



MID-WESTERN REGIONAL COUNCIL
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Office of the General Manager

LP | LAN900165

4 July 2023

Kurtis Wathen
NSW Department of Planning and Environment
Locked Bag 5022
PARRAMATTA NSW 2142

Dear Kurtis,

SUBJECT: Advice on Environmental Impact Statement; Goulburn River Solar Farm (SSD-33964533)

Thank you for providing Mid-Western Regional Council (Council) with the opportunity to comment on the Environmental Impact Statement (EIS) for Goulburn River Solar Farm (**SSD-33964533**). Council has reviewed the documents and wishes to lodge an objection to the application.

It is understood the proposal includes the construction, operation and decommissioning of a solar farm with the capacity of up to 550 (MW), 280 (MWp) and 570 (MWh) BESS.

REASON FOR OBJECTION

Council objects to the proposal for many reasons, including noting that the documentation is inaccurate and inconsistent. Furthermore, it fails to appropriately consider the cumulative impacts of surrounding renewable energy projects within the region.

Limited community consultation and failure to consult with Mid-Western Regional Council (MWRC) demonstrates a lack of transparency and respect for the stakeholders affected by this project.

The EIS has proposed that accommodation be sourced from surrounding towns, including towns within the Mid-Western Region, Mudgee, Gulgong and Rylstone.

Council is strongly concerned with this aspect of the project. There is currently a severe shortage of appropriate accommodation in the region for tourism, caused by the competing demands placed on accommodation availability by State Significant Developments (SSD). What the proponent fails to address is that there are multiple projects within and surrounding the Mid-Western Region looking to construct at the same or similar time.

This shortage/competition will be particularly evident during the construction phase, which coincides with the peak construction periods of several other SSD projects in the region that are either approved or in the assessment/consultation phase. More projects are planned every day to meet the objectives of the Renewable Energy Zone, including:

- Wollar Solar (400 workers)
- Stubbo Solar Farm (520 workers)
- Barney's Reef Wind Farm (250 workers)
- Bellambi Heights BESS (100 workers)
- Birriwa Solar Farm (600 workers)
- Valley of the Winds Farm (800 workers)
- Central-West Orana REZ Transmission Project (workers 1800)
- Liverpool Range Wind (800 workers)
- Orana Wind (580)
- Bowdens Silver (320 workers)
- Coal Mine expansions (250 workers)
- Tallawang (525 workers)
- Narragamba (400 workers)
- Valley of the Winds (400 workers)

In total, the projects above require up to 7745 workers, most of whom need to be housed in the Mid-Western Region LGA.

The workforce and accommodation strategy should consider that Council strongly objects to the use of tourist and visitor accommodation for any construction workforce, and there is limited availability across all accommodation types in the Mid-Western region.

Feedback on the Environmental Impact Statement

3.4.1 Construction Workforce

The EIS notes that there will be an estimated 350 FTE workers during peak construction, expected to last approximately 27 months. Considering the current unemployment rate in the Mid-Western Local Government Area (LGA), of 1.7%. Mid-Western Council requests more detail on how the 35% (122 local workers) will be sourced.

3.4.7 Construction Traffic

The EIS notes that some movement of personal light vehicles from the south is anticipated. Council requests more specific details regarding traffic movements, in particular if they are planned to be within the Mid-Western LGA.

6.9.1.3 Parking

The EIS notes that the closest formal parking facilities are located in the towns of Merriwa and Wollar, about 20 to 30 km from the site.

Council requests more information on such proposed parking and can advise there are no formal parking arrangements agreed to for Wollar. Furthermore, Mid-Western Regional Council does not support "park and ride" type purposes on public land due to insufficient car parking availability in the region, and no public car parks or public road infrastructure are to be used for park and ride.

It requests the proponent consider the status and timing of all other state significant developments within the Mid-Western Region, where a similar solution is proposed, to minimise any adverse cumulative impacts.

6.9.3.4 Impact on Road Network

The EIS notes that during peak construction, the following traffic movements are anticipated to be generated by the project: Shuttle buses – 15 x two-way trips per day.

Light vehicle and shuttle bus trips were evenly distributed on the road network, with equal proportions travelling to and from the Project Area from the north and south.

Please note that proposed routes need to be discussed with Council.

6.12.2 Stakeholder Engagement

The EIS notes that 4 accommodation participants, 3 members of the broader community, no education providers and 5 local businesses were consulted during the EIS phase, as well as other stakeholders. Mid-Western Regional Council has not been consulted regarding this project, however the EIS proposes use of local accommodation and roads in the region.

Council requests the proponent provide details on its ongoing communications plan and identify mechanisms by which the community can provide feedback during construction and operations. This should also include the proponent's approach to dealing with complaints or compliance issues, how to increase the participation of the community, and how it plans to consult with Council.

6.12.3 Social Baseline

The EIS notes that the Project's social impact assessment study area includes Mid-Western Regional LGA and includes the rural localities including Mudgee, Rylstone and Gulgong. The availability of short-stay accommodation in towns most proximal to the Project is limited, however a range of options exist in nearby regional centres. Most accommodation options are within a 60-minute drive of the Project and are located in the towns of Mudgee and Scone. However, there are also options in smaller townships located closer to the Project Area, including Gulgong, Rylstone, Denman and nearby Merriwa.

Mid-Western Regional Council requests a detailed Workforce and Accommodation Strategy be developed in consultation with Council. This should note that Council does not support the use of tourist and visitor accommodation to be included in the Goulburn River Solar Project Workforce and Accommodation Strategy. Council has actively worked to promote sustainable tourism and ensure that our local tourism industry thrives. The Mid-Western Regional Economic Development Strategy (REDS) – 2023 identifies tourism as an important engine industry for the local economy. Accommodation availability is key to the success of this industry.

Council also requests detailed information on how health care challenges are being mitigated.

6.13.1 Methodology

The EIS notes that mitigation measures relating to accommodation, workforce and procurement, and community benefit sharing were proposed.

Council requests to be informed of what these mitigation measures are. To date, no such information has been shared with Council.

6.13.2.2 Labour Force, Occupation and Business Structure

The EIS notes that the latest available employment related census data (ABS Census 2016) shows 45.9% of employed residents in the Study Area were occupied in activities generally associated with the types of skills required for the construction of a solar farm (e.g., technicians and trades workers, machinery operators and drivers, and labourers). The Study Area's representation in these occupations is well above the State average of 27.8%, indicating a generally suitable occupational base for the proposed project is in the region.

The Study Area's occupational and business structures indicate a good base exists to service the needs of the Project.

Council require more accurate data, as the ABS Census 2016 is not the most up-to-date information. Council is greatly concerned that use of such data and statements is incorrect and misleading.

6.13.2.3 Township Services

The EIS notes that current accommodation data reflects a constrained rental market in the Study Area, with vacancy rates generally below 1.0%. At the same time, data shows 13.7% of Study Area dwellings (3,360 dwellings) were unoccupied at the 2021 Census, which is notably higher than the average for NSW (9.4%). Mid-Western Regional LGA had a significant share of unoccupied dwellings (15.0%) or 1,700 dwellings, likely related to many holiday homes in this well toured area. The major regional townships of Mudgee and Scone have the capacity and labour force to service many aspects of the Project, with smaller settlements such as Merriwa, Gulgong, Denman and Rylstone likely to provide labour, accommodation and other general services to the Project.

Council does not support the use of tourist and visitor accommodation for any construction workforce. That data above is not current or valid. It does not consider SSD projects already approved and using such available accommodation.

6.14 Waste Management

The EIS notes that evidence from local councils or facilities that the identified waste classifications and volume **can be** accepted at the appropriate stage of the project's life cycle. Mid-Western LGA Facilities: Gulgong Waste Facility (approximately 50 km south-west of the Project) - waste accepted at this facility includes general waste, recycling, green waste, scrap metal and e-waste. Mudgee Waste Facility (approximately 57 km south-west of the Project) is the LGA's primary facility for receiving commercial and building waste. Other waste accepted at this facility include general waste, recycling, green waste, scrap metal, e-waste, tyres, mine waste, dead animals (by appointment) and asbestos (by appointment).

Kandos Waste Facility (approximately 60 km south-east of the Project) – waste accepted at this facility includes general waste, recycling, green waste, scrap metal and e-waste.

Council would like to note that Mid-Western Regional waste facilities are NOT appropriate or capable to handle the disposal of landfill waste generated by the project. Gulgong Waste Facility is not a landfill facility, accepting mainly residential type wastes. All material deposited at Gulgong Waste Facility is transported to Mudgee's Waste Facility. The Mudgee Waste Facility has no capacity to take large quantities of landfill material likely to be generated by the project, as the capacity of the existing Waste Cell is almost exhausted. Other materials need to be discussed with Council prior to disposal. Council requests the proponent provide specific details about the expected waste to be generated during each phase and how it will be managed. Further, a waste management plan is to be developed in consultation with Council.

9.4 Environmental, Cumulative, Social and Economic Impacts

The EIS notes that consultation has taken place with relevant government agencies

Mid-Western Regional Council has not been approached or had any consultation with the Proponent regarding the project. Council has since contacted the Proponent asking for information after the EIS was put on Exhibition. Council requests consultations be initiated to ensure that the Council and the community have current and accurate information about the project, and to provide feedback on the proposed project, including traffic, construction and social impacts. As such, consultation should include the provided impact area, including Mudgee, Gulgong, Rylstone, where the proponent proposes to source and house workers.

Traffic Management Plan

Council requests the submission of an updated traffic management plan for comment alongside the Accommodation and Employment Strategy. The revised plan should detail any revised traffic flow, safety measures, signage, and any alternative routes or transportation

options noted in the Accommodation and Employment Strategy, which will be implemented to minimise disruptions to community and local businesses.


Council note;

- The road routes affecting Mid-Western Regional Council (MWRC) comprise Wollar Rd and Ringwood Rd
- Wollar Rd is an approved B-Double route.
- Ringwood Rd is an unsealed local road carrying low traffic volumes under existing conditions (<14 vehicle movements during peak hours). The segment length under MWRC control is 1.32km. The formation width is 6m.
- OSOM vehicles would be limited to access from the north via Golden Hwy/Ringwood Rd/Wollar Rd (Upper Hunter).
- For Wollar Rd/Ringwood Rd (MWRC), vehicles would be limited to light vehicles, shuttle buses only.
- Traffic modelling assumes peak hour volumes of 30 two-way trips light vehicles and 8 two-way trips for a shuttle bus on Wollar Rd/Ringwood Rd during the project construction period.
- Additional turn treatments upgrade to Wollar Rd/Ringwood Rd intersection will not be required due to the soar farm construction.
- The traffic assessment has considered cumulative traffic volumes on construction routes overlapping with other REZ projects undertaken during the same construction period. No upgrades required to other roads within the MWRC area.

Council require the proponent to upgrade 1.32km of Ringwood Road. Specification is to include 6.0m 14/7 double/double bitumen seal.

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

Yours sincerely,

A handwritten signature in black ink, consisting of a stylized capital 'B' followed by a horizontal line.

BRAD CAM
GENERAL MANAGER