators;
- module installers;
- trenching and underground cabling;
- electricians;
- general labourers;
- HSE and QA/QC personnel;
- human resources personnel; and
- security.

The EPC contractor has provided an indication of expected proportions of skilled and unskilled labour based on its experience constructing large-scale solar farms in rural Australia. The following proportions of skilled and unskilled roles is expected during construction for the Project:

- Qualified (University or TAFE qualified (engineers, electricians, etc)): 35%
- Specialised trained (machine operator, mechanical moulder, etc): 45%
- Unskilled: 20%

The types of labour and skills required for the operational phase of the Project are predominantly centred around electrical and maintenance (cleaning, mowing and road maintenance). Highly technical operation and maintenance activities will typically be undertaken by specialist contractors and/or equipment manufacturers, whereas routine activities such as fencing maintenance and vegetation management will be offered to local contractors. Training for some of the specialised trained roles could be undertaken locally to upskill potential employees to fill these roles. The Project also provides an opportunity for local people and local businesses to benefit from investment associated with construction of the NESF; if appropriate to the Project's level of financial responsibility, safety and performance. Local businesses will be encouraged to participate in the Project on the basis of providing competitive terms of business, price, quality and delivery, as well as taking into account safety and environmental considerations. The Project will partner with businesses which are appropriate and suitable for the Project, which will take into account experience, qualifications, value for money and shared values.

During construction, there will be a preference for employment of local and regional residents where they are able to demonstrate relevant skills and experience and a cultural fit with ACEN, the engineering, procurement and construction (EPC) contractor and the relevant subcontractor(s), where applicable. The origins of the Project's peak construction workforce are estimated to include:

- Uralla Shire LGA - approximately 10 %;
- Tamworth Regional LGA - approximately 20 %; and
- Armidale Regional LGA - approximately 20 %.

The remaining 50 % of the Project's peak construction workforce are anticipated to originate from outside of these LGAs. This ratio of around half the construction workforce coming from the surrounding region where a solar farm project is located is broadly consistent with other projects in Australia. It is, however, acknowledged that the solar farm projects constructed in Australia to date have typically been up to 200 MW in size.

An assessment of workforce locality was most recently conducted in September 2022. The assessment estimated that 38% of site workers are based locally, 42% of site workers are based in the broader region within NSW, and 20% of the workforce are based nationally. This is consistent with the previous assessment conducted in May 2022, which indicated 36% of site workers are based locally, 43% of site workers are based in the broader region within NSW, and 21% of the workforce are based nationally.

4.2 Recruitment strategy

General economic impact management measures include:

- ensuring 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 are able to demonstrate a cultural fit with the organisation;
- participation in business group meetings⁴, events or programs in the regional community designed to make regional businesses aware of upcoming contracting opportunities and requirements; and
- encouraging lead contractors to purchase local non-labour inputs to production, where local producers can be cost and quality competitive, to support local industries;

A local business participation program will be undertaken to attract and engage local workers. This program will consist of three steps:

- Step 1 - Expressions of interest
Businesses with an ABN register their business and submit expressions of interest on the ICN Regional Gateway. Businesses which have registered their interest with ACEN or the EPC contractor prior will be directly contacted by the EPC contractor and notified of the EOI process.
- Step 2 - Further information
The EPC contractor with ACEN's support will hold information sessions in Uralla, Armidale and Tamworth to provide local businesses with additional information about the available work packages and the process of bidding for subcontracting or supply opportunities with the main subcontractor(s). The database prepared by the EPC contractor in step 1 will be used to contact interested business to participate in the information sessions.
- Step 3 - Engagement of suppliers and subcontractors
The EPC contractor and main subcontractor(s) engage the suppliers and subcontractors directly according to their procurement processes. A target local worker ratio may be imposed to allow an estimate of non-local workers and to measure effectiveness of the Strategy.

ACEN will engage with relevant stakeholders such as Business Chambers and Councils in Uralla, Armidale and Tamworth, prior to construction, and on an 'as needed' basis during the construction stage of the Project. This would allow ACEN to communicate the timing of upcoming construction activities, provide local businesses with advanced notice of resource needs and allow the businesses to plan for material needs and peaks and troughs in demand.

ACEN will also set up a dedicated employment opportunity platform on the Project's homepage [<https://www.newenglandsolarfarm.com.au/>] in coordination with the EPC contractor. Relevant worker details will then be shared with the main subcontractor(s) for direct engagement through their own employment processes.

⁴ Note that due to COVID-19 restrictions, any meetings or community session may need to be held through web conferencing

4.3 Prioritising local employment

ACEN will support local employment opportunities and this has been communicated to the local community at each of the community information and drop-in sessions and within media releases. There will continue to be a preference for employment of local and regional residents where they are able to demonstrate relevant skills and experience and a cultural fit with ACEN, the EPC contractor and the relevant subcontractor(s).

Local employees are highly desirable where relevant skills are available, since these employees will avoid the costs associated with provision of transportation, meals and accommodation that are associated with a transient workforce. This applies to both the construction workforce with a peak number of up to 450 people, and the operation workforce of up to 15 people.

ACEN will seek to maximise local participation in the construction and operation of the Project, where relevant skills and trades are available. ACEN has encouraged local businesses and community members to express their interest to participate in the construction of the Project via email and through a purpose-built form on the Project website, which simplifies the application process and collects relevant details. Once the EPC contractor is appointed by ACEN, the database will be shared for them to approach desired candidates. The EPC contractor will also organise supplier sessions, which will be run in conjunction with ACEN and the relevant subcontractors.

The purpose of the sessions will be to help local businesses and interested suppliers better understand how they can apply for work, the types of jobs that are available and the metrics that the construction contractor will consider.

ACEN has also committed to supporting local employment opportunities by encouraging the subcontractors to engage local businesses to supply goods and services, provided the required level of reliability, quality and financial competitiveness can be satisfied.

5. Accommodation Strategy

The Project will have both positive and negative impacts on accommodation in the regional area, dependant on the extent to which accommodation demand exceeds the level of occupancy for existing accommodation.

Accommodation for construction workers is likely to be sourced from nearby centres, such as Armidale, Uralla, Walcha and Tamworth, either workers residing in their own homes or through temporary accommodation. A significant proportion of the Project's non-local construction workforce may be required to reside at local short-term and rental accommodation during the peak period of construction. An influx of workers requiring accommodation to facilitate the construction of the Project could place pressure on local short-term accommodation and 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 tourist periods such as school holidays and the region's major festivals and annual events.

Following feedback from a number of local residents, ACEN removed the construction accommodation village (CAV), which was originally proposed as part of the development application for the Project. Since the submission of the EIS (including the RTS and AR), ACEN has continued to investigate potential alternatives to housing the Project's non-local employees during construction. This has included consultation with potential construction contractors and accommodation service providers, including the UNE located only 25 km to the north of the Project.

As a result of these ongoing investigations, ACEN is confident that a large component of the Project's construction and operations workforce will be sourced from local workers within the neighbouring Armidale and Tamworth local government areas, and as such will not need 'Project' accommodation. A number of construction contractors have confirmed this based on experiences working on other large-scale solar developments in regional NSW. In addition, it is anticipated that local landlords will also play a more significant role in providing short-term accommodation services for the Project's non-local employees than what had originally been assumed.

Actions to encourage local accommodation are presented in Table 6.2 in Section 6.

5.1 Short-term accommodation

Average occupancy rates in Uralla and Armidale LGAs are typically around 60 %, with occupancy rates in Tamworth generally consistent around 50 %, with occupancy rates increasing to 100 % during peak periods. Refer to section 4.7.3 and 4.7.4 of Appendix N of the EIS for further detail on occupancy rates and estimates. (EMM 2019).

Peak occupancy periods typically relate to Queensland and NSW school holidays, UNE graduation periods and local and regional events such as the Thunderbolts Festival and Tamworth Country Music Festival. Table 5.1 presents the major festivals and annual events in the region in 2022 and 2023. During these periods, the region's supply of temporary short-term accommodation is almost completely utilised. As such, consideration of possible mitigative measures to reduce the Project's impacts and utilisation of local accommodation during these periods may be required to reduce impacts to the local community.

Tables 5.2, 5.3, 5.4 and 5.5 provide the approximate number of rooms available within Walcha, Uralla, Armidale and Tamworth respectively. The room numbers do not consider caravans (powered/unpowered sites) or camp sites. Periodic consultation occurs with key accommodation providers being used by GLC employees and site personnel to confirm availability during construction.

Table 5.1 - Major festivals and annual events

Location	Event	Indicative Start Date	Indicative End Date
Armidale	Armidale Spring Games	30-Sep-22	2-Oct-22
Armidale	TroutFest	7-Oct-22	9-Oct-22
Armidale	New England Sings	23-Oct-22	23-Oct-22
Armidale	UNE Graduations	8-Dec-22	10-Dec-22
Armidale	UNE Graduations	Aug-23	Aug-23
Tamworth	National Thunder Motorcycle Rally	30-Sep-22	3-Oct-22
Tamworth	Fiesta La Peel	15-Oct-22	15-Oct-22
Tamworth	Country Music Festival	13-Jan-23	22-Jan-23
Tamworth	NCHA Futurity	Jun-23	Jun-23
Uralla	Thunderbolt Festival	29-Oct-22	30-Oct-22
Uralla	Uralla Show	Feb-23	Feb-23
Uralla	Seasons of New England	25-Mar-23	25-Mar-23
Uralla	Uralla Lantern Parade	26-Mar-23	26-Mar-23
Uralla	Uralla Gold Club Veterans Event	Apr-23	Apr-23

The approximate available resources within Walcha, Uralla, Armidale and Tamworth are provided in Tables 5.2, to 5.5 respectively. It should be noted that only the capacity in terms of the number of rooms or cabins is listed, not necessarily the number of people that each room or cabin can accommodate.

Table 5.2 - Accommodation providers in Walcha

Walcha accommodation provider	Approximate capacity
Walcha Caravan Park	11 cabins
Apsley Arms Hotel	7 rooms
Commercial Hotel	4 rooms
Walcha Road Hotel	3 cabins
Walcha Royal Cafe & Accommodation	10 rooms
New England Hotel Motel	10 rooms
Walcha Motel	19 rooms
Total rooms	64

Table 5.3 - Accommodation providers in Uralla

Uralla accommodation provider	Approximate capacity
Altona Motel	16
Aurelia's Farm	2
Bushranger Motor Inn	17
Country Road Caravan Park	8 rooms
Dingle B&B	2
Elmswood B&B	1
Grace Cottages	2 cottages
Harlow Park Horseriding	3
Ticino B&B	2
Thunderbolt Inn	7
Top Pub	14
Wayward Jerseys Farmstay	3
Sentry Box Boer Goat Stud & Farmstay	1
Lakeside Lodge B&B	4
Woodhaven Cottage B&B	1
Kentucky B&B	1
Lochiel Cottage	3
Retreat Shearers Quarters	3
Myanbah Cottages	5
Total rooms	95

Table 5.4 - Accommodation providers in Armidale

Armidale accommodation provider	Approximate capacity
UNE Residential System – short-term accommodation	100 rooms
Country Comfort Armidale	42 rooms
Lindsay House Country Hotel	5 rooms
City Centre Motor Inn Armidale	40 rooms
Petersons Armidale Winery & Guesthouse	7 rooms
Moore Park Apartments	3 bedrooms
Hideaway Motor Inn Armidale	22 rooms
Alluna Motel	20 rooms
Abbotsleigh Motor Inn	32 rooms
Quality Hotel Powerhouse Armidale	57 rooms
Moore Park Inn	20 rooms
Armidale Pines Motel	19 rooms
Deer Park Motor Inn	24 rooms
Armidale Motel	21 rooms
Elite Motor Inn	14 rooms
Estelle Kramer Motor Inn	7 rooms
Sandstock Motor Inn Armidale	12 rooms
Club Motel	18 rooms
Cedar Lodge Motel	2 suites
New England Motor Inn	10 rooms
Acacia Motor Inn Armidale	15 rooms
Cotswold Gardens	24 rooms
Armidale Tourist Park	9 rooms
Townsmart	1 apartment
Armidale Cottage	1 room
White Lanterns Motel	13 rooms
Westwood Motor Inn	17 rooms
Westside Studio Apartments	9 rooms
Belmont New England	4 rooms
Loloma Bed and Breakfast	2 rooms
Armidale Rose Villa Motel	10 rooms
Guyra Summit Caravan Park	50 rooms
Top of the Range Retreat	3 rooms
Total rooms	633

Table 5.5 - Accommodation providers in Tamworth

Tamworth accommodation provider	Approximate capacity
Best Western Sanctuary Inn	60 rooms
Quest Tamworth	40 rooms
Quality Hotel Powerhouse	81 rooms
City Sider Motor Inn	38 rooms
CH Boutique Hotel	62 rooms
The Tamworth Hotel	14 rooms
Aaron Cottage	3 rooms
Almond Inn Motel	27 rooms
The Duck Inn Apartments	6 rooms
Kootingal Land view Motel	12 rooms
Tamworth City Motel	31 rooms
Motel Grande Tamworth	11 rooms
Motel 359	55 rooms
Golden Grain Motor Inn	13 rooms
Country Capital Motel	31 rooms
The Roseville Apartments	3 rooms
Abraham Lincoln Motel	15 rooms
Ibis Styles Tamworth	108 rooms
Best Western Motor Inn	29 rooms
Tamworth Lodge Motel	17 rooms
Sundance Park Motel	25 rooms
Amberoo Apartments	14 rooms
Econo Lodge	60 rooms
Tamworth Central Motel	5 rooms
Mercure	52 rooms
Town & Country Motor Inn	18 rooms
Best Western Plus All Settlers Motor Inn	20 rooms
The Stagecoach Motor Inn	24 rooms
Roydons Motor Inn	12 rooms
Colonial Inn	33 rooms
Edward Parry Motel & Apartments	15 rooms
McNevin's Tamworth Motel	24 rooms
City Gate Motel	11 rooms

Tamworth accommodation provider	Approximate capacity
Tamwell Motel & Coffee Lounges	16 rooms
Golden Guitar Motor Inn	30 rooms
Cadman Motor Inn & Apartments	20 rooms
Golf Links Motel	21 rooms
Motabelle Holiday Units	9 rooms
Ashby House Motor Inn	21 rooms
Studio 637	2 rooms
The Retreat at Frog Moore Park	5 rooms
Total rooms	1093

5.2 Rental accommodation

The proportion of occupied private dwellings generally reflects the non-metropolitan state average in most of the local areas, but mostly below the NSW overall percentage. There is a general dominance of separate houses, as opposed to semi-detached or apartment dwellings. Uralla Shire LGA has a slightly higher rate of separate house dwellings in comparison to Tamworth and Armidale LGAs, mostly due to these areas being established as regional city areas, with greater populations and more diverse dwelling types.

A review of long-term rental housing available in the main towns and communities within the study area was undertaken in 2021 using various websites. Table 5.6 reviews the long-term housing availability. There was a higher proportion of dwellings being purchased and a lower proportion being rented in the Uralla Shire LGA in comparison to Tamworth and Armidale LGAs.

Table 5.6 - Long-term rental housing availability

Location	House and unit size				Approximate total number of properties available for rent
	1-BR	2-BR	3-BR	4+-BR	
Uralla		3	1	2	6
Walcha			1		1
Armidale	27	37	46	24	134
Tamworth	22	72	67	32	193
Total	49	112	115	58	334

Source: www.realestate.com.au; domain.com.au; rental.com.au

As identified in Table 5.6, in 2021 there were 112 properties available across the region with two-bedroom rentals and 173 properties available with three- and four or more bedrooms for rent, with a total of 334 rental properties available.

A review of the local property and real estate websites identified publicly advertised rental properties. Most of the properties on the rental market are for family use as they offer more than one bedroom. The majority of the rental properties identified as part of this review are three- to four-bedroom houses within the Armidale LGA.

There are minimal one-bedroom units available for rent in Walcha and Uralla. One-bedroom rental properties are also not publicly available in a number of surrounding townships and rural localities, including Arding and Invergowrie.

Based on this review, it appears that there may be potential rental properties available for rent during construction. However, these options are mainly for family-based, larger household configurations. There are limited opportunities for one-bedroom units in proximity to the Project. Given that the construction period is estimated to take approximately 40 months, it has been assumed that some of the workers are likely to relocate their families to the local area. It has also been assumed that those relocating with their families would demonstrate similar household characteristics (e.g. household size) to those of NSW (averaged).

5.3 Prioritising local accommodation

Consent condition 28 states that this Strategy is to ensure that there is sufficient local accommodation for the workforce available in the area. Consultation will be undertaken with local councils (Uralla Shire Council, Armidale Regional Council and Tamworth Regional Council) to identify unexpected pressures on local facilities due to the Project. Should these pressures be identified by any of the listed councils, ACEN and GLC will provide phone numbers of their respective representatives to be contacted directly by council staff. The NESF website (<https://newenglandsolar.com.au/contact-us/>) includes contact details.

To help priorities local accommodation, GLC will establish a phone hotline and project email which can both be used by accommodation providers as an open and direct communicate platform with GLC. This will give providers comfort that any issues relating to project staff can be reported directly to GLC. General enquiries can be sent via email to info@newenglandsolarfarm.com.au or via phone at 1300 250 479.

Utilising existing accommodation in Walcha, Uralla and Armidale is the most favourable option for several reasons:

- it minimises daily travel time to the site for workers. Travel times by car from Uralla are as follows:
 - Uralla to Armidale: 15-20 minutes (25 km)
 - Uralla to Walcha: 25-30 minutes (40 km); and
 - Uralla to Tamworth: 60 minutes (90 km)
- it maximises accessibility to local business services in Uralla that may be used by the workforce (e.g. cafes, restaurants, supermarkets, service stations and retail services); and
- it maximises economic benefits for the local economies.

The priorities for using local accommodation for the construction workforce, in order of preference, is detailed in Table 5.7.

Table 5.7 - Accommodation priorities

Priority	Accommodation type	Approximate total	Availability *
1	Short term local temporary accommodation (rooms) such as motels, hotels, caravan parks and B&Bs in Uralla, Armidale and Walcha	792	475
2	Rental accommodation in Uralla, Armidale and Walcha (houses and units)	141	141
3	Short term local temporary accommodation such as motels, hotels, caravan parks and B&Bs in Tamworth	1093	546
4	Rental accommodation in Tamworth (houses and units)	193	193
	Total (approximate)	2219	1355

* Room availability based on an occupancy rate of 60 % for Walcha, Uralla and Armidale, and 50 % for Tamworth (Section 5.1)

As identified in Table 5.7, based on an occupancy rate of 60 % for Uralla and Armidale, and 50 % for Tamworth for short-term accommodation outside of peak periods, the total number of rooms within a 40 km radius from the Project is estimated at 616. Within a 100 km radius, this estimate increases to approximately 1355.

Combining the priority to maximise local employment with the expectation that approximately 50 % of the peak construction workforce of 450 workers will originate from the Uralla, Armidale and Tamworth LGAs, the total number of rooms required at the peak of construction would be approximately 225. With approximately 616 rooms available in the Uralla, Walcha and Armidale LGAs at normal occupancy rates, there is likely to be sufficient accommodation for the workforce at all times.

It is not expected that major events in Tamworth will have any effect on the availability of accommodation in Uralla, Armidale or Walcha.

As detailed in Section 3.2, based on currently available information, it is assumed that the other State significant developments in the area that are either approved or proposed would have an impact on the local and regional availability of short-term or rental accommodation. However, as no construction schedule for the Metz Solar Farm is available at time of writing, the cumulative effect on accommodation will form part of the regular monitoring for this Strategy.

6. Strategy Implementation

6.1 Action plans

As detailed in Table 6.1 and Table 6.2, implementation actions have been developed to achieve the respective employment and accommodation objectives of the Strategy, which are to encourage and prioritise local employment for the NESF, and where non-local contractors or workers are recruited, to prioritise the use of local accommodation in Uralla, Armidale and Walcha. Note that the actions are not listed in order of priority.

Table 6.1 - Actions to encourage local employment

No.	Action	Timing
1	Host information sessions to engage with the community and local businesses who can provide inputs or services and other prospective contractors/subcontractors, regarding construction timing, workforce estimates and accommodation requirements.	Prior to construction
2	Engage local media including radio, newspaper and social media to advertise expressions of interest for employment or provision of services or materials	Prior to construction
3	Engage with the local employment agencies to identify access pathways for local workers. Assess the candidate pool to determine suitable labour, trade or other employment on the Project.	Prior to construction
4	Investigate any local and regional community social media channels which can disseminate information to the community and local businesses which can provide inputs or services and prospective subcontractors	Prior to and during construction
5	Set up a dedicated employment opportunity platform on the Project's website [https://www.newenglandsolarfarm.com.au/] in consultation and coordination with the EPC contractor. Relevant worker details will then be shared with the main subcontractor(s) for direct engagement through their own employment processes.	Prior to and during construction
6	Consult with the Uralla Shire, Armidale and Tamworth Business Chambers and the New England North West Business Enterprise Centre to provide their members with relevant details such as Project construction timing, workforce estimates and accommodation requirements.	Prior to construction
7	Implement shuttle bus services where practical to enable local workforce in the respective locations to easily commute to the project site. These services may discontinue depending on demand.	Prior to and during construction
8	Encourage businesses with an ABN register their business and submit expressions of interest on the ICN Regional Gateway	Prior to and during construction
9	Provide opportunities for local businesses to submit proposals and tenders and prioritise the use of goods and services that can be sourced locally and are competitive for price and quality	Prior to and during construction, commissioning and operation
10	Encourage subcontractors to employ local workers wherever possible and reasonable	Prior to and during construction, commissioning and operation
11	Use local presence and content as a criterion when awarding contracts to subcontractors	Prior to and during construction, commissioning and operation

No.	Action	Timing
12	Identify positions where training would allow additional local workers, and encourage local workers and businesses to undertake training to provide for specialist works	Prior to and during construction, commissioning and operation
13	Consultation frameworks with local providers to ensure fairness, open communication and forward planning, and grievance mechanisms via implementation of ACEN and EPC codes and policies	Prior to and during construction, commissioning and operation

Table 6.2 - Actions to encourage local accommodation

No.	Action	Timing
1	Explore available accommodation options in Uralla, Armidale, Walcha and Tamworth to accommodate the workers (refer to Tables 5.2 to 5.5 respectively).	This AES
2	Prioritise practical local accommodation options (refer to Table 5.7)	This AES
3	Host information sessions to engage with the community and local businesses who can provide inputs or services and other prospective contractors/subcontractors, regarding construction timing, workforce estimates and accommodation requirements.	Prior to construction
4	Investigate local and regional community social media options to disseminate information to local accommodation operators and rental property owners, such as construction timing, workforce estimates and accommodation requirements.	Prior to construction
5	Host information sessions to engage with Council, the community and local businesses regarding construction timing, workforce estimates and accommodation requirements.	Prior to and during construction, commissioning and operation
6	Consult with Uralla Shire Council, Armidale Regional Council and Tamworth Regional Council to minimise pressure on local resources.	Prior to and during construction, commissioning and operation
7	Contact the local accommodation operators to provide Project information such as construction timing, workforce estimates and accommodation requirements.	Prior to and during construction, commissioning and operation
8	Provide a register of local accommodation options and contact details to contractors and subcontractors.	Prior to and during construction, commissioning and operation
9	Maintain a register of local property owners who have expressed interest in offering dwellings for rent. Provide this register to contractors and subcontractors.	Prior to and during construction, commissioning and operation
10	Review workforce predictions every six months during construction to ensure that accommodation requirements are met in accordance with the objectives of this AES.	Prior to and during construction, commissioning and operation
11	Identify any overlaps with peak demand periods for accommodation during the following six months and engage with key stakeholders.	Prior to and during construction, commissioning and operation

No.	Action	Timing
12	Maintain a register of local, regional and national workforce breakdown by company on site	Prior to and during construction, commissioning and operation
13	Regularly consult with local property owners and accommodation providers to manage occupancy to maximise use of local accommodation, without preventing its use for major event and holiday purposes.	Prior to and during construction, commissioning and operation
14	All workers to subscribe to ACEN and EPC Contractor company policies and procedures, including Codes of Conduct (Attachment C).	Prior to and during construction, commissioning and operation

6.2 Provision of medical support

A commitment to provide medical support was described in the EIS, specifically to alleviate pressure on the two General Practitioners (GPs) in Uralla. Three key measures to manage this matter are:

- The Project site includes an Emergency Response Team and a First Aid room. The First Aid room is located at the main site compound.
- GLC has engaged with medical services in Uralla, Walcha, Armidale, and Tamworth to identify levels of service in each jurisdiction and incorporate this into its onsite medical procedures.
- The concentration of workers will be spread across the region (i.e. Uralla, Walcha, Armidale, and Tamworth) and therefore the spread of potential medical services required will also be distributed throughout the region (in particular, Armidale and Tamworth have more advanced medical services than Uralla).

6.3 Monitoring and reporting

Leading up to and during construction, the Strategy will be reviewed at least biannually (every six months), cognisant of changes in the construction schedule or circumstances regarding accommodation. For example, prior to a significant increase in workforce requirement or following a change in restrictions due to COVID-19.

Monitoring of the plan will be conducted concurrently with the review of this strategy (ie every six months as a minimum leading up to and during construction).

The monitoring program will be undertaken to gauge the status of meeting the Strategy objectives in regard to maximising use of local accommodation; prioritising local employment; suitability of the Strategy for workforce predictions and accommodation availability; and incorporating feedback from Council, accommodation providers and other stakeholders.

The monitoring program includes:

- a review of workforce requirements, and ratio of local workforce to non-local workforce (once this has been established);
- a review of accommodation availability (including forward-looking bookings), utilisation and any actual or perceived impacts;

- consultation with Council, accommodation providers, and other stakeholders where required;
- a review of any relevant complaints and control measures; and
- a review of any impacts on the Strategy outside of ACEN's control (e.g. COVID-19, refer below).

The results of the monitoring results will be reviewed, assessed and reported from GLC to ACEN and where relevant, changes to the AES or action plans may be made to achieve the objectives for the provision of adequate local accommodation and prioritising local employment. The monitoring results will also be provided to DPE and Council if requested.

During operations, monitoring and reviewing of this strategy will occur if requested by the Council or DPE.

Consideration of COVID-19

It is possible that COVID-19 may change the availability of previously identified accommodation options, which may at any time be subject to restrictions that reduce the number of rooms available. Similarly, it is possible that COVID-19 may cause changes to working arrangements and restrict or constrain workforce numbers required during Project construction and/or commissioning.

To address any potential impacts of COVID-19 on the Project, the following will be undertaken as part of the regular monitoring program:

- liaise with previously identified accommodation providers to clarify currently available accommodation;
- liaise with potential workforce providers to clarify any potential restrictions that may impact assumed workforce availability;
- undertake a risk assessment in consultation with the EPC contractor to determine the potential effects of any shortfalls in accommodation availability or workforce restrictions; and
- describe in the monitoring results how any potential impacts on accommodation or workforce from COVID-19 will be managed.

6.4 Record keeping

ACEN has a comprehensive data management system for the NESF that outlines the policies and procedures that will be implemented to ensure that all data is managed in a consistent, efficient and effective manner. All monitoring data and reports relevant to this Strategy will be managed through this system.

6.5 Evaluation and review

The evaluation and review of this Strategy will occur every 6 months during construction and in accordance with the requirements of the CoC, specifically conditions 2 and 3 of Schedule 4; and the continuous improvement requirements of the EMS. The reason(s) for any revision (if required) shall be clearly summarised on the front page of this Strategy.

As per Schedule 4, consent condition 2, any revision of the Strategy requires approval by the Secretary prior to implementation.

References

NSW Department of Education – School Infrastructure (2020)
<https://www.schoolinfrastructure.nsw.gov.au/projects/a/armidale-secondary-college.html>, accessed 5 October 2020

EMM (2019) New England Solar Farm: Environmental Impact Statement. Prepared for UPC Renewables Australia Pty Ltd, February 2019.

Attachment A - Council Consultation Record

From: Tim Kirk <Tim.Kirk@upc-ac.com>
Sent: Wednesday, 2 December 2020 10:50 AM
To: Matt Clarkson
Cc: Terence Seymour
Subject: Re: Accommodation and Employment Strategy - New England Solar Farm UPC email to Tim Kirk 1 December 2020

Great, thank you Matt

This strategy will now be submitted to the Department for its approval.

Kind Regards,

Tim Kirk | Project Development Manager
UPC\AC Renewables Australia
A UPC Renewables and AC Energy Company



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From: Matt Clarkson <MClarkson@uralla.nsw.gov.au>
Date: Wednesday, 2 December 2020 at 10:30 am
To: Tim Kirk <Tim.Kirk@upc-ac.com>
Cc: Terence Seymour <TSeymour@uralla.nsw.gov.au>
Subject: RE: Accommodation and Employment Strategy - New England Solar Farm UPC email to Tim Kirk 1 December 2020

Hi Tim

Apologies for not getting back to you.

Council has reviewed the strategy and proposes no amendments.

Regards
Matt Clarkson
Manager of Development and Planning

Uralla Shire Council | Po Box 106 Uralla NSW 2358
p 02 6778 6310 | **f** 02 6778 6349 | **m** 0419 861 719



From: Tim Kirk [mailto:Tim.Kirk@upc-ac.com]
Sent: Wednesday, 2 December 2020 10:15 AM
To: Matt Clarkson
Subject: Re: Accommodation and Employment Strategy - New England Solar Farm

Hi Matt,

Hope you're well.

Just wondering how you are going with your review of the Accommodation and Employment Strategy?

Please let me know if you have any questions I can help with.

Kind Regards,

Tim Kirk | Project Development Manager
UPC\AC Renewables Australia
A UPC Renewables and AC Energy Company



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Melbourne: 61 Cromwell Street, Collingwood VIC 3066

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From: Matt Clarkson <MClarkson@uralla.nsw.gov.au>
Date: Saturday, 21 November 2020 at 4:28 am
To: Tim Kirk <Tim.Kirk@upc-ac.com>
Cc: Terence Seymour <TSeymour@uralla.nsw.gov.au>
Subject: RE: Accommodation and Employment Strategy - New England Solar Farm

Thanks Tim.

That should be fine.

Regards

Matt Clarkson
Manager of Development and Planning

Uralla Shire Council | Po Box 106 Uralla NSW 2358
p 02 6778 6310 | f 02 6778 6349 | m 0419 861 719



From: Tim Kirk [<mailto:Tim.Kirk@upc-ac.com>]
Sent: Friday, 20 November 2020 5:50 PM
To: Matt Clarkson
Cc: Terence Seymour
Subject: Re: Accommodation and Employment Strategy - New England Solar Farm

Hi Matt,

We certainly recognise the importance of this particular strategy to council as it does respond to many of the council's initial concerns regarding the project.

As this plan needs to go through the Department for approval, it would be appreciated if we could receive the Council's feedback by the end of next week.

Enjoy your weekend,

Tim Kirk | Project Development Manager
UPC\AC Renewables Australia
A UPC Renewables and AC Energy Company



M: [+61 403 857 079](tel:+61403857079)
E: tim.kirk@upc-ac.com

Hobart: Suite 2, Level 2, 15 Castray Esplanade, Battery Point, TAS 7004
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From: Matt Clarkson <MClarkson@uralla.nsw.gov.au>
Date: Friday, 20 November 2020 at 3:36 pm
To: Tim Kirk <Tim.Kirk@upc-ac.com>

Cc: Terence Seymour <TSeymour@uralla.nsw.gov.au>

Subject: RE: Accommodation and Employment Strategy - New England Solar Farm

Hi Tim

This did seem like one of the bigger 'unknowns' for Council moving forwards, and I've fielded many calls from sundry parties interested in provision of the accommodation: some have obviously had conversations with UPC, and at the other end of the spectrum are some opportunistic landholders.

What is your desired timeframe for a considered response?

Regards

Matt Clarkson

Manager of Development and Planning

Uralla Shire Council | Po Box 106 Uralla NSW 2358

p 02 6778 6310 | **f** 02 6778 6349 | **m** 0419 861 719



From: Tim Kirk [<mailto:Tim.Kirk@upc-ac.com>]

Sent: Friday, 20 November 2020 2:30 PM

To: Matt Clarkson

Subject: Accommodation and Employment Strategy - New England Solar Farm

Hi Matt,

Hope you've been well.

UPC\AC Renewables has prepared the Accommodation and Employment Strategy for the New England Solar Farm, pursuant to Schedule 3 Clause 28 of the New England Solar Farm Development Consent. It would be much appreciated if you could provide any feedback on this strategy before it is submitted to the Department.

Please let me know if you wish to discuss any aspect of this strategy.

Kind Regards,

Tim Kirk | Project Development Manager

UPC\AC Renewables Australia

A UPC Renewables and AC Energy Company

UPC\AC Renewables
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Attachment B - DPIE Approval Letter

Mr Tim Kirk
Project Development Manager
UPCVAC Renewables Australia
Level 14
77 King St
SYDNEY NSW 2000

11/02/2021

Dear Mr Kirk

**New England Solar (SSD 9255)
Accommodation and Employment Strategy (Stage 1)**

I refer to the Accommodation and Employment Strategy which was submitted in accordance with condition 28 of Schedule 3 of the development consent for the New England Solar Farm (SSD 9255).

The Department has carefully reviewed the document and is satisfied that it addresses the requirements of Condition 28 of Schedule 3 of the development consent.

Accordingly, the Planning Secretary has approved the Accommodation and Employment Strategy (Revision 1, dated 17 December 2020). Please ensure that the approved plan is placed on the project website at the earliest convenience.

If you wish to discuss the matter further, please contact May Patterson on 8275 1190 or may.patterson@planning.nsw.gov.au.

Yours sincerely



Nicole Brewer
Director
Energy Assessments

As nominee of the Planning Secretary

Attachment C - Construction Workforce Code of Conduct

NEW ENGLAND SOLAR FARM

Construction Workforce Code of Conduct

Document Number: NESF-OWD-EN-00GRL-REP-001

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1. Introduction

This Code of Conduct (the Code) outlines the standard of behaviour expected by all persons working at the New England Solar Farm (NESF) and while utilising temporary accommodation in the area during construction.

The purpose of the Code is to promote a safe, healthy and productive workplace at the NESF and promote acceptable behaviour for the workforce while residing in the NESF area during its construction. The Code's key principles are:

- act with professionalism, honesty, integrity and fairness;
- uphold specified standards of behaviour;
- treat others with respect and dignity;
- maintain a safe working environment;
- respect and maintain privacy and confidentiality; and
- identify and manage conflicts of interests.

These principles are explained in more detail throughout the Code.

The Code does not, and cannot, cover every possible action or scenario you may encounter at the NESF, however the Code's intent is to assist you understand expectations while working at the NESF and while residing in the NESF area during construction.

It is important that you understand the Code, and that a breach of the Code is a serious contravention of your working arrangement at the NESF, and may result in action being taken including termination of your employment or other engagement.

Where you feel that you are uncertain about your own position, or if you have any concerns about potential breaches of the Code, you are encouraged to raise this promptly with your immediate supervisor or manager, or another person with management responsibility.

2. Scope

The Code applies to all persons working at the NESF including at accommodation in the NESF area during construction.

The standards of behaviour set out in the Code are expected of you both during work hours and whenever your behaviour has the potential to impact UPC/AC Renewables Australia or Green Light Contractors, or your relationships with other workforce personnel. This may include but is not limited to:

- lunch or other breaks;
- a work trip conducted outside normal working hours;
- while at accommodation in the area during construction of the NESF;
- social functions with fellow workers (e.g. work functions or events); and
- activities on social media.

3. Standards of behaviour

3.1 ETHICAL STANDARDS OF BEHAVIOUR

UPC\AC Renewables Australia and Green Light Contractors are committed to maintaining the highest standards of professionalism, honesty, integrity and fairness. You must act in a manner consistent with this commitment by:

- respecting cultural, ethical and religious differences;
- being courteous, sensitive and honest in communications, and being considerate of the needs of others;
- working cooperatively and collaboratively with others to achieve common goals and to maintain a harmonious work environment and culture;
- behaving in a fair, consistent and ethical manner;
- not taking advantage of any property or information in relation to the NESF for personal benefit;
- taking all steps to ensure the protection of NESF assets, premises and resources; and
- abiding by all applicable laws and regulations.

There are several questions that personnel should ask when confronted with work related decisions. By way of illustration, you should ask yourself:

- Is it illegal?
- Would there be negative consequences for the NESF, UPC\AC Renewables Australia or Green Light Contractors?
- Would I prefer to keep this a secret?
- Would I be embarrassed if my actions were made public?

If the answer is yes to any of those questions, then your actions are likely to be in breach of the Code and what is expected of you.

3.2 UNACCEPTABLE BEHAVIOUR

UPC\AC Renewables Australia and Green Light Contractors will not tolerate unacceptable or inappropriate behaviour that impacts, or has the potential to impact, adversely on other personnel, or the company. Unacceptable and inappropriate behaviour includes, but is not limited to, the following:

- harassment, bullying or victimisation, physical abuse or assault;
- threatening or intimidating behaviour towards others;
- ignoring safety and security procedures or standards;
- breach of relevant laws or regulations;
- theft or attempted theft;
- failure to disclose a conflict of interest, or potential conflict of interest;
- activities adversely affecting UPC\AC Renewables Australia and Green Light Contractors reputation, including social media.

Any instances of misconduct will likely lead to disciplinary action, including possibly the termination of personnel's employment or engagement or removing access to site.

3.3 DRUGS AND ALCOHOL

UPC\AC Renewables Australia and Green Light Contractors are concerned by factors affecting an employee's ability to safely and effectively do their work to a satisfactory standard. The company recognises that alcohol or other drug abuse can impair short-term or long-term work performance and is an occupational health and safety risk. UPC\AC Renewables Australia and Green Light Contractors will do its utmost to create and maintain a safe, healthy and productive workplace for all employees. To achieve this, UPC Renewables and Green Light Contractors shall:

- maintain an alcohol and drug procedure and provide awareness training to all personnel (refer **GLC-IMS-HRE-PRC-014.00.IFU_Procedure - Alcohol and Other Drugs**);
- communicate and consult with its personnel to define the requirements of approved procedures and policies;
- conduct fair and appropriate testing in accordance with the alcohol and drug procedure and national testing standards; and
- prohibit the possession, use, or distribution of illegal substances.

UPC\AC Renewables Australia and Green Light Contractors has a zero-tolerance policy regarding the use of illicit drugs or the consumption of alcohol at the NESF, or while attending other business-related premises (e.g. clients) while under the influence of illicit drugs or alcohol. Contravening this policy will likely lead to disciplinary action, including possibly the termination of personnel's employment or engagement.

At times, during social events, the company may make alcohol available to staff over the age of 18. Limiting the consumption of any alcohol made available is the responsibility of the employee or contractor. Driving over the legal limit or under the influence of illicit drugs is illegal.

Further detail on UPC\AC Renewables Australia and Green Light Contractors alcohol and drug related requirements are within **GLC-IMS-HRE-PRC-014.00.IFU_Procedure - Alcohol and Other Drugs**. Note that this procedure does not form part of the terms and conditions of employment, and UPC Renewables and Green Light Contractors reserves the right to withdraw or vary it at any time.

3.4 SAFE WORKING ENVIRONMENT

UPC\AC Renewables Australia and Green Light Contractors will aim to operate a safe workplace that is free of injuries, property or equipment damage or environmental harm.

All personnel are responsible for their own safety and the safety and well being of others around them in the workplace and in the community that may be affected by their activities. This requires you to obey all reasonable instructions, work safely, wear protective equipment if required, follow correct procedures when working and report incidents.

You must comply with UPC\AC Renewables Australia and Green Light Contractors policies and procedures relating to health, safety, and the environment

3.5 INFORMATION AND PRIVACY

You must not use or communicate confidential and commercially sensitive information belonging to UPC\AC Renewables Australia or Green Light Contractors, for any purpose other than work purposes, unless you have express written permission to do so.

UPC\AC Renewables Australia or Green Light Contractors information includes intellectual property assets, such as patents, trademarks, copyright, design and other intellectual property assets. These assets are valuable assets which need to be protected, in the same way as physical assets.

You must not take improper advantage of any information gained in the course of your employment or engagement. If you do so, this could lead to serious consequences including disciplinary action or termination of your employment or engagement.

Following your employment or engagement at NESF you must not use confidential information and intellectual property obtained during your employment or engagement to advantage your prospective employer or business or disadvantage UPC Renewables or Green Light Contractors generally in its dealings with others.

Where your role involves handling the personal information of suppliers, customer or other employees, you need to take particular care to ensure that personal information is obtained in a fair and lawful manner, and that its use is limited to the purpose for which it is acquired.

4. ROLES AND RESPONSIBILITIES

4.1 RESPONSIBILITIES OF MANAGERS AND SUPERVISORS

Managers and supervisors must ensure they lead by example and strictly comply with the Code.

Managers and supervisors must take all reasonable steps to ensure all staff and contractors are aware of and comply with the Code. This includes ensuring all staff and contractors have received and continue to receive appropriate training.

Managers and supervisors must ensure they create an open and receptive environment in which employees feel comfortable enough to raise issues of concern. Upon becoming aware of such issues, managers and supervisors must promptly take action to address and escalate the issues as appropriate.

4.2 REPORTING BREACHES OF THE CODE

All personnel have a duty to observe the Code and ensure no breaches occur. Breaches require immediate attention and personnel have a duty to report known or suspected breaches of the Code.

Any personnel who in good faith, makes a complaint or disclosure about an alleged breach of the Code, will not be disadvantaged or prejudiced in the making of such a complaint or disclosure.

A complaint or disclosure should be made to your supervisor, or if you do not feel comfortable speaking to your supervisor to a more senior manager or another person with management responsibility.

4.3 CONSEQUENCES OF BREACHING THE CODE

Failure to comply with the Code will be considered a serious breach of UPC Renewables and Green Light Contractor requirements and will be investigated. Breaches of the Code may result in a range of personal consequences depending on the nature and severity of the breach, including termination of your employment or engagement.