

Office of the General Manager

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15 June 2022

Attention: Natasha Homsey
NSW Department of Planning, Industry and Environment
4 Parramatta Square, 12 Darcy St
PARRAMATTA NSW 2150

Dear Natasha

SUBJECT: VALLEY OF THE WINDS WIND FARM ENVIRONMENTAL IMPACT STATEMENT (EIS) SSD - 10461

Reference is made to the exhibition of the above proposal and Council's previous response to the request for Secretary's Environmental Assessment Requirements (SEAR's). In that response Council requested the EIS specifically address Transport, Construction Workforce and Community Consultation, as it impacts the Mid-Western Regional LGA.

Having reviewed the EIS, Council wishes to again raise concerns about the Construction Workforce and requests further consideration be given around Waste Management and Decommissioning.

Construction Workforce Accommodation

The EIS notes there will be an estimated 400 workers during the peak construction period, which is expected to commence in the first quarter of 2023 and run for a period of approximately 24 – 42 months. The EIS has proposed that accommodation be sourced from surrounding towns and has assumed 60 of these workers would reside within Gulgong and 80 within Mudgee, totalling 140 beds.

Council are strongly concerned with this aspect of the project as there is currently a severe shortage of appropriate accommodation in both these towns for tourism, made worse by the competing demands placed upon accommodation availability by State Significant Developments (SSD) and other major project construction workforces for developments approved by Council.

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, with more projects being planned every day aiming to meet the objectives of the Renewable Energy Zone. This includes:

- Wollar Solar (400 workers)
- Stubbo Solar Farm (400 workers)
- Burrendong Wind Farm (450 workers)
- Tallawang Solar Farm (430 workers)
- Barney's Reef Wind Farm (340 workers)
- Birrawa Solar (800 workers)
- Bellambi Heights Solar (400 workers)
- Bowdens Silver (320 workers)
- Local Coal Mine expansions (250 workers)

In total, the projects above require 3,200 workers with the majority needing to be housed in the Mid-Western Region LGA and does not account for the workforces of other significant projects such as the transmission line construction for the Renewable Energy Zone, Inland Rail or other significant local construction projects approved by Council.

Mid-Western Region has limited accommodation capacity with only 3,300 visitor beds spread over 602 venues, as sourced from *Localis Data*. The majority of these beds are required to service the Region's Tourism Sector which generates upwards of \$160M annually for the area. Any competition with tourism accommodation and the long-term economic viability of the sector by short-term construction workforces is not supported and is strongly opposed by Council.

Although Warrumbungle Shire Council have expressed a preference for the construction workforce to be spread out around the nearby towns, Mid-Western Regional Council strongly opposes this option and seeks either the revision of accommodation sourced from surrounding towns or strongly supports the development of purpose-built workforce accommodation.

Waste Management

The EIS notes that the Gulgong Waste Facility and Mudgee Waste Facility are potentially available waste facilities for the disposal or management of wastes. In this regard, Council wishes to advise that neither facility is appropriate or capable to handle the disposal of wastes generated by the project. Gulgong Waste Facility is not a landfill facility, accepting mainly residential type wastes. All material deposited at Gulgong Waste Facility are transported to Mudgee's Waste Facility. The Mudgee Waste Facility has no capacity to take large quantities of material likely to be generated by the project as the capacity of the existing Waste Cell is almost exhausted.

Decommissioning and Rehabilitation

Council requests that a detailed decommissioning and site restoration plan be provided so that the impacts of the development be properly assessed and Council, as well as residents, would have confidence that the land could be returned to an agricultural use. It is appropriate for such a plan be prepared and conditioned to include the following, at a minimum:

- The anticipated present value cost of decommissioning works, along with an explanation of the calculation of that cost (including a buffer for changes in market values / inflation).
- The physical plan for decommissioning, prepared or certified by an engineer, confirming that full remediation / restoration of the site to its former primary production use / class land capability is possible.

- Commitment to a financial security to cover the cost of decommissioning.
- Management and waste reduction initiatives proposed during all 3 phases of the development and a commitment as to where this waste will be disposed and/or recycled, without impacting on local waste facilities and in accordance with:
 - Protection of the Environment Operations Act 1997
 - Protection of the Environment Operations (Waste) Regulation 201
 - Waste Avoidance and Resource Recovery Act 2001
 - NSW Environment Protection Authority (EPA) Waste Classification Guidelines
- Ideally, the above information should be updated every 5 – 7 years to keep up with changes.

Should you have any further enquiries in relation to this matter, please contact Council on (02) 6378 2850.

Yours sincerely

A handwritten signature in black ink, appearing to be 'BRAD CAM', with a stylized flourish at the end.

BRAD CAM
GENERAL MANAGER