

Prepared for X-Elio Pty Ltd

Accommodation and Employment Strategy

Forest Glen Solar Farm

Dubbo Regional LGA, NSW

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Acronyms and Abbreviations

ABS	Australian Bureau of Statistics
AES	Accommodation and Employment Strategy
APP	Aboriginal Participation Plan
CWO	Central West Orana
DPE	Department of Planning and Environment (NSW) (formerly DPIE)
DRC	Dubbo Regional Council
EIS	Environmental Impact Statement
EP&A Act	Environmental Planning and Assessment Act 1979 (NSW)
EPC	Engineering, Procurement and Construction
FTE	Full-time equivalent
GW	gigawatt
ha	hectare
HSE	Health, safety, and environment
km	kilometres
LALC	Local Aboriginal Land Council
LGA	local government area
MW	megawatt
MWh	megawatt hour
NSW	New South Wales
O&M	Operations and Maintenance
REDS	Regional Economic Development Strategy
REZ	Renewable Energy Zone
SAL	Suburb and Locality
SEIFA	Socio-economic indexes for Australia (ABS)
IRSAD	Index of relative socio-economic advantage and disadvantage (ABS)
SSD	State Significant Development
UCL	Urban Centre and Locality

1. Introduction

1.1. Background

X-Elio Pty Ltd (X-Elio), the Proponent, received development consent for the Forest Glen Solar Farm (SSD-9451258) on 28 February 2023. The Proponent is a Spanish company specialising in developing, constructing, financing, and operating first-class renewable and sustainable utility-scale energy projects. It has built more than 3 gigawatts (GW) of renewable energy and has a strong presence in more than ten countries. The Proponent opened an Australian office in 2017, and its first solar project in Australia, the 200MW Blue Grass Solar Farm, was officially opened in November 2022.

The Forest Glen Solar Farm (the Project) is located approximately 16 km west of Dubbo, New South Wales (NSW), within the Dubbo Regional Local Government Area (LGA). The Project involves constructing, operating and decommissioning a 110MW DC (90MW AC equivalent) solar farm and associated infrastructure. The development consent was granted by a delegate of the Minister for Planning and Public Spaces, NSW, under Section 4.38 of the NSW *Environmental Planning and Assessment Act 1979* (EP&A Act).

1.2. Project overview

The Project is located on rural land in Minore, approximately 16 km west of Dubbo and 23 km east of Narromine. Its development footprint is approximately 444 hectares (ha) of the 789 ha Project site.

The Project site is currently utilised for cropping and grazing (primarily oats and sheep). Most of the site has been cleared of woody vegetation and modified by historical farming practices. The site is surrounded by agricultural land with extensive remnant vegetation. There are three residents within the Project site: one is within the development footprint on the southern side, another is on the outside of the south-western boundary of the site, and the third is owned by the landowner and is outside the Project site.

1.3. Purpose

The Accommodation and Employment Strategy (AES) outlines the proposed approach and objectives for managing social impacts and opportunities for accommodation and employment associated with the construction and operation of the Project. This AES has been prepared to fulfil the requirements of Condition B29 of Schedule 2, Part B of the *Development Consent* for the Forest Glen Solar Farm.

A compliance matrix for this AES and Schedule 2, Condition B29 is presented below in Table 1-1. A copy of this AES will be provided to the Planning Secretary prior to the commencement of construction and implemented throughout the construction as required by the *Development Consent*.

Table 1-1 Schedule 2, Condition B29 requirements (p.14)

Schedule	Condition	The relevant section of this AES
2	B29. Prior to commencing construction, the Applicant must prepare an Accommodation and Employment Strategy for the development in consultation with the Council. This strategy must:	

Schedule	Condition	The relevant section of this AES
	a) Propose measures to ensure there is sufficient accommodation for the workforce associated with the development;	Section 4.2 and Table 5-1
	b) Consider the cumulative impacts associated with other State Significant Development projects in the area;	Section 3.2 and 3.2.1
	c) Investigate options for prioritising the employment of local workers for the construction and operation of the development, where feasible; and	Section 5 and Table 5-1
	d) Include a program to monitor and review the effectiveness of the strategy over the life of the development, including regular monitoring and review during construction.	Section 5.3 and 6
	The Applicant must provide a copy of the Accommodation and Employment Strategy to the Planning Secretary prior to commencement of construction, and implement the plan throughout construction.	

1.4. Consultation

The AES identifies the Project's employment and accommodation requirements and considerations during the construction, operation, and decommissioning phases.

This development of this AES is informed by the Environmental Impact Statement (NGH & X-ELIO, 2021) of the Forest Glen Solar Farm and other relevant policies relating to the developer's and contractors' accommodation and employment strategies. Additionally, consultations with the Dubbo Regional Council (DRC) members and the accommodation and employment-providing industry of the DRC informed the development of AES. The consultation log is in Appendix A and in accordance with the Development Consent's condition A14 of Schedule 2, the DRC reviewed and provided input to the AES on 09 September 2024. The responses to the comments regarding where the changes in the AES were made was communicated to the DRC on 07 November 2024.

1.5. Governance

The AES is intended as an iterative document to be utilised by Project Managers and site-based teams to ensure consistent and coordinated implementation. The AES and associated commitments will be embedded into the Proponent contracts with nominated engineering, procurement, and construction (EPC) and operations and maintenance (O&M) contractors to ensure that the approach and requirements are consistent and coordinated and flow down through the tiers of subcontractors at all levels of the Project.

In accordance with *Development Consent's* Condition A13 of Schedule 2, the Proponent will ensure *"that all of its employees, contractors (and their subcontractors) are made aware of, and are instructed to comply with, the conditions of this consent relevant to activities they carry out in respect of the development"* (p. 6).

1.6. Review

If the AES requires a revision, as outlined in the Condition C2 of Schedule 2 of the *Development Consent* (p.14), the Proponent will update the AES to the satisfaction of the Planning Secretary prior to carrying out any upgrading or decommissioning activities on-site and review and, if necessary, revise the AES to the satisfaction of the Planning Secretary within one month of the:

- Submission of an incident report under Condition C10 of Schedule 2¹;
- Submission of an audit report under Condition C14, Schedule 2; or
- Any modification to the conditions of the development consent.

A periodic evaluation and review will be required to maintain the relevance of this AES to the changing circumstances and developments. The review process should be initiated with an approach to ensure that the strategy remains current and is updated to reflect changing circumstances, including changes resulting from upgrading or decommissioning, evolving opportunities, and ongoing improvements in the Proponent's approach, such as:

- Desired social procurement objectives are being achieved by the Proponent and its contractors
- There is positive evidence of delivery against social procurement objectives
- Social procurement methodology is at the leading edge of industry best practice.

If revisions to the AES are required, for example, to facilitate continuous improvement, respond to legislative changes, or address an actual or potential non-compliance, the Proponent's team will be responsible for revising the AES and submitting the updated AES to the Planning Secretary for approval. Following approval by the Planning Secretary, the revised AES will be published on the Project website.

¹ The *Development Consent* refers to as "Condition C10 of Schedule 4." However, there is no Schedule 4 in the *Development Consent*. Instead, incident and audit report are both in Schedule 2 of the *Development Consent*.

2. Regional context

The Project site lies in the locality of Minore, within the Dubbo Regional LGA in the Central Orana region of NSW, and within the Central-West Orana Renewable Energy Zone (CWO REZ). Major centres and/or towns in the area (Crow flies from the development site) are shown below in Table 2-1. For most residents of Minore, Dubbo is the main city providing access to social services and recreation. Narromine, 23 km west of the site, also provides these services.

Table 2-1 Proximal localities, towns and cities, distance, and demographics (ABS 2021 Census)

Location (ABS geography)	Distance from the development site	Population	First Nations population	Median age (years)	SEIFA IRSAD ² decile
Minore (SAL)	3 km west	194	12.4%	41	6
Dubbo (UCL)	16 km east	38,783	16.7%	35	4
Narromine (UCL)	23 km west	3,507	24.9%	39	2
Geurie (UCL)	37 km southeast	460	22.4%	41	4
Tomingley (SAL)	40 km southwest	342	11.1%	50	6
Trangie (UCL)	53 km northwest	768	28.4%	47	4
Wellington (UCL)	55 km southeast	4,581	27.4%	41	1
Peak Hill (UCL)	58 km southwest	768	34.0%	47	1
Gilgandra (UCL)	64 km north	2,417	20.2%	47	1

2.1. Population

In 2021, the estimated population of the Dubbo Regional LGA was 54,922 (ABS, 2021). The population is projected to grow to 63,599 people by 2041, an annual growth rate of around 0.8%. Migration into the area is predicted to account for almost 40% of this growth, and the region will see an increase in both younger and older age groups (DPE, 2022b). However, the neighbouring Narromine Shire LGA's population is predicted to decline from 6,360 residents in 2021 to 4,695 in 2041, an annual decrease of almost 1.5% driven largely by out-migration.

Key differences between the Dubbo Regional LGA compared to NSW at the time of the ABS 2021 Census include (ABS, 2021):

- Dubbo Regional LGA had a slightly younger population, with a median age of 36, compared to 39 for NSW

² Socio Economic Indexes for Areas (SEIFA) is a suite of indexes that have been created by the Australian Bureau of Statistics (ABS) from social and economic Census indicators. Each index ranks geographic areas across Australia in terms of their relative socio-economic advantage and disadvantage. The SEIFA scores are ranked and divided into deciles; a decile of 1 represents the lowest 10% of scores and relatively greater disadvantage, while a decile of 10 represents relatively greater advantage.

- Fewer residents in Dubbo Regional LGA had a tertiary degree (17%, NSW 28%)
- A higher proportion of Dubbo Regional LGA residents were born in Australia (82%, NSW 65%)
- More residents of Dubbo Regional LGA lived in separate houses (85%, NSW 66%)
- The median household weekly income was lower in the Dubbo Regional LGA (\$1,597) than the state median (\$1,829)
- Dubbo Regional LGA householders experience lower rates of housing stress than NSW residents, both for mortgage households (10% vs. 17%) and renter households (26% vs. 36%).

2.2. First Nations

The Project site is on the traditional lands of the Wiradjuri people. In 2021, 9,101 (16.6%) Dubbo Regional LGA residents and 1,300 (20.4%) Narromine Shire LGA residents identified as having Aboriginal and/or Torres Strait Islander origins, substantially higher than the NSW average of 3.4% (ABS 2021). Across both LGAs, the Aboriginal community was significantly younger than the non-Aboriginal population, with a median age of 23 years (Dubbo Regional LGA) and 24 years (Narromine Shire LGA) and a higher proportion of children under 15 years of age (34% and 35%) compared to the state average (22%).

Three Rivers Regional Assembly (TRRA) is the regional Aboriginal governance body for the Three Rivers region representing the interest of Aboriginal peoples across a large part of the Central West and Orana planning region. TRRA ensures Aboriginal communities have a genuine voice in determining services in the several LGAs, including Dubbo Regional, Gilgandra, Narromine, Bogan, Orange, Parkes and Warren LGAs. TRRA strengthens the capacity of leaders and community members to negotiate and set regional priorities (DPE, 2022a). Other key organisations in the Dubbo Regional LGA include the Dubbo Aboriginal Community Working Party and the Dubbo Local Aboriginal Land Council (LALC).

2.3. Services and facilities

There are no services or accommodation in Minore. The city of Dubbo is a major service centre for surrounding localities and towns and for much of western NSW, servicing a catchment of more than 120,000 people. It provides an extensive range of health, educational, government, professional, and retail services and is well-served by road, rail and air transport (DPE, 2022a).

Key services and facilities include:

- **Health services:** Dubbo Base Hospital and Lourdes Hospital; associated allied and specialist health services; Dubbo Community Health Centre; Dubbo Aboriginal Medical Service.
- **Educational facilities:** Charles Sturt University, University of Sydney School of Rural Health, TAFE Western Dubbo College, Western College, secondary and primary schools.
- **Transport infrastructure:** Dubbo City Regional Airport, future Inland Rail freight line, rail line from Sydney, coach services.
- **Employment services:** a range of services, including Regional Enterprise Development Institute, VERTO Dubbo, Industry Skills Solutions, Skillset, Spinifex Recruiting, Sureway Dubbo, Joblink Plus and Job Centre Australia.
- **Housing services:** Home in Place, St Vincent de Paul Housing, Orana Support Service, Housing Plus.
- **Cultural and Entertainment facilities:** Dubbo Wiradjuri Tourism Centre, Dubbo Regional Theatre and Convention Centre, two theatres, three galleries, a museum, Taronga Western Plains Zoo, Dubbo Observatory

Narromine also provides a more limited range of services, including a small public hospital and community health services, early childhood services, public and private primary and high schools, a library, short-term accommodation options, retail services and sporting and recreational facilities. Gilgandra similarly offers a

range of retail, educational, community and health services, including a multipurpose health service, medical centre, community care centre, and sporting facilities. Short-term accommodation options include several motels and three caravan parks.

2.4. Regional economy

The Dubbo Regional LGA has historically specialised in agriculture, mining, tourism, manufacturing, and freight. Over time, the region's economy has shifted to include health, education, and service sectors. The region's largest employer is the healthcare and social assistance industry, with 5,391 jobs representing 20% of total employment. Other key industries of employment include construction (10%), retail trade (10%), and education and training (10%) (REMPPLAN, 2024).

In 2021, of the 61% of people aged 15 years and over who were in the labour force, 62% worked full-time, 28% worked part-time, and 4% were unemployed (ABS, 2021). The unemployment rate in the Dubbo Regional LGA rose to a peak of 4.4% in the quarter to September 2021 during the Covid-19 pandemic but has averaged 3.4% over the four quarters to March 2023, indicating tight labour market conditions (Jobs and Skills Australia, 2024). Around 4% of employed Dubbo Regional residents work outside the LGA (REMPPLAN, 2024).

The construction industry is the largest contributor to economic output (17%), followed by manufacturing (12%) and health care and social assistance (10%). As of June 2022, there were 5,492 businesses operating in the Dubbo Region. The largest number of registered businesses are in the 'Agriculture, Forestry & Fishing' sector (1,202), followed by 'Construction' (1,049) (Dubbo Regional Council, 2023b). The Dubbo Region is well positioned as a growing mining services centre, with mining and exploration projects established and emerging across the surrounding region, including the Critical Minerals Hub.

Tourism is also a significant local industry (Dubbo Regional Council, 2023a). The most visited sites include the Taronga Western Plains Zoo, Wellington Caves, Lake Burrendong, Macquarie River, and Mount Arthur Reserve. The area is recognised for its cultural heritage, including the Old Dubbo Gaol and National Trust Dundullimal Homestead, and Aboriginal heritage, including art at the Western Plains Cultural Centre and tours at First Lesson Cultural Tours.

2.5. Regional opportunities and challenges

The Central West and Orana Regional Plan 2041 (DPE, 2022a) seeks to leverage the region's rich natural endowments and the opportunities presented by major investments in the Inland Rail, Parkes Special Activation Precinct, and the Central-West Orana Renewable Energy Zone (CWO REZ) to develop its industries and diversify its economy and support enhanced resilience across the community. A key objective of the Regional Plan is to support the State's transition to Net Zero by 2050 and deliver the CWO REZ.

The CWO REZ and the emerging critical minerals sector are centred on the Dubbo Regional LGA, which is now home to several large-scale renewable energy projects and upcoming extractive industries and is seeing greater integration and development of smart technology and supporting infrastructure (DPE, 2022a). DRC is well placed to capitalise on opportunities related to regional economic diversification, with an established agricultural base, specialised value-added manufacturing capability, freight and logistics infrastructure, local labour force and education capacity.

The Dubbo Regional LGA is experiencing the initial stages of a significant increase in growth and investment associated with a range of large infrastructure and other projects, including:

- Development of the CWO REZ, including a particular uptake in renewable energy activity around Wellington and Elong Elong within the Dubbo Regional LGA.
- The Australian Strategic Minerals (ASM) Toongi rare earth mine and storage processing facility and the wider Critical Minerals Hub.

- Major construction projects, including the Inland Rail and New Dubbo Bridge (Newell Highway) and Inland Rail.
- The ongoing growth and development of major employers in the Dubbo Region, including (but not limited to) NSW Health, Charles Sturt University, and Fletchers International Exports.
- The ongoing impact on Dubbo of the growth and development of the Parkes Special Activation Precinct.

The Narromine Shire LGA will also experience growth and development associated with the Inland Rail. The Council's priorities include industrial and commercial opportunities from the Aviation Business Park, soon-to-be-constructed industrial hub and industrial estate on the Mitchell Highway (DPE, 2022a). The Dubbo Regional and Narromine Shire LGAs comprise the Central Orana Region.

Since 2018, the Central Orana Region has seen significant investment delivered and recorded significant population growth, which has brought opportunities and challenges. The updated Regional Economic Development Strategy (REDS) (Department of Regional NSW, 2023) highlighted housing supply, sustainable economic development considering major project investment, and enhancing liveability as key priorities:

- Concerns that current housing availability challenges, i.e., shortages of housing stock in the region, will worsen in the face of a growing population and a need to house a significant number of workers associated with major project delivery in the region.
- While recognising the significant economic opportunities provided by investments in major infrastructure and precinct-based developments, the region must focus on ensuring long-term benefits are delivered to communities to ensure major projects do not lead to a boom-bust sequence of events.
- The importance of ongoing investment into social and community infrastructure and key population serving services (such as education and health). Enhancing liveability to improve amenity for existing residents and supporting efforts to attract and retain skilled workers represent key priorities in the region.

2.5.1. Workforce capacity

The Central West and Orana's local economy has a strong agrarian history, with mining, food processing, and service provision growing in their share of employment. Planned solar and wind energy projects in the region will increase demand for appropriately skilled workers such as wind turbine technicians, system designers and installation technicians. While the region currently has a sizeable talent pool of technicians and tradespeople, education and training are likely to become a central focus, given known skills shortages and a need to reskill or upskill the existing workforce to engage in specific renewable energy activities (Office of Energy and Climate Change, 2022).

Regional Development Australia (RDA) Orana's Strategic Regional Plan (2023-2026) identifies education and training as a growth sector for the region with increasing trainee and apprenticeship roles. However, these are constrained by a lack of opportunities for local face-to-face training and the need for regional training for technical skills such as engineering, mineralogy, and geology to support mining, energy, manufacturing, and construction industries (Regional Development Australia, 2023).

2.5.2. Housing and accommodation

Ensuring adequate accommodation for residents, workers, and the tourism industry is a priority for councils in the Central Orana Region and the broader CWO REZ. According to the REDS report, the stakeholders raised concerns about housing availability constraining the growth capacity of local businesses, as attracting and retaining workers is contingent upon the availability of worker housing (Department of Regional NSW, 2023). This issue will likely be compounded as more workers are drawn to the region to support major project deliveries in the pipeline in the coming years.

There are significant accommodation and housing supply constraints in the CWO REZ. There is a limited supply of medium-density housing in the region, a shortage of short-term housing stock and an outpaced demand for short-term accommodation versus supply. Strong housing demand in the REZ, particularly in DRC and Mid-Western Regional Council LGAs and forecast population growth indicate a need for increased permanent housing in these areas. Consistent with many regional areas in NSW, house prices and rents have increased relative to household income in the region, leading to a general decrease in mortgage and rental affordability (Delos Delta, 2023).

Since 2016, there has been a rapid growth in short-term rental accommodation in the region (DPE, 2022a), catering primarily to tourists and providing accommodation for seasonal or temporary workers. The demand for and supply of temporary worker accommodation positively and negatively impacts local housing markets and tourism accommodation. However, according to the Central West and Orana Region Plan 2041, the development of short-term worker accommodation can provide legacy infrastructure or be adapted into alternative uses such as tourism accommodation or low-cost housing for vulnerable people, as demand for accommodation fluctuates (DPE, 2022a). This may also provide opportunities for the growth of towns in the medium to long term and reduce pressure on social and affordable housing provision.

During the “Ordinary Council Meeting” held on 23 March 2023, the Development and Environment division of the DRC recommended to *“Create, and support over the medium term, a ‘Housing Coordinator’ role in Council. Develop a job description, resourcing plan, and run a recruitment process”* (Dubbo Regional Council, 2023c, p. 7). Further, the meeting recommended for the *“Development of a short-term worker camp to be eventually re-purposed for tourism”* (p.8) and to investigate the feasibility of *“Build-to-rent options for Council owned land”* (p.9). Additionally, DRC, in partnership with Delos Delta undertook an analysis of short-term worker accommodation needs (Delos Delta, 2023) to understand the dynamics of short-term worker accommodation in the region with the intention to (p.4):

- Analyse short-term accommodation needs in the LGA;
- Understand industry stakeholders’ accommodation needs and insights;
- Provide a suite of recommendations regarding short-term accommodation in Dubbo and Wellington;
- Consider the wider need for accommodation models from an investment attraction perspective.

The report defines short-term accommodation requirements between 3 and 12 months. One of the accommodations of the analysis report was to develop a housing strategy for Dubbo and Wellington, led by the Housing Coordinator (p.27). Despite strong regional networks of local manufacturers and suppliers and enough technical capability to deliver workforce housing options, the scale of the incoming workforce is a key challenge for government, industry and business to address.

3. Workforce overview

It is anticipated that approximately 300-350 construction personnel will be required onsite during the peak construction period of approximately 10 months. Overall, the construction period could stretch between 12-18 months of commencing.

As per Schedule 2 Condition B14 and unless the Planning Secretary agrees otherwise, the Applicant may only undertake road upgrades, construction, upgrading or decommissioning activities between:

- 7.00 am - 6.00 pm Monday to Friday
- 8.00 am - 1.00 pm on Saturdays
- At no time on Sundays or NSW Public Holidays.

3.1. Workforce estimates

3.1.1. Construction

The main construction activities may include:

- Site establishment and preparation for construction: ground preparation, construction of the internal track system, upgrade of existing access points/intersections, preliminary civil works and drainage
- Installation of permanent O&M site office with staff amenities and vehicle parking
- Installation of steel post and framing system for the solar panels
- Installation of underground cabling (trenching) and installation of inverter stations
- Installation of PV panels
- Construction of operation and maintenance building and switch room
- Construction of the substation and connections
- Installation of BESS
- Removal of temporary construction facilities and rehabilitation of disturbed areas.

Thus, considering the construction activities, some of the key jobs during construction will include operators, project managers, mechanical management, labourers, installation experts, and technicians. Construction employment numbers are anticipated to peak in mid-2025, with up to 350 personnel required on-site, and then progressively decline to 20 in December 2025 (Figure 3-1).

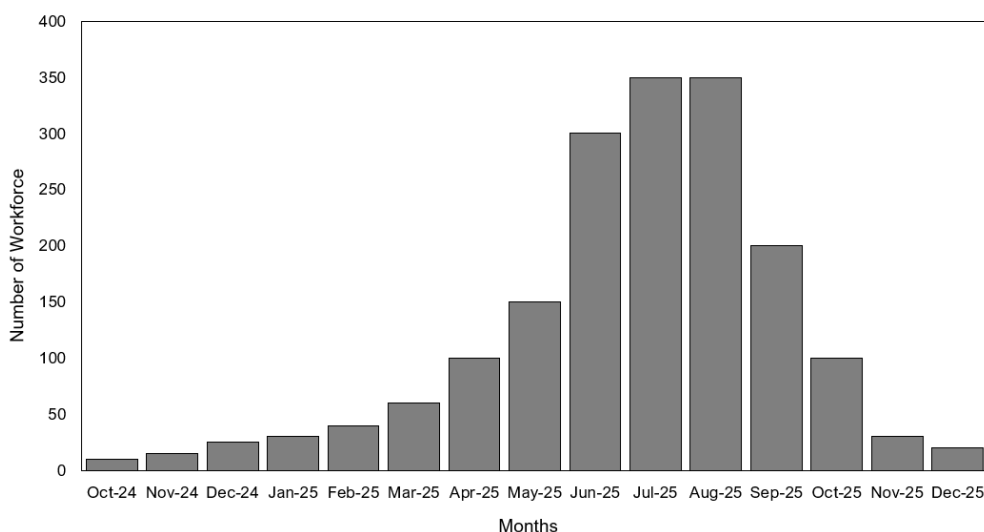


Figure 3-1: Workforce requirements during the construction phase

3.1.2. Operation

The solar farm is expected to remain operational for 35 years and will be monitored and operated by approximately 7 to 10 full-time equivalents (FTE). Some of the activities during the operational phase includes:

- Routine visual inspections, general maintenance and cleaning operations of the solar arrays as required
- Routine visual inspections, general maintenance and cleaning operations of the substation
- Vegetation management
- Site security response (24 hr) if required
- Site operational response (24 hr) if required
- Replacement of equipment and infrastructure as required
- Maintenance of landscaping and screening plantings as required
- Pest plant and animal control as required.

3.1.3. Decommissioning

The solar farm will be decommissioned at the end of its operational life. An effort will be made to reclaim the land back to its original state, and all materials will be recycled or re-used where possible. Some of the key elements of decommissioning will include:

- The solar arrays, including the foundation posts, will be removed. Materials will be sorted and packaged for removal from the site for recycling or reuse wherever possible
- All infrastructure would be removed apart from the substation and materials recycled or reused wherever possible
- Posts and cabling will be removed and recycled
- Fencing will be removed, including small concrete footings
- Gravel pavement materials will be recovered and recycled as general fill in an appropriate location
- Areas subject to compaction will have the topsoil ripped to a depth suitable for seeding if appropriate
- Sodic soil will be treated as necessary with lime or gypsum.

3.1.4. Indirect employment

Aside from the direct employment opportunities outlined above, the employment benefits are anticipated to extend through local supply chains to include accommodation providers, catering and cleaning companies, fuel supply, tradespersons, tool and equipment suppliers, uniform suppliers, vehicle servicing and many other businesses.

3.2. Interaction with other projects

Development Consent condition B29(b) requires the consideration of the cumulative impacts associated with other State Significant Development projects in the area. Cumulative impacts may occur if construction periods for nearby major projects overlap with the current Project's construction period. This is particularly challenging when managing access to short-term accommodation and other services within the community, as well as managing local employment and service procurement. However, overlapping or coordinated project timelines create opportunities to build a pipeline of projects that encourage resident skilled workers to stay in the area and encourage others to move to the area, either in the medium term or permanently, to work across consecutive projects. This is an opportunity for the Council to capture on retaining skilled people by investing some time to plan the schedule of projects coming to the region.

As noted in section 2.5, the Central West Orana region is experiencing an increase in economic activity driven by a pipeline of infrastructure projects, notably the CWO REZ transmission project and the Inland Rail. Several major projects have been identified as being in proximity to the Project and, therefore, of relevance from an employment and accommodation availability perspective. The projected workforce numbers between 2023 and 2028 during construction of the CWO REZ transmission project and major generation projects with planned connections to the REZ network alone are estimated to exceed 4,000 between mid-2025 and mid-2026, with a peak of about 5,000 in late 2025 (EnergyCo, 2023).

Several renewable energy projects clustered around the Wellington area (Table 3-1) are highly likely to demand workers, accommodation, and services concurrently. Several other projects in or near Wellington are still in the planning stage that have not been included in Table 3-1, which may overlap with the later stages of construction with this Project. Some of the projects are Orana BESS – Response to Submissions; Wellington South BESS – Assessment; Wellington Town BESS – Prepare EIS; Suntop Solar Farm (operational) – Prepare Mod 2 for BESS; Burrendong Wind Farm – Prepare EIS.

The action plan and mitigation strategies outlines in Section 5.2. are designed to mitigate the potential social impacts of the Project, including the cumulative impacts of other state significant developments. The Accommodation Strategy Action Plan contains implementation measures and compliance records that address potential impacts that are commonly exacerbated by the cumulative impacts of major infrastructure projects. These include the impacts on traffic and road safety, increased pressure on accommodation, pressure on social infrastructure and workforce competition.

The emphasis on local employment and local procurement developed in the strategy are designed to offset any major disruptions to the host communities for the Project. The priority to employ businesses and subcontractors registered in the Council or Narromine Shire LGAs will reduce the need for out-of-town workforce which will also require housing throughout the construction phase. The strategies developed to achieve these outcomes are addressed throughout this AES. Furthermore, the

The action plan and mitigation strategies include implementation actions which are designed to ameliorate pressures on traffic including from cumulative project impacts.

Accommodation and Employment Strategy

Forest Glen Solar Farm



Table 3-1 Potential concurrent demand

Name	Location	Status (Sept 2024)	Development timeline (indicative only)	Potential concurrent demand
Renewable energy projects				
Wellington North Solar Farm 300MW AC / 425MW DC	~50km southeast of Dubbo ~7km northeast of Wellington	Approval April 2021	Under construction, anticipated completion Q2 2024	Unlikely
Maryvale Solar Farm 125MW BESS 125MW / 375MWh	~37km southeast of Dubbo ~15km northwest of Wellington	Approval December 2019 Mod 1 – BESS - Approval July 2022 Mod 2 – Increase capacity to 230MW AC - Assessment	Construction 12-18 months commencing late 2024	Possible ~400 FTE construction ~10 FTE operation Peak worker demand – Q1 2025
Uungula Wind Farm 414MW	~14km east of Wellington	Approval May 2021	Under construction, early works commenced Q3 2023	Unlikely ~270 FTE construction ~12 FTE operation Peak worker demand – Q1 and Q2 2024
Apsley BESS 120MW / 240MWh	~6km south of Apsley township ~55km south of Dubbo ~10km south of Wellington	Approval June 2023	Construction 5-8 months Q1 2024.	Unlikely ~50 FTE construction ~3-5 FTE operation Peak worker demand – Q2 2024
CWO REZ Transmission Project	Multiple LGAs, including Dubbo Regional	State Planning Approval June 2024 Commonwealth Planning Approval August 2024	Construction 4 years 2024-2028 commencing Q4 2024	Likely ~1800 FTE construction [~10% local employment] Peak worker demand – Q4 2025 after that Q2 to Q4 2026 [>1000 FTE]
Wallaby Creek Wind Farm 250MW BESS 100MW / 200MWh	~10km south of Narromine ~15km north of Tomingley	Prepare EIS	Construction up to 24 months Commencing 2027	Unlikely ~150 FTE construction ~6 FTE operation Peak worker demand – Q2 and Q3 2027

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Name	Location	Status (Sept 2024)	Development timeline (indicative only)	Potential concurrent demand
Narromine BESS 125MW / 250MWh	~3.5km southeast of Narromine	Prepare EIS	Construction 9 months; timeline unknown	Unknown ~40 FTE construction ~2 FTE operation
Burroway Solar Farm 100MW	~17km north of Narromine ~27km west of Dubbo	Prepare EIS	Construction 12-18 months; timeline unknown	Possible ~250 FTE construction peak ~4 FTE operation
Spicers Creek Wind Farm 700MW	~40km east of Dubbo ~25km northeast of Wellington	Recommendation	Construction 40 months commencing 2025	Possible ~587 FTE (323 FTE peak) construction ~12 FTE operation Peak worker demand – Q4 2025 and Q1 2026
Dapper Solar Farm 250-300MW	~60km east of Dubbo	Prepare EIS	Construction 18-24 months commencing 2025	Possible ~350 FTE construction ~15-20 FTE operation Peak worker demand - Unknown
Gilgandra Solar Farm 50MW	~23km south of Gilgandra ~36 north of Dubbo	Approval July 2017 Mod 1 – Increase height – Approval June 2019 Mod 2 – Approval September 2019	Project is currently on hold (pending transmission network upgrades) Construction 9-12 months	Unknown ~110 FTE construction
Other SSD & infrastructure projects				
New Dubbo Bridge	~16km east of Dubbo	N/A	Under construction, anticipated completion Q4 2026	Likely ~200 FTE construction
Dubbo Firming Power Station 64MW (dual fuel) 20MW hydrogen	~17km east of Dubbo	Approval May 2024	Construction 18 months commencing mid-2025	Likely ~150 FTE construction ~6 FTE operation Peak worker demand – Q3 and Q4 2025

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Name	Location	Status (Sept 2024)	Development timeline (indicative only)	Potential concurrent demand
Inland Rail – Narromine to Narrabri	Multiple LGAs including Narromine Shire, Gilgandra Shire	Approval February 2023	Construction 4 years 2024-2028	Likely ~1500 FTE construction (Narromine- Gilgandra construction area)
Dubbo Project (formerly Dubbo Zirconia Mine)	~25km south of Dubbo ~33km northwest of Wellington	Approval Mod 1 – Project layout and processing changes – Approval March 2023	Construction 2-3 years; timeline unknown	Likely ~1,000 FTE construction (peak) ~625 FTE construction (average) ~274 FTE operation Peak worker demand – Unknown

In addition, projects clustered around Elong Elong on the eastern edge of the Dubbo Regional LGA include Sandy Creek Solar Farm (prepare EIS) and Cobbora Solar Farm (prepare EIS). Additionally, several smaller utility-scale solar farm projects exist in the Central Orana Region that are seeking or have received Council development approval and may increase concurrent demand for workers and accommodation. Some smaller-scale projects include Wellington Road Solar Farm & Sheraton Road Solar Farm (Dubbo), 5MW Geurie Solar Farm, and 5MW Wahroonga Solar Farm (near Narrabri).

Other major infrastructure projects in the broader region that could potentially contribute to concurrent demand for accommodation and human resource requirements include the New Dubbo Bridge and Inland Rail – Narromine to Narrabri. To accommodate workers, Inland Rail has plans to build five accommodation facilities with capacity to accommodate 500 people in each facility (DPE, 2023). This could mean that their accommodation facility could accommodate all their workers, as the project is expected to generate employment of approximately 2,000 workers during its peak construction.

However, several existing mines and quarries are currently in operation within the surrounding areas, which could have a cumulative impact on accommodation and employment in the region. At least four of those mines and quarries are seeking to expand and potentially assessable as SSDs:

- Dubbo Project (formerly known as the Dubbo Zirconia Mine), located at Toongi, south of Dubbo. Approval was granted in 2015, and Modification 1 – Project layout and processing changes were approved in March 2023. It is anticipated that up to 1000 FTE positions will be created at the peak of the two-three year construction and site establishment phase, with 274 FTE staff during operations.
- Dubbo Quarry Continuation Project, involving an expansion of an existing hard rock quarry into two new resource areas to the south and west of the existing quarry. Approval was granted in March 2023. The quarry will utilise the existing workforce of 12 FTE staff and 63 contractors.
- South Keswick Quarry is seeking to increase the production of an existing hard rock quarry from 495,000 tonnes per annum (tpa) to 750,000 tpa. There are currently between 12 and 24 FTE staff; this is expected to increase to between 24 and 36 FTE staff (prepare EIS).
- Tomingley Gold Extension Project, approved in March 2023, will increase the mine's capacity and extend the mine life from 2025 to 2032. It currently employs around 230 FTE personnel, with around 45% residing in Dubbo and 15% in Narromine, and this will increase to up to 363 FTE personnel.

3.2.1. Potential concurrent demand for workers

Based on the Project status and development timeline reflected in **Table 3-1**, four projects, Maryvale Solar Farm, Burroway Solar Farm, Spicers Creek Wind Farm, and Dapper Solar Farm, could potentially lead to concurrent worker demand. However, it is likely that five other projects, CWO REZ Transmission Project, New Dubbo Bridge, Dubbo Firming Power Station, Inland Rail and Dubbo Project, could impact the worker demand in the region (**Table 3-2**).

It is highly likely that projects deemed 'possible' and 'likely' contribute to the cumulative impacts regarding accommodation and employment. However, the total number of workers required simultaneously reflected in **Table 3-2** only considers the scenario where the peak workers requirement for all projects happens concurrently, which is subject to the approval processes.

Table 3-2: Potential concurrent workers' demand

Name	Peak FTE	Tentative Peak Demand	Name	Peak FTE	Tentative Peak Demand
Possible			Likely		
Maryvale Solar Farm	400	Q1, 2025	CWO REZ Transmission Project	1800	Q4, 2025 to Q1-Q4, 2026
Burroway Solar Farm	250	Unknown	New Dubbo Bridge	200	Under construction
Spicers Creek Wind Farm	587	Q4, 2025 to Q1, 2026	Dubbo Firming Power Station	150	Q3-Q4, 2025
Dapper Solar Farm	350	Unknown	Inland Rail	1500	2024-2028
			Dubbo Project	1000	2025-2028
Total Worker	1587			4650	

Irrespective of having the peak worker demand almost at the same time for all the projects listed in **Table 3-2**, the existence of several projects in the region which are currently in the construction stage, planning or approval stage, it is expected that the region could be exposed to accommodation and employment pressure.

Additionally, mines and quarries are currently operating in the surrounding areas, which employ workers who require accommodation.

4. Accommodation strategy

4.1. Scope

The safeguards and mitigation measures section of the Project's EIS mentions the following strategies that are relevant for this AES:

- SE2: Liaison with local representatives regarding accommodation options for staff to minimise adverse impacts on local services
- SE3: Liaison with local tourism industry representatives to manage potential timing conflicts with local events
- C1: The proponent would liaise with representatives of Maryvale, Dunedoo, Wollar, Mumbil, Suntop and Gilgandra, Burrendong and Ungula wind/ solar farm developments to manage impacts on local services, accommodation, and businesses
- C2: Accommodation and Employment Strategy for the development in consultation with Council.

In relation to C1 above, it is noted that Mumbil Solar Farm has not proceeded, and Dunedoo Solar Farm was granted approval in 2021 and is yet to commence construction after requesting staging of strategies and plans in March 2023. However, due to its location, it is no longer considered relevant to this Project. Similarly, Wollar Solar Farm received approval in 2020, and construction began in February 2023. However, considering the distance from this Project (150km southeast), the potential cumulative impacts identified in the EIS are not relevant as it was related to the haulage route rather than pressure on accommodation or services.

4.2. Review of options

A review of the accommodation options was conducted by Santé Group. They conducted an extensive examination of the local accommodation market and reached out to local real estate agents, Airbnb operators, and hotels/motels in the Dubbo area.

As of February 2025, current availability is as follows: over 106 houses/units are available for real estate rentals, more than 62 properties are available for long- and short-term leases on Airbnb, and most hotels/motels offer long-term accommodation.

Given that no major projects are operating concurrently and the completion of the Wellington 400MW Solar Farm, along with the local engagement target program, Santé believes sufficient accommodation is available to complete the project.

4.2.1. Workers' temporary accommodation

This category includes on-site or off-site accommodation utilising temporary accommodation. Although this has not been commonly used in Dubbo and surrounding areas, it is being considered for several projects in the CWO REZ. As mentioned in section 3.2, worker accommodation facilities are being developed for the Inland Rail Narramine to Narrabri.

However, considering the cumulative impacts of several SSDs coming to the LGA, the *Ordinary Council Meeting* of 23 March 2023 recommended to “review underutilised commercial and Council buildings and their viability for residential, public housing, and short-term accommodations options” (Dubbo Regional Council, 2023c, p. 8). The meeting also acknowledged the existence of a range of commercial and other buildings, not necessarily in Council ownership, that may temporarily be used for short-term workers' accommodation.

Thus, considering the cumulative impacts, the Project may need to consider temporary accommodation in consultation with the Council.

4.2.2. Short-term accommodation

According to the *Analysis of Short-term Worker Accommodation Needs* published by the DRC (Delos Delta, 2023), current short-term accommodation options in Dubbo primarily consist of accommodation facilities, such as motels, hotels, motor inns, and cabins across the region. As of March 2022, there were 55 such facilities across the LGA, offering 1526 rooms and a capacity of 5684 occupants. The report notes that, on average, 381 rooms remain available per night throughout the year.

Additionally, in July 2024, there were approximately 207 Airbnb listings within the Dubbo Regional LGA, concentrated in and close to Dubbo (airbnb, 2024a). Options include homes, apartments, cabins, farm stays and rooms, with some available for monthly rental. There were approximately 15 Airbnb listings within the Narromine Shire LGA (airbnb, 2024b).

4.2.3. Rental or purchased accommodation

The Central West Orana region has experienced housing availability challenges since 2018, with the market continuing to tighten significantly. There are high rates of home ownership in the smaller towns in proximity to the Project, with separate houses as the predominant dwelling type. Accordingly, there is a shortfall of long-term local rental accommodation, with only a handful of rental properties available in any given month, and most of these are 3–4-bedroom houses.

While Dubbo offers a wider variety of dwellings and a larger rental market, vacancy rates have generally been below 2.5% since January 2018 and fell below 1% between July 2020 and October 2022. Although the vacancy rate has slightly increased to an average of around 1.3% since November 2022, the vacancy rate as of June was 1.1% (SQM Research, 2024). The number of rental properties and the corresponding vacancy rate in June 2024 are presented in Table 4-1.

There has also been upward pressure on rents over the past several years. The median weekly rent in Dubbo (postcode 2830) for the June 2023 quarter was \$430, representing an annual increase of around 5%. The median weekly rent was slightly lower across the Dubbo Regional LGA (\$420, an annual increase of 8%). Rents have also been increasing in Narromine (postcode 2821), with a median weekly rent of \$390 in June 2023, an annual increase of over 11% (DCJ, 2023).

Table 4-1 Rental vacancy numbers and rates, August 2023

Location	Postcode	Number of rental vacancies	Rental vacancy rate
Dubbo (includes Minore)	2830	67	1.1%
Narromine	2821	7	1.9%
Geurie	2818	n/a	n/a
Wellington	2820	49	6.5%
Tomingley/Peak Hill	2869	0	0.0%
Gilgandra	2827	3	0.8%

(Source: SQM Research – Residential vacancy rates; DCJ – Rent & sales, June Quarter 2023)

Housing affordability in the Central Orana region has declined over the past several years. According to the suburb profile report of Dubbo, Between June 2018 and June 2023, the median house price in the Dubbo

LGA increased. In June 2018, the median value of houses for sale was \$320,000 and then steadily increased, reaching over \$640,000 in June 2021 and declining to over \$500,000 in June 2023 (Latham, 2023). This trend is consistent with the price for units that were listed on sale in the Dubbo and Narromine LGA markets (NSW Communities and Justice, 2024).

With respect to houses for sale and their associated costs as of 17 July 2024 listed on Domain (Domain, 2024):

- There are approximately 217 properties for sale in Dubbo (postcode 2830, excluding nearby suburbs). The majority are 4-bedroom houses (80) and 3-bedroom houses (47), with median prices of \$648K and \$495K, respectively. Two 2-bedroom units are for sale, with a median price of \$445K.
- There were 71 properties for sale in Narromine (postcode 2821). There were ten 3-bedroom houses with a median price of \$379K.

4.3. Accommodation strategy action plan

The Forest Glen Solar Farm’s accommodation strategy action plan is presented in **Table 5-1**, which identifies proposed actions to accommodate workers during the Project cycle. It is assumed that other SSDs in the area that are either approved or proposed (see **Table 3-1**) could impact the availability of short-term or rental accommodation. Assessing potential cumulative impacts will form part of the regular monitoring for this Strategy.

One strategy that the Proponent will adopt is to recruit workers through Hynes Recruitment, which has almost 75% of blue and white-collar workers registered from the local region. Hynes Recruitment has skilled construction managers, electrical supervisors, quality managers, and HV and LV electricians (**Table 4-2**). This could mean that, in addition to the workers, some skilled workers can also be locally sourced, which could minimise the pressure on local temporary accommodation. Additionally, the Proponent recorded the availability of adequate labourers and skilled workers in Wellington, which is approximately a 50-minute drive from the Project location.

Further, Labour Solutions, a Dubbo Labour Hire: Construction Labour Hire Specialists, confirmed that all their available labourers are from the local region, and 50% of them are Indigenous. Considering the provision of local employment, the Project intends to involve local recruitment agencies that have locally registered workers in the development of the Project.

Table 4-2: Recruitment agencies in the Dubbo region with available workforce

Recruitment Agencies	Category of workers	Number of workers	Remarks
Hynes Recruitment	HV and LV Electricians	20	About 75% of the available workers are from the local area.
	Labourers	60	
	Skilled workers (non-electrician)	15	

Recruitment Agencies	Category of workers	Number of workers	Remarks
Skillset	Labourers	10	Provides apprenticeship program and minimal local resources.
Labour Solutions	Labourers	80	Available from local regions with 50% Indigenous.
	Skilled workers	10	
Michell Machinery Hire	Operator	10	Excavators, Dozers, Loaders, Dump trucks

While employment will be sourced locally as much as possible, the Project would still need accommodation for approximately twenty-five managers and supervisors that will be associated with the Project. The Proponent's EPC contractor has secured within Dubbo region on a rolling month to month basis the following:

- 6 rental properties (EPC white collar use)
- 8 rental properties (mechanical sub-contractor)
- 4 rental properties (civil sub-contractor)

Additionally, if required, Dubbo also has several long-term accommodation options. For instance, DBO Apartments has 14 properties. Other long-term accommodation options include Country Apartments, Cattleman Country Inn, Eastend Studio Apartments, Western Plains Tourist Park Cabins, Dubbo Midstate Tourist Park Cabins and other available apartments for rent.

Though the Project intends to generate local employment through local recruitment agencies, it is possible that there is not enough workforce available, considering several projects operating simultaneously. This could mean recruiting workers outside the region, leading to an influx of people. If this situation arises, the Proponent could explore the possibility of developing Centurian Accommodation and Modular Camps into the Project's accommodation, which could accommodate about 100 workers.

5. Employment Strategy

5.1. Scope

X-Elio's sustainability report states that *"The company is committed to making a positive impact on the lives of its employees and society. To achieve this objective, they provide their staff with training opportunities such as workshops and courses. They are also strongly committed to promoting a healthy work-life balance, with flexible scheduling policies in place"* (X-ELIO, 2022, p. 49). Both the sustainability policy (X-ELIO, n.d) and the sustainability report of the Proponent is consistent with the EIS. For example, the EIS of the Project states that *"local employment would be maximised by consulting with local employment and training organisations, and potentially supporting training and apprenticeships relevant to the proposal"* (NGH & X-ELIO, 2021, p. 178).

Relevant safeguard and mitigation measures from the EIS (NGH & X-ELIO, 2021, p. 180):

- SE1: Liaison with local industry representatives to maximise the use of local contractors, manufacturing facilities, and materials
- SE3: Liaison with local tourism industry representatives to manage potential timing conflicts with local events
- SE5: The Proponent will consult with local employment agencies and training organisations and, where practicable, will consider supporting training and apprenticeships.

According to the Project's EIS report, the Forest Glen SF would generate approximately 150 jobs during construction, with up to 350 workers employed during peak construction, which is approximately 10 months. The EIS targets to employ approximately between 20% and 50% of local residents of the total workforce (NGH & X-ELIO, 2021). However, the SIA of the Spicers Creek Windfarm (currently in assessment status), which is located in Dubbo Regional LGA, highlight a suggestion by the DRC that only *"10% local employment could be achieved by the renewable energy project"* (umwelt, 2023, p. 56). This suggests limited workforce availability in the LGA, potentially requiring sourcing the remaining workers outside the region.

However, a strategy outlined in this document is to employ businesses and subcontractors registered in the Council or Narromine Shire LGAs. These businesses and subcontractors would have already employed local people, contributing to local employment generation and minimising the accommodation pressure.

5.2. Employment targets

5.2.1. First Nations Participation

The Central Orana Regional Economic Development Strategy published by the Department of Regional NSW (2023) reports that the Aboriginal unemployment rate in the Central Orana region has significantly improved over the past decade. The strategy highlighted that Aboriginal unemployment decreased from 19.8% in 2011 to 17.2% in 2016 and 9.5% in 2021. However, the strategy acknowledged that though this rate is slightly lower than the Aboriginal unemployment rate for all of NSW of 9.8% it remains above the NSW unemployment rate of 4.9%.

An ongoing collaborative approach between stakeholders, including Aboriginal community representatives, local government, business, and industry, is needed to ensure that increasing Aboriginal economic participation continues to be a key economic development priority across the region. The Proponent will work with local First Nations stakeholders to identify and maximise employment, training and procurement opportunities. Dubbo City Council acknowledge the Dubbo Aboriginal Community Working Party as the representative body for the Dubbo Aboriginal Community (NSW Government, n.d.). The Party may have the

ability to identify local workers for the Project with the appropriate skills if given sufficient information and time.

The Proponent will require their EPC and O&M contractors to engage First Nations businesses and facilitate contact between First Nations Groups and contractors to provide pathways to job opportunities and skills development among First Nations people. Information about available positions and required skills will be provided to local First Nations Groups. The Proponent will assess their current procurement and employment practices to identify areas to improve the engagement of First Nations peoples, particularly in terms of inclusivity and the recruitment of First Nations businesses and individuals. Feedback from First Nations communities, employees, and stakeholders will be used to identify areas for improvement and necessary adjustments.

As a starting point, the Proponents should design and implement an Aboriginal Participation Plan (APP) following the Aboriginal Participation and Outcome Plan Template (NSW Government, 2022). The Proponent could use local training and employment support agencies and providers to match local Aboriginal job seekers to new positions to meet the participation plan commitments. Further, the Proponent could consider joint ventures or partnership opportunities through adjustments to work packages to support Aboriginal participation while building skills, capability and capacity

This Employment Strategy acknowledges the significant challenges relating to workforce procurement due to the cumulative demand for labour from large infrastructure projects. Whilst there are opportunities to prioritise the hire of workers from the local region (including the Dubbo and Narromine LGAs), it is estimated that a significant proportion of the workforce may be sourced from outside the region and interstate. However, if the businesses and sub-contractors who are registered in the Council are employed, a local employment target identified in the Project's EIS is achievable.

5.3. Action plan and mitigation strategies

Prior to construction, the Proponent will work with the EPC contractor to implement the employment components of this strategy. Further, the AES will undergo revision by seeking feedback and consulting with stakeholders to ensure the strategy remains relevant. This will include developing mutually beneficial relationships with First Nations organisations, networks, and businesses to identify joint initiatives supporting positive socioeconomic outcomes. The roles and responsibilities of relevant parties to successfully deliver this action plan are presented in Table 5-2.

The Forest Glen Solar Farm AES action plan (Table 5-1) presents proposed actions to engage, retain and accommodate workers during the Project cycle. It is assumed that the other State Significant Renewable Energy projects in the area that are either approved or proposed, as reflected in Table 3-1, would have an impact on the availability of workers and short-term and/or rental accommodation. Assessing potential cumulative impacts will form part of the regular monitoring for this Strategy.

Accommodation and Employment Strategy

Forest Glen Solar Farm



Table 5-1: Accommodation Strategy Action Plan

Measures	Responsible Party	Objective	Timing	Implementation Action	Compliance Record
Prepare & implement an AES that is consistent with DRC's requirements and impacts identified by SIA.	Project Manager Site Manager EPC Project Manager	Prioritise local content & opportunities for local businesses, services, & workers.	Prior to construction, ongoing	This AES	This AES
Implement an AES in accordance with Schedule 2, Condition B29 of the Development Consent	Project Manager EPC Project Manager Supervisor/Coordinator All employees and contractors	To remain consistent with the Development Consent of the Project	Prior to construction, ongoing	This AES	This AES
Embed transparent selection criteria for subcontractors prioritising organisations based in the Dubbo and Narromine (Tier 1), as well as the broader Dubbo, Narromine, and Gilgandra LGAs (Tier 2) LGA. Prioritise and select subcontractors that can demonstrate a high proportion of the workforce living in Tier 1 and Tier 2.	EPC Project Manager EPC HSE Supervisor/Coordinator	Prioritise procurement and employment of local businesses and workers. Reduce and avoid upward pressure on housing prices, rental costs and demand.	Project inception. Throughout construction: Monthly review of workforce and sub-contract requirements against forecast needs and targets outlined in this AES.	Embed selection criteria prioritising sub-contractors that employ workers from Dubbo and Narromine and Gilgandra LGAs or the CWO Region. Embed selection criteria reflecting preference to businesses registered in Tier 1 or Tier 2 locations.	Maintain a register of employees and subcontractors to report on 1) proportion of jobs filled by residents of Tier 1, Tier 2 and CWO Region and 2) proportion of sub-contractors appointed with businesses registered in the Tier 1, Tier 2 and CWO Region.

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Measures	Responsible Party	Objective	Timing	Implementation Action	Compliance Record
Provide transport arrangements for members of underrepresented groups employed onsite to improve job capability and performance.	Project Manager Site Manager EPC Project Manager EPC Site Manager Community & Stakeholder Engagement Officer	Prioritise local employment & skills development.	Construction and ongoing	Encourage car-pooling schedules by contractors	Maintain a register of employees from underrepresented groups. Maintain car-pooling schedules Monthly review of employee transport requirements & shift timing.
Require EPC and O&M contractors to support employment and training outcomes for apprentices, learning workers, and underrepresented groups through targets and tracking.	Project Manager EPC Project Manager Community & Stakeholder Manager	Prioritise local employment and skills development.	Prior to construction; ongoing	Partner with local/regional employment agencies to recruit job seekers who face barriers & are from under-represented groups.	Maintain a register of employees & sub-contractors to report on the proportion of jobs filled by learning workers, apprentices & under-represented groups. Monthly review of workforce requirements & sub-contract requirements against forecast need & targets outlined in this AES.

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Measures	Responsible Party	Objective	Timing	Implementation Action	Compliance Record
Partnerships with organisations working with local school(s) to identify opportunities to support students to consider pathways into renewables, including site tours & career talks.	Project Manager Community & Stakeholder Engagement Manager EPC Project Manager	Prioritise local employment and skills development.	Nearing construction - and ongoing	Meet with education and training services to identify partnership opportunities. Actively participate in career development opportunities in the region.	Record of meetings and discussions and identified opportunities; and activities such as site tours & career talks.
Establish processes and selection criteria that prioritise Indigenous employment and procurement. Partner with key First Nations regional partners to access specialised procurement sourcing panels with Certified and Registered First Nations businesses. Require EPC and O&M contractors to support genuine employment and training outcomes for First Nations. Partner with a local Aboriginal organisation/s to identify at least one work package during construction that can be delivered by a First Nation business.	Project Manager Community & Stakeholder Engagement Manager EPC Project Manager	Prioritise First Nations participation	Prior to construction Throughout construction	Embed selection criteria to prioritise sub-contractors that are Certified & Registered First Nation businesses or are owned, managed, or staffed by First Nations people. Embed targets in contracts for the construction of 3% First Nations workforce participation. Identify key representative First Nations regional partners. Re-establish & continue to develop mutually beneficial relationships with First Nations organisations, networks & businesses to identify joint initiatives that can	Maintain a register of employees & sub-contractors to report on the proportion of subcontractors demonstrating First Nations ownership or employment.

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Measures	Responsible Party	Objective	Timing	Implementation Action	Compliance Record
				support positive socioeconomic outcomes. Establish and maintain a register of local Certified & Registered First Nations businesses. Monthly review of workforce requirements & sub-contract requirements against forecast needs & targets outlined in this AES.	
Head lease proximal rental properties, if there are no on-site accommodations, in Dubbo and Narromine, where feasible, on year-long rental contracts to cover peak employment periods.	EPC Project Manager EPC HSE Supervisor/Coordinator	Prioritise the use of local accommodation. Minimise traffic impacts.	Preparation for main works construction	Headlease up to 5 available houses and encourage sharing for workers without dependents or partners. Establish a monthly review process to monitor worker accommodation requirements throughout construction.	Records of head leasing arrangements.
Prioritise booking short-term accommodation in Dubbo, followed by Narromine and Tier 2 locations.	EPC Project Manager EPC HSE Supervisor/Coordinator	Maximise the use of local services. Minimise traffic impacts.	Throughout construction: Monthly review meetings with accommodation providers.	Book short-term accommodation through priority arrangements with accommodation providers in Tier 1 and Tier 2 locations.	Monthly review documentation

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Measures	Responsible Party	Objective	Timing	Implementation Action	Compliance Record
Liaise with short-term accommodation providers to manage peak accommodation timing. Liaise with the local tourism industry and the Dubbo Regional and Narromine Shire Councils to manage potential timing conflicts or cooperation opportunities with local events.		Minimise impacts on the tourism industry and local events.	Review meetings with Dubbo Regional and Narromine Shire Councils, and tourism operators as required.	Establish a monthly review process to monitor worker accommodation requirements throughout construction.	
Manage internal human resources and hiring processes to encourage employees to share accommodation and car-pool for short-term contracts.	EPC Project Manager EPC HSE Supervisor/Coordinator	Minimise pressure on accommodation and also minimise traffic impacts	Throughout construction: Internal monthly review of contracts, housing needs and housing availability	Establish and maintain a register of projected worker accommodation requirements and options to prioritise accommodation sharing and/or clustering, especially in proximal towns.	Register of workers and accommodation forecasts and location of accommodation for workers.
Establish and maintain a register of local property owners who have expressed interest in offering dwellings for rent.	EPC HSE Supervisor/Coordinator	Prioritise the use of local accommodation.	Throughout construction: Monthly review of local property availability.	Establish a register of property owners with rooms or entire rooms to rent and maintain records of number of rooms and rental costs.	Maintain a register of housing arrangements.

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Measures	Responsible Party	Objective	Timing	Implementation Action	Compliance Record
Consideration of temporary worker accommodation facilities during peak construction if unable to secure / to reduce pressure on short-term accommodation providers during peak times.	X-Elio Project Manager EPC Project Manager EPC HSE Supervisor/Coordinator.	Reduce and avoid pressure on short-term accommodation and rental demand.	The first and second quarters of the construction period.	Liaise with DRC, short-term accommodation providers, tourism bodies, and event organisations to assess potential (cumulative) impacts on the rental market and short-term accommodation and consider alternatives.	Maintain a register of engagement with DRC and other key stakeholders.
Establish an Expression of Interest (EOI) register for local businesses and individuals seeking employment. This will include accommodation providers.	EPC Site Manager Community and Stakeholder Engagement Officer.	Prioritise local content & opportunities for local businesses, services, & workers.	Prior to construction; ongoing	Update, promote & maintain existing EOI register.	Documentation of EOIs & proportion of EOIs resulting in employment or procurement opportunities.

5.4. Roles and responsibilities

The key roles and responsibilities for the design, delivery, and evaluation of the Project's AES are outlined below in Table 5-2.

Table 5-2: AES roles and responsibilities

Positions	Responsibility
Project Manager	- Designate appropriate, sustainable and strategic AES objectives for delivery in construction of the Project - Responsible for AES implementation during construction - Liaison with DRC - Monitor the EPC Project Manager on the implementation of AES activities and targets - Reporting of AES outcomes to DRC and other stakeholders.
Site Manager	- Ensure implementation and compliance with AES activities and targets on-site together with the EPC Site Manager - Liaison with DRC, accommodation providers, employment agencies, local First Nations networks & suppliers, etc. - Monitoring, tracking, and reporting of AES outcomes against targets to the Project Manager.
Health, Safety and Environment (HSE) Manager	- Support the Project Manager to implement the AES - Liaison with contractors and relevant stakeholders involved in the AES, including local First Nations networks & suppliers.
HSE Supervisor	- Support the Site Manager to implement the AES - Liaison with onsite contractors and relevant stakeholders involved in the AES, including local First Nations networks & suppliers.
Community & Stakeholder Manager	Ensure the Project is implemented with an appropriate level of social license and that the best endeavours are made by the Project developer and its contractors to maximise local employment, procurement and accommodation.
Community & Stakeholder Engagement Officer	- Facilitate a strong working relationship with the DRC, local accommodation providers, employment and procurement agencies, local businesses, contractors, and the rest of the relevant stakeholders involved in the Project to establish and implement industry and aboriginal participation outcomes - Support the Project and Site Managers in implementing the AES.
Operations Project Manager	- Responsible for AES fulfilment during the operation phase - Monitor O&M Contractor on the fulfilment of AES activities and targets - Liaison with Dubbo Regional Council and reporting of AES outcomes.

Positions	Responsibility
EPC Project Manager	• Ensure implementation and compliance of AES activities and targets on-site • Liaison with DRC, accommodation providers, employment agencies, local First Nations networks & suppliers, etc • Reporting of AES outcomes to the Project Manager.
EPC Site manager	• Support implementation and compliance with AES activities and targets on-site • Identifying opportunities and ensuring buy-in through the tiers of EPC sub-contractors • Liaison with DRC, accommodation providers, employment agencies, local First Nations networks & suppliers, etc • Monitoring, tracking, and reporting of AES outcomes against targets to the EPC Project Manager.
EPC Health, Safety and Environment (HSE) Coordinator	• Support the EPC Project and Site Managers in implementing the AES • Liaison with EPC sub-contractors and relevant stakeholders involved in the AES, including local First Nations networks & suppliers.
O&M Project Manager	• Support the Project in fulfilling the AES during the operation phase • Liaison with O&M subcontractors and relevant stakeholders involved in the AES, including local First Nations networks & suppliers • Reporting of AES outcomes to the Operations Project Manager.

6. Monitoring and reporting

The AES considers multiple opportunities for consultation and feedback through initiatives such as enquiries and complaints registers and personal meetings with near neighbours, community groups, and key stakeholders. The outcomes of these activities must be recorded in the stakeholder register, which could then be used as a data source for monitoring and reporting.

The following metrics and strategies should underpin the monitoring and reporting of the Project. The objectives of monitoring and evaluation should be to do the following:

- Communicate and provide accountability for the objectives of the accommodation strategy
- Communicate and provide accountability for the objectives of the employment strategy
- Build community trust and engagement with Forest Glen Solar Farm
- Gather and integrate learnings for application to this and future projects
- Establish and maintain a complaint and feedback system.

The EPC Contractor will be required to report on the metrics (written into their contract) and the Project Manager will evaluate and oversee that the targets are achieved. If needed, the Project Manager will work with the Community & Stakeholder Engagement Officer to reevaluate strategies to get back on track to meet goals.

Where relevant, FGSF will include AES commitments and obligations within both the EPC Construction and O&M contracts to ensure all procurement and subcontracting activities are carried out in accordance with the AES. Under the terms of the EPC contracts, the minimum contents of monthly reports may be defined, ensuring strict reporting rules. This could mean that FGSF can track, monitor and address the compliance of the head EPC contractor (and its subcontractors). It is expected that FGSF and the head EPC contractor meet at least once a week in accordance with the EPC contract to ensure close communication between the management teams.

The EPC contractor will be required to report on the AES metrics monthly, while FGSF's reporting to external bodies, such as the DRC, will be quarterly during construction and annually during operations (unless otherwise specified). The Community & Stakeholder Engagement Officer will implement consultation during construction in collaboration with the EPC Contractor.

6.1. Compliance Commitments

The Proponent commits to compliance with the development consent requirements set out below in Table 6-1.

Table 6-1 Commitments to condition requirement

Condition	Condition requirement	Commitment
Incident notifications	C10. The Applicant must notify the Department within 24 hours of becoming aware of an incident. The notification must be made via the NSW planning portal (Major Projects) and address details of the incident including: (a) date, time and location; (b) a brief description of what occurred and why it has been classified as an incident; (c) a description of what immediate steps were taken in relation to the incident; and (d) identifying a contact person for further communication regarding the incident. C10A. The Applicant must provide the Department with a subsequent incident report in accordance with Appendix 6 (Incident Notification and Reporting Requirements).	The Proponent will provide notification of any incidents as per the incident notification conditions in C10.
Non-Compliance Notification	C11. Within seven days of becoming aware of a non-compliance, the Applicant must notify the Department of the non-compliance. The notification must be in writing and must be submitted via the NSW planning portal (Major Projects). The notification must identify the development (including the development application number and name), set out the condition of this consent that the development is non-compliant with, why it does not comply, the reasons for the non-compliance (if known), and what actions have been undertaken, or will be undertaken, and when, to address the non-compliance. Note: A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.	The Proponent will provide notification of a non-compliance to the Department within the timeframe set out in C11.

Condition	Condition requirement	Commitment
Access to Information	C20. The Applicant must: (a) make the following information publicly available on its website as relevant to the stage of the development: (i) the EIS; (ii) the final layout plans for the development; current statutory approvals for the development; (iii) approved strategies, plans or programs required under the conditions of this consent; (iv) the proposed staging plans for the development if the construction, operation and/or decommissioning of the development is to be staged; (v) a comprehensive summary of the monitoring results of the development, which have been reported in accordance with the various plans and programs approved under the conditions of this consent; (vi) how complaints about the development can be made; (vii) any independent environmental audit, and the Applicant's response to the recommendations in any audit; and (viii) any other matter required by the Planning Secretary; and (b) keep this information up to date.	The Proponent will make the listed information available as per C20.

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Appendix A Consultation

Date	Stakeholder	Consultation medium / Remarks	Discussion point
July 2024	Short Term Accommodation Provider - Quest	Email and Face-to-face	<i>Discussion about the following:</i> • busy seasons in the year • interest in leasing rooms for long term (6-12 months), and the estimated rooms/number of people that can be accommodated • if there are any competing priorities in the next couple of years (i.e. any early bookings for large projects / events that are already booked in the system) <i>Response from Quest</i> • Minimum of 4 weeks of booking is required for the below rates with cancellation policy of 4 days. Studio Apartment: \$ 249 per night One Bedroom Apartment: \$269 per night Two Bedroom Apartment: \$399.00 per night <i>Result:</i> If required, the Proponent Project Manager will contact Quest Dubbo before construction and coordinate bookings during construction and operations.
July 2024	Accommodation and Employment Network – Dubbo Business Chamber	Email and Phone	<i>Discussion point:</i> to understand the business landscape in Dubbo and see if XE can connect with the Chamber's network before commencing construction and employing businesses from within Dubbo. <i>Result:</i> Could not get a chance to connect at the time, but Project Manager will continue to liaise with the Chamber's executive team to increase employment opportunity from within Narromine and Dubbo.
July 2024	Short Term Accommodation Provider – Accommodation Choices	Email	<i>Discussion about the following:</i> • busy seasons in the year • interest in leasing rooms for long term (6-12 months), and the estimated rooms/number of people that can be accommodated • if there are any competing priorities in the next couple of years (i.e. any early bookings for large

Date	Stakeholder	Consultation medium / Remarks	Discussion point
			projects / events that are already booked in the system) <i>Response:</i> We are not doing any short-term leasing now; however, we can offer a minimum lease of 6 months for a furnished property, with a preference for longer. 2-bedroom, 1 bathroom properties starting at \$480 per week. Availability will depend on when current tenants leave which is on a rotating basis. Best idea would be to give us some idea of how many people you have and from when and we can guide you forward. - provide furnished accommodation to many corporates that stay in Dubbo during the build phase some as the mines and Abergeldie Contracting Pty Ltd. <i>Result:</i> The Proponent Project Manager will connect with Dubbo Apartments in the lead-up to construction and coordinate bookings over the construction and operations period.
July 2024	Dubbo Council	Email	<i>Discussion:</i> any available data on long-term and short-term accommodation landscape in Dubbo and the wider region. <i>Response:</i> Majority of information is in the short term worker accommodation strategy. For longer-term data, Dubbo and Wellington land and property statistics will be helpful. Currently investigating whether https://www.airdna.co is suitable, but Proponent is encouraged to also investigate this independently. <i>Result:</i> Informed that the draft AES will be submitted for the Council's review and approval.
June 2024	Dubbo LALC: Tatum Moore	Face-to-face	<i>Discussion:</i> Employment opportunities available through the LALC community in the region and how to form a partnership throughout the project's life. <i>Result:</i> The Proponent will build relationships and partnerships with key contacts in the LALC.
Aug 2024	RDA Orana	Email	Tried to connect with the CEO (Justine Campbell) but faced a schedule conflict.

Date	Stakeholder	Consultation medium / Remarks	Discussion point
			The proponent will connect with RDA Orana again to discuss potential partnership opportunities with RDA Orana's business network.
September 2024	Dubbo Council	Email	DRC reviewed and provided input to the AES
November 2024	Dubbo Council	Email	Responses to the comments regarding where the changes in the AES were made was communicated to the DRC



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