

# NEOEN



## CULCAIRN SOLAR FARM

### ACCOMMODATION AND EMPLOYMENT STRATEGY

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Prepared by NGH Pty Ltd on behalf of Neoen



## Document Control

History	
Version:	V4
Nature of change:	Integration of Industry and Aboriginal Participation Plan, and Accommodation Strategy, into combined Accommodation and Employment Strategy.
Related Documents	
1.	Culcairn Solar Farm Community Communication Strategy
2.	Neoen Sustainability Framework
3.	Neoen Reconciliation Action Plan (RAP)
4.	Culcairn Solar Farm Business Register (internal)

Prepared by NGH Pty Ltd on behalf of Neoen.

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## Acknowledgement of Country

Neoen would like to acknowledge the traditional custodians of the country on which we work, in particular the Wiradjuri people on whose land Culcairn Solar Farm is proposed. We pay respect to their connections to land, sea and the community. and we pay our respect to the Elders – past, present, and future.

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## ACRONYMS AND ABBREVIATIONS

ABS	Australian Bureau of Statistics
AES	Accommodation and Employment Strategy
CCS	Community Communication Strategy
CoC	Condition of Consent
DPE	Department of Planning and Environment (NSW) (formerly DPIE)
EIS	Environmental Impact Statement
EMS	Environmental Management Strategy
EP&A Act	Environmental Planning and Assessment Act 1979 (NSW)
EPC	Engineering, Procurement and Construction
FTE	Full-time equivalent
GHC	Greater Hume Council
GHS	Greater Hume Shire
GW	gigawatt
ha	Hectares
HSE	Health, safety, and environment
IAPP	Industry & Aboriginal Participation Plan
IRSAD	Index of relative socio-economic advantage and disadvantage
km	kilometres
LALC	Local Aboriginal Land Council
LGA	local government area
m	metres
MW	megawatt
NSW	New South Wales
O&M	Operations and Maintenance
PET	polyethylene terephthalate
REZ	Renewable Energy Zone
SAL	Suburb and Locality
SEIFA	Socio-economic indexes for Australia
SSD	State Significant Development
TO	Traditional Owner
UCL	Urban Centre and Locality

# 1. INTRODUCTION

Neoen received development consent for the Culcairn Solar Farm (SSD-10288) on 25 March 2021. The Culcairn Solar Farm (the Project) is located on rural land, approximately 4 km southwest of Culcairn, New South Wales (NSW), within the Greater Hume Shire local government area (LGA). The Project involves the construction, operation and decommissioning of a 350MW solar farm and associated infrastructure.

Neoen is a French company specialising in renewable energy production, with more than 3.3 gigawatt (GW) of renewable energy in operation or under construction in Australia. The company’s decade-long track record of delivery and innovation has been instrumental in accelerating the pace of Australia’s energy transition. Its success is underpinned by the support and involvement of communities, alongside government, network operators, suppliers, customers and financial partners.

The development consent was granted by the Independent Planning Commission of NSW under Section 4.38 of the NSW *Environmental Planning and Assessment Act 1979* (EP&A Act).

## 1.1 Purpose

The purpose of this Accommodation and Employment Strategy (AES) is to outline the proposed approach and objectives for the management of social impacts and opportunities related to accommodation and employment associated with the construction and operation of the Project. This AES has been prepared to fulfill the requirements of Schedule 3, Condition 33 of the development consent for the Culcairn Solar Farm. A compliance matrix for this AES and Schedule 3, Condition 33 is presented below in Table 1-1. This AES will be implemented following Planning Secretary Approval.

*Table 1-1 Schedule 3, Condition 33 requirements*

Schedule	Condition	Relevant section of this AES
3	33. Prior to commencing construction, the Applicant must prepare an Accommodation and Employment Strategy for the development in consultation with Council, and to the satisfaction of the Planning Secretary. This strategy must:	
	a) Propose measures to ensure sufficient accommodation for the workforce associated with the development;	Section 6
	b) Consider the cumulative impacts associated with other State significant development projects in the area;	Section 3.2
	c) Investigate options for prioritising the employment of local workers for the construction and operation of the development, where feasible; and	Section 5
	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 7
	Following the Planning Secretary’s approval, the Applicant must implement the Accommodation and Employment Strategy.	

This AES includes an Industry and Aboriginal Participation Plan (IAPP), which underpins the employment strategy. It has been developed in accordance with principles and best practice guidelines, including the *First Nations Guidelines – Increasing income and employment opportunities from electricity infrastructure project* (OECC, 2022). As social value is also likely to flow through other activities undertaken by the Project, this AES is linked to the Project’s Community Communication Strategy (CCS).



## 1.2 Consultation

In the development of the Culcairn Solar Farm, Neoen has undertaken consultation with host landholders and other key stakeholders to inform project design and to explore opportunities to maximise local benefits and create sustainable social outcomes at the local and regional level.

This AES has been developed in consultation with the Greater Hume Council and identifies the employment and accommodation requirements and considerations for the solar farm, during construction and operational phases. A copy of the draft AES was provided to Council's General Manager and Director of Environment and Planning by email on 26 June 2023, and Council's confirmation of review was received on 18 July 2023. Details of stakeholder consultation are provided Section 6.2 and in Appendix D.

## 1.3 Governance

The AES is intended as an iterative document, to be utilised by Project Managers and site-based teams to ensure that the implementation of the AES is consistent and coordinated.

The AES and associated commitments will be embedded into Neoen's contracts with nominated engineering, procurement and construction (EPC) and operations and maintenance (O&M) contractors, to ensure that the approach and requirements are consistent, coordinated and flow down through the tiers of subcontractors at all levels of the Project.

The AES is one of several strategies and plans that form part of the Environmental Management Strategy (EMS) that provides the strategic framework for the overall environmental management for the Project. The intent of this framework is to achieve the specific environmental and social performance criteria established under the development consent.

To achieve this and fulfill the requirements of Condition 1, Schedule 2, Neoen will ensure all reasonable and feasible measures are implemented to prevent and/or minimise any material harm to the environment that may result from the construction, operation, upgrading or decommissioning of the development.

To fulfill the requirements of Condition 2, Schedule 2, Neoen will ensure that this development will be undertaken generally in accordance with the EIS and the conditions of consent.

## 1.4 Review

Consistent with Condition 2, Schedule 4 of the development consent, Neoen will a) update the AES to the satisfaction of the Planning Secretary prior to carrying out any upgrading or decommissioning activities; and b) 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 7, Schedule 4; submission of an audit report under Condition 11, Schedule 4; or any modification to the conditions of the development consent.

Additionally, Condition 3, Schedule 4 provides that Neoen may at any time submit a revised AES to the Planning Secretary for approval.

Periodic evaluation and review of the AES will 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 Neoen's approach, namely that:

- Desired social procurement objectives are being achieved by Neoen 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, to respond to legislative changes or address an actual or potential non-compliance, the Neoen 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.

## 2. REGIONAL CONTEXT

The Project site lies within the Greater Hume Shire (GHS) LGA in the South East Riverina Region of NSW, on the traditional lands of the Wiradjuri people. The development site (1317 ha) is agricultural land comprising several large paddocks that are generally flat and largely cleared and cultivated primarily for cropping. The proposal is bound by Walbundrie Road (north), Weeamera Road (east), Cummings Road (west), and Benambra Road (south). The Project site is located approximately one kilometre north of the approved Walla Walla Solar Farm, which is anticipated to be operational by mid-2024. The Project site and social locality are shown in Figure 1-1.

Major centres and/or towns in the area (horizontal distance from development site) are shown below in Table 2-1. For most residents of Walla Walla and Culcairn, Albury is the main regional centre used to access services and recreation.

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

Location	Distance from development site	Population	First Nations population	Median age (years)	SEIFA IRSAD <sup>1</sup> decile
Culcairn SAL	4km northeast	1,483	5.4%	44	2
Walla Walla SAL	4km southwest	811	3.7%	44	2
Henty SAL	17km north	1,225	4.5%	51	2
Jindera SAL	26km south	2,721	3.0%	38	6
Holbrook SAL	29km east	1,650	3.1%	51	2
Albury UCL	38km south	53,677	3.9%	39	n/a
Lockhart SAL	55km northwest	1,019	6.4%	51	2
Wagga Wagga UCL	69km northeast	49,686	7.4%	37	n/a

(Source: ABS 2021 Census)

The Albury, Wodonga, and Wagga Wagga LGAs have a major influence on the Greater Hume Shire through employment and access to higher level goods and services (GHC, 2020). The Riverina Murray Regional Plan 2041 notes that recognising the regional cities of Albury, Wodonga and Wagga Wagga and their surrounding areas as single housing markets will provide opportunities for these communities. Under Collaboration Activity 7 in the Regional Plan, the Department of Planning and Environment (DPE) will work with Greater Hume Council (GHC) to respond to potential housing and economic impacts and opportunities from the growth and development of Albury and Wagga Wagga, particularly for Culcairn (DPE, 2023).

In recognition of the broader extent of the social locality, these adjacent LGAs have been considered in the data analysis for and development of this AES.

<sup>1</sup> 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. The Index of Relative Socio-economic Advantage and Disadvantage (IRSAD) is reported here.



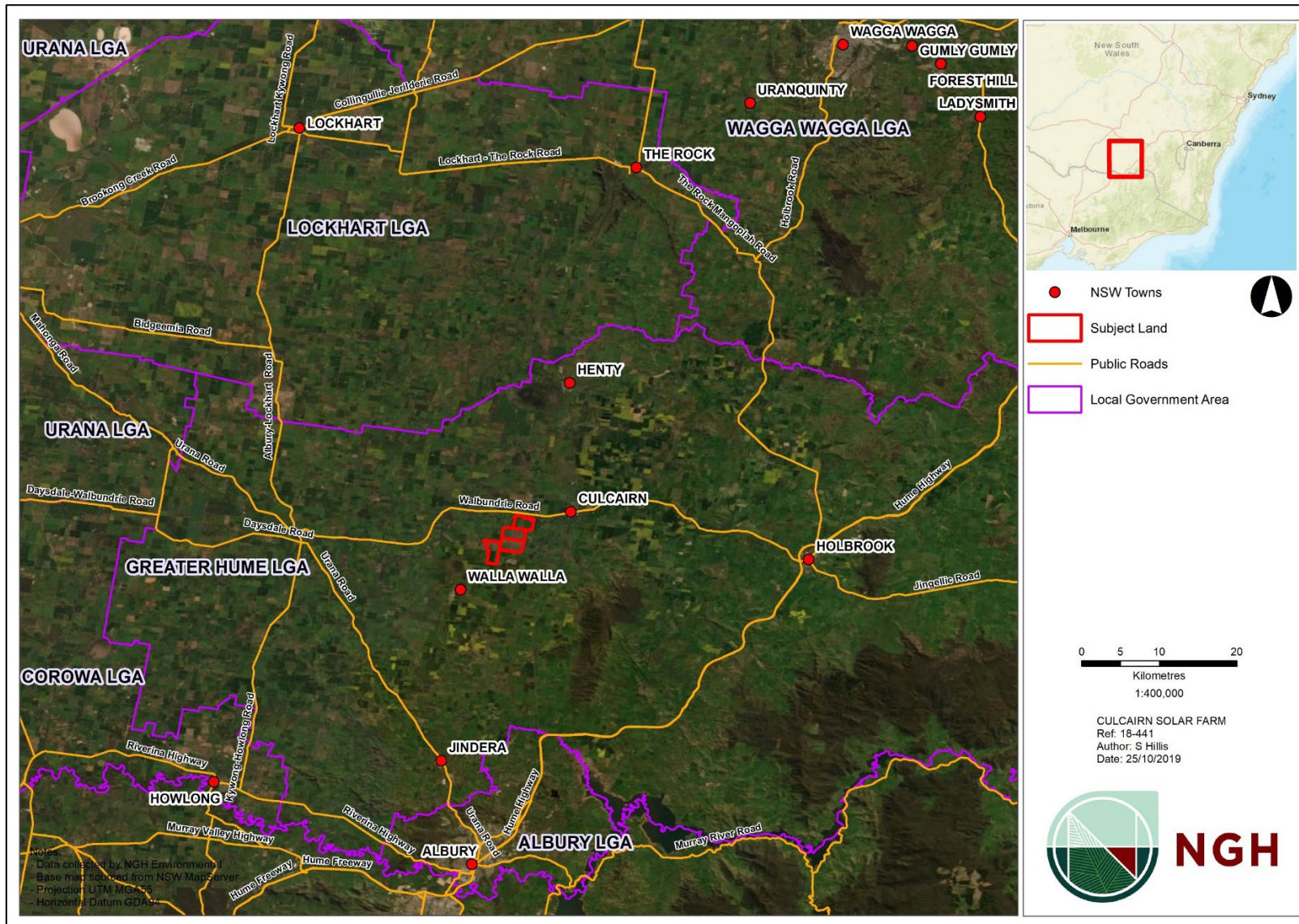


Figure 2-1 Project site and locality

## 2.1 Population

At the time of the 2021 ABS Census, the estimated population of the Greater Hume Shire (GHS) LGA was 11,157 people. The LGA's population was relatively older, with a median age of 44 years and a higher proportion of people aged 65 years and over (22%) compared to NSW (39 years, 18%). A lower proportion of GHS LGA's population (58%) was in the working age bracket (15 to 64 years) compared to NSW (64%) (ABS, 2021). The LGA's population is projected to grow to 13,459 people by 2041, an annual growth rate of around 1.1%, primarily driven by an increase in older age groups (DPE, 2022).

Other key differences between the GHS LGA population compared to NSW (ABS, 2021):

- Most of the GHS LGA population lived in a separate house (97%, NSW 66%).
- Higher proportions of owner-occupied private dwellings (78.5%, NSW 64%).
- Lower proportions of renters (15%, NSW 33%).
- Of family households, relatively more couple families without children (45%, NSW 38%).
- Fewer residents had a tertiary degree (14%, NSW 28%).
- Lower median weekly household income (\$1,420, NSW \$1,829).
- Lower rates of housing stress, both for mortgage households (11%, NSW 17%) and renter households (24%, NSW 36%).

## 2.2 First Nations

The Traditional Owners (TOs) of the land on which the Culcairn Solar Farm will be located are the Wiradjuri people. Wiradjuri Country is the land of the three rivers: the Wambool (Macquarie), the Kalare (Lachlan) and the Murrumbidgee. In 2021, the Murray region had an Aboriginal and/or Torres Strait Islander population of 4%, compared to 3.4% for NSW (ABS 2021). The proportion of Aboriginal and/or Torres Strait Islander people resident in the GHS LGA in 2021 was on par with NSW (3.4%).

There are several First Nations groups, communities and organisations in Albury and surrounding areas, including the Albury and District Local Aboriginal Land Council (LALC).

## 2.3 Services and facilities

It is likely that Culcairn and Walla Walla would be the key local service centres for the Culcairn Solar Farm construction work force. Existing services and facilities in Culcairn and Walla Walla include:

- Retail services: Supermarket (FoodWorks), grocery store, butcher, bakery, restaurants, pubs, cafes, newsagencies, petrol stations, post offices.
- Health services: Culcairn Multipurpose Service (Accident and Emergency Department, hospital and residential aged care and allied services), medical clinics, pharmacies.
- Accommodation services: hotels, motor inn, caravan park.
- Emergency services: Police stations, Rural Fire Service, State Emergency Service (SES).
- Educational facilities: Primary and high schools.
- Cultural facilities: Library, churches.
- Recreational facilities: swimming pool, bowling and golf clubs, sportsgrounds, football, tennis and netball clubs, cricket facilities, pony club, a skate park, and a walking and bike track. Parks and gardens, including Eric Thomas Park and Jubilee Park.

Other local towns such as Gerogery, Jindera, Henty and Holbrook provide limited services that include essential businesses such as, but not limited to, a supermarket, newsagency, cafes, petrol stations, and post offices.

Albury-Wodonga and Wagga Wagga, as the closest major regional centres, offer a greater number and broader range of similar services, as well as higher order services, including hospitals and specialist medical services, accommodation, and higher education institutions. Both Albury and Wagga Wagga host campuses of Charles Sturt University and provide a range of transportation options, including regional airports and rail.

## 2.4 Regional economy

A strong agricultural sector has traditionally underpinned the Greater Hume Shire's economy. The prime agricultural land supports productive rural industries of mixed farming enterprises, primarily grazing of beef, lamb and wool production, and grain production of wheat, oats, barley and canola (GHC, 2020). In 2021, the agriculture, forestry and fishing industry sector made the greatest contribution to economic output in the LGA (\$441.1m), and was also the largest employer with 1,125 jobs, representing almost a third of total employment (32%) (Remplan, 2023). Other key industries of employment included education and training (12%), manufacturing (10%) and construction (8%).

The agricultural sector is increasingly supported by value adding operations including a tannery in Culcairn and an oat mill in Walla Walla. The Greater Hume Council anticipates that technological advances will continue to provide an opportunity to attract complementary value-add agribusinesses to the LGA (GHC, 2020).

In 2021, of the 58% of the population in the GHS LGA aged 15 years and over who were in the labour force, 58% worked full-time, 32% worked part-time, and 2.9% were unemployed. Unemployment has averaged 2% over the four quarters to March 2023, indicating tight labour market conditions (JSA, 2023).

It is estimated that there are 4,664 employed people who live in the GHS LGA. Over a third of the LGA's workforce is employed in Albury (29%) and Wodonga (8%), and 2% in Wagga Wagga (Remplan, 2023).

In the broader region, defence bases are located around Wagga Wagga and Albury-Wodonga, and there is a diverse range of defence industry and supply chain capability across the region.

The Riverina Murray continues to modernise its manufacturing capability and has regional strengths in advanced food manufacturing, metal fabrication, paper and pulp manufacturing, ag-tech and is a leading region for new Circular Economy investments including the nation's largest PET (polyethylene terephthalate) recycling plant, capable of processing one billion plastic bottles each year at Nexus Albury. There are more than 900 businesses employing almost 12,000 people in the manufacturing industry in this region.

## 2.5 Riverina Murray Region

### 2.5.1 Infrastructure Pipeline Projects

To set achievable participation targets for Culcairn Solar Farm, the regional conditions that are impacting workforce participation and capacity need to be understood.

Australia is in the middle of an unprecedented infrastructure boom that is presenting both considerable opportunities and challenges for the regions. The *Business NSW 'Down to the Wire'* report suggests several reasons for this, including a backlog of projects following years of underinvestment; the need to prepare Australia for expected population growth over the coming decades; the need for better transport and freight connectivity; and the need to reorient Australia's energy system to meet the challenge posed by climate change and to curtail greenhouse gas emissions.

In the Riverina Murray region, the next two to five years will see over \$5 billion invested in nationally significant large infrastructure projects, building unprecedented workforces and supply chain and services, with peak productivity expected in 2023–2024. Several megaprojects in the region and dozens of smaller projects to upgrade the region's roads, intermodals, hospitals, defence bases, energy supply (Figure 2-1).



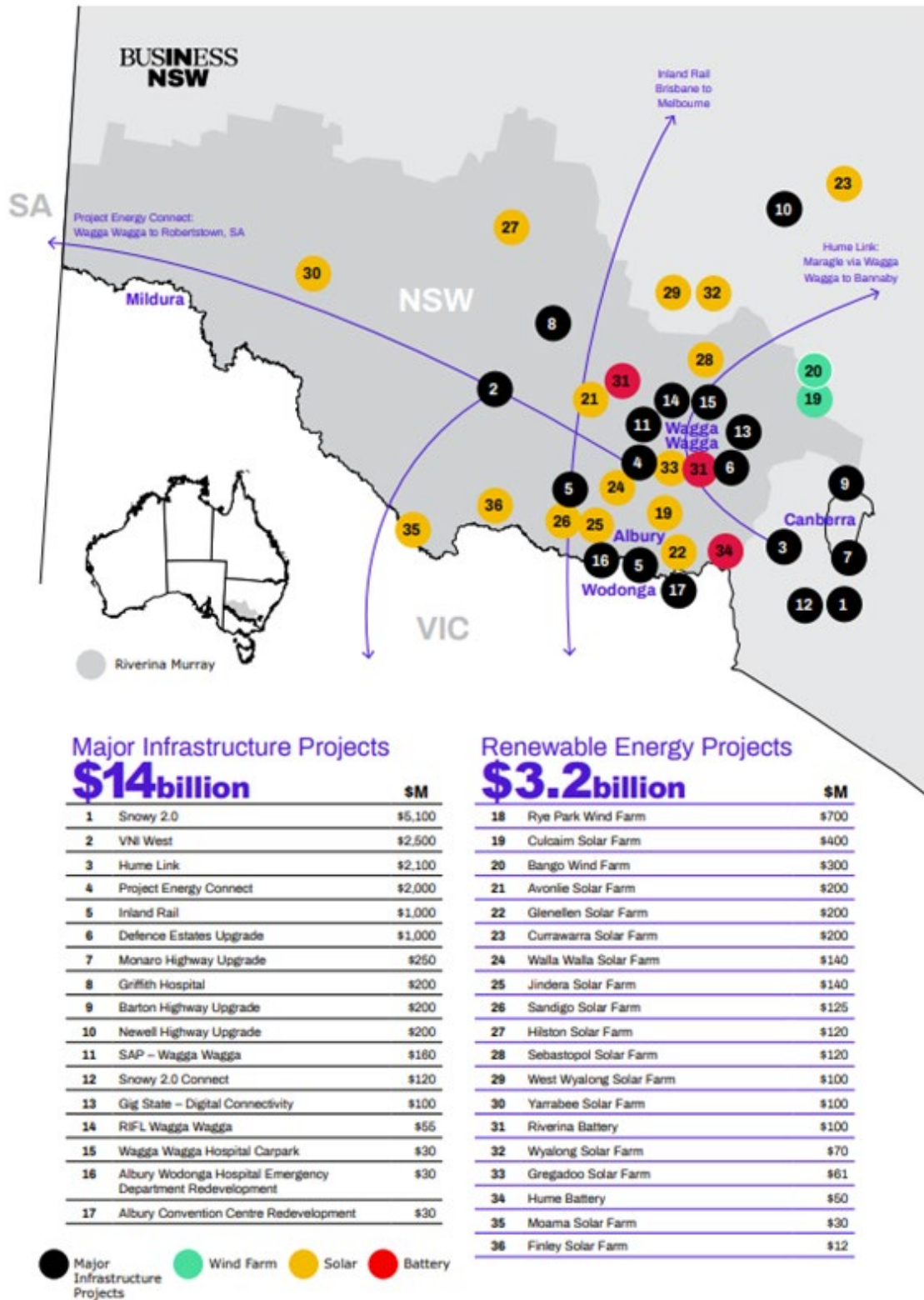


Figure 2-2 Riverina Murray region pipeline of major projects

(Source: Business NSW, 2022: Down to the Wire, p. 12.)

Considered the largest renewable energy project in Australia, Snowy 2.0 is the next chapter in the Snowy Hydro Scheme's history. It will provide an additional 2,000 megawatts of dispatchable, on-demand generating capacity and approximately 350,000 megawatt hours of large-scale storage to the National Electricity Market.

The Riverina Murray will be home to the South West REZ, with many wind, solar and battery projects coming online throughout the next decade. The region will see significant investment in transmission infrastructure, including Project Energy Connect and Hume Link, to create the backbone of the REZ. This will create careers for planners, construction engineers (including blast, civil, environmental, electrical) and various specialist roles.

The Albury to Illabo project will upgrade approximately 185km of the existing freight rail corridor between the Victoria/NSW border and Illabo in regional NSW. Expected to commence construction in 2024, this will form part of the Inland Rail line linking ports at Melbourne and Brisbane with the agricultural heartlands of NSW.

## 2.5.2 Challenges for the Riverina-Murray Region

The Riverina Murray region typifies the pressures that can be created with major projects being established in the same place at the same time.

During the development of the Culcairn Solar Farm AES, many First Nations and Industry stakeholders highlighted the same constraints around workforce capacity in the Riverina-Murray Region. These constraints are largely due to what has been referred to as 'a perfect storm' – a combination of workforce and supply chain constraints and cumulative impacts, due to the presence of many current and future infrastructure projects (currently in the pipeline) across the region. Subsequently, it is a challenging environment to establish achievable participation targets. There are a broad range of challenges that will have potential impacts on the development of the Culcairn Solar Farm.

### Cumulative Impacts

The cumulative impacts of multiple construction projects are forecast to have serious impacts for the region. A lack of coordination between multiple projects is likely to cause significant challenges for local communities' liveability and infrastructure and service accessibility, resulting in cost escalation and delays given an already stretched labour pool. Investment in long-term permanent employment opportunities is needed to sustain and grow regional communities and project evaluations and environmental impact assessments must commit greater time to consider the cumulative impacts on labour market and supply chain impacts.

Additionally, three of the six Victorian REZ, three of which are close to the state border with NSW and the Riverina Murray region. Projects within these REZ are likely to contribute to the broader regional impacts, particularly on border communities.

### Workforce capacity

The shortage of suitably qualified workers will intensify as competition for available skills increases and major infrastructure projects progress in 2023–26, when many major projects are in the construction phase. While not all will be in construction simultaneously, all will require engineering, construction, project managements and support workforces to be available during the peak years between 2023–2026.

A Business NSW 2022 Workforce Skills Survey conducted in June 2022 found that 93% of businesses reported that they were already experiencing workforce shortages. Local consultation has also highlighted that many smaller regional based businesses are already reporting 'poaching' of workers for large infrastructure projects, undermining the long-term viability of many small business operators. Of the 50 occupations identified as relevant to public infrastructure, 16 occupations are currently rated as likely to be in shortage and 18 are rated as potentially in shortage. Key constraints are identified both in the larger occupational groups (such as electricians, construction managers, electrical and grid engineers), but also some more specialised jobs (such as line workers for transmission construction or crane operators for wind

power construction). Occupations currently listed on the skills shortage and skills needs lists (electricians, telecommunications engineers) present a higher level of risk, where the potential for border closures or limits on skilled migration present supply constraints.

## **Supply chain impacts**

Supply chain impacts will be exacerbated over the coming years, with renewable energy significantly increasing consumption of steel and concrete. Australia produces 29 million m<sup>3</sup> of concrete and 5.6 million tonnes of crude steel per year, with demand for steel for electricity generation and transmission accounting for a tenth of the Australian yearly production (600,000 tonnes) and concrete requirements nearly 1.3 million m<sup>3</sup> per year (Business NSW, 2022). The largest source of steel consumption is wind turbine towers but solar farms, rooftop solar, pumped hydro storage and transmission towers are all notable sources of demand for steel. Importantly, most of the steel is currently imported although there are local wind tower manufacturers, and a transmission tower factory is being established. For concrete, the primary source of consumption is pumped hydro storage and secondarily wind turbines. Based on a case study of NSW, State REZ programs could significantly bring forward material requirements with the peak consumption of steel more than double and concrete consumption over 50% higher in the mid-2020s.

## **Accommodation pressures**

Accommodation pressures are resulting in a short supply of housing, with an ever-increasing premium as workers are sourced from other regions to work on infrastructure projects. Securing accommodation for workers has an impact on small regional towns and their capacity to service local and tourism markets, as well as any existing seasonal workforce. Work camps are often not looked favourably upon in some local communities but may be necessary to house workers across such projects.

## **Shortage of apprentices**

The lack of apprentices to fill available positions is already having an impact across the region, with a combined effect of increasing demand for apprentices plus a shortfall of those that are apprenticeship ready. ABS data shows that there is a lower proportion of people holding formal qualifications in the region (including vocational qualifications) and a higher proportion of people with no formal qualifications, compared to NSW.

Across the region, employment and training organisations are consistently reporting that there is simply not the workforce available to meet demand for apprentices, with one large training provider reporting that an advertisement for local apprenticeship that would have received more than fifty applicants little over a year ago is now lucky to attract five or six applicants, with many of them not appropriately qualified or work ready.

## 3. WORKFORCE OVERVIEW

Construction of the Project is anticipated to take approximately 24 months from the commencement of site establishment works, with a peak construction period of approximately 8-12 months.

It is anticipated that construction will commence in Q2 2024, preceded by a few months of early works. The overall duration of the Project's construction will be confirmed once the preferred EPC contractor is selected, and the detailed construction schedule is confirmed.

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

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

### 3.1 Workforce estimates

#### 3.1.1 Construction

Early works are anticipated to start in Q4 2023 and continue through Q1 2024. The early works phase includes preparatory works which must occur prior to the commencement of main construction activities. Work will mostly be undertaken by contractors or specialists. Activities in this phase include:

- Road upgrades required under Condition 6 of Schedule 3.
- Establishment of a vegetation buffer.
- Road dilapidation surveys for Benambra Road and Weeamera Road.
- Heritage salvage in accordance with the Heritage Management Plan.
- Geotechnical surveying.
- Installation of security fencing.
- Installation of safety markers along overhead powerlines.

Main works are currently scheduled to start at the end of Q1/beginning of Q2 in 2024, and the main works construction period will last for 18-21 months. The development will generate around 400 direct full-time equivalent (FTE) jobs during construction, with a maximum of 350 workers at any one time.

The main construction activities will include:

- Site establishment and enabling works including ground preparation, construction of the internal access tracks, preliminary civil works and drainage works.
- Installation of steel post and framing system for the solar panels.
- 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.
- Removal of temporary construction facilities and rehabilitation of disturbed areas.

Key jobs during construction will include operators, project managers, mechanical management, labourers, installation experts and technicians. It is anticipated that construction employment numbers will peak in mid-2025 with up to 350 personnel required on site, with numbers then progressively declining to 20 in November 2025 (Figure 3-1).



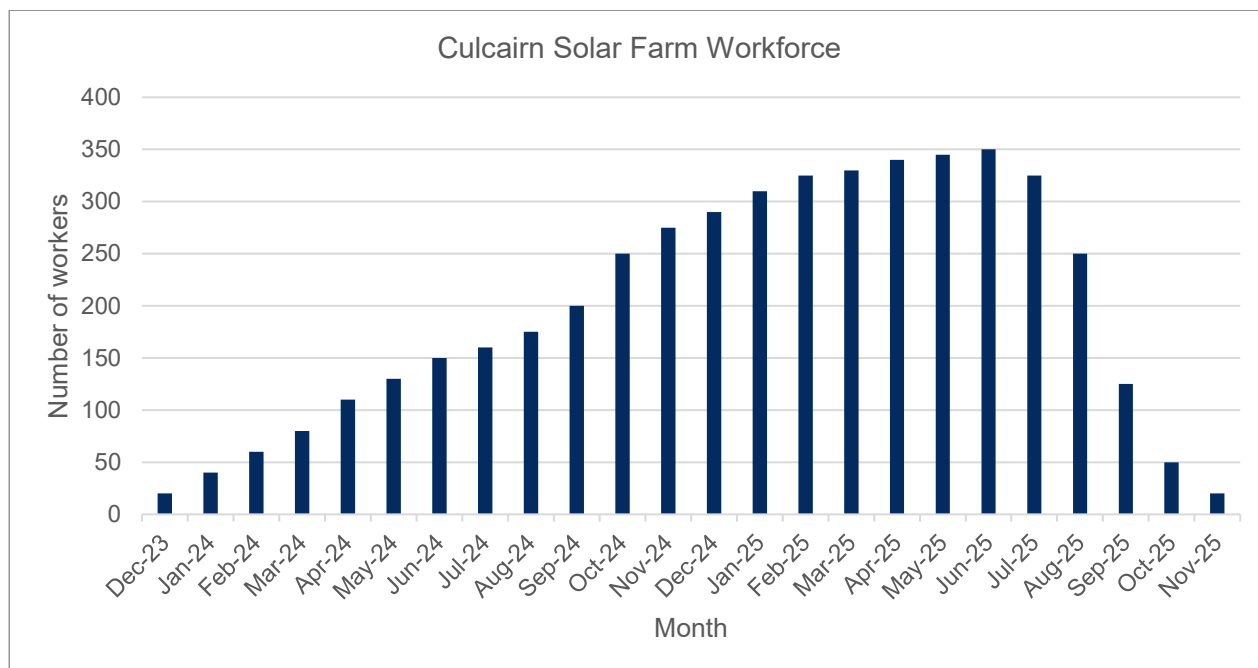


Figure 3-1 Estimated construction workforce numbers

(Source: Neoen, 2023)

### 3.1.2 Operation

The expected operational life of the Project is approximately 30 years. The key activities that would be undertaken during operation include:

- Routine visual inspections, general maintenance and cleaning operations of the solar arrays as required and the substation.
- Vegetation management (in accordance with the Bushfire Management Plan and Groundcover Management Plan), likely using sheep to control grass growth beneath the panels.
- Site security and operational response.
- Replacement of equipment and infrastructure.
- Maintenance of landscaping and screening plantings.
- Pest plant and animal control as required.

The Project will have approximately 5-10 FTE staff during the operation phase.

### 3.1.3 Decommissioning

At the end of its operational life, the Project infrastructure will be decommissioned, and the solar farm footprint returned to its pre-existing land use or another land use as agreed by the Project owner and the landholder at that time. Project decommissioning will require disturbance of the development footprint during the removal of equipment. Materials will be sorted and packaged for removal from the site for recycling or reuse wherever possible. A significant number of FTEs, including both staff and contractors, will be required during the decommissioning phase.

### 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

Consent Condition 33(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 of nearby major projects overlap with the construction period of the current Project. 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.

In contrast, 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.

As noted in Section 2.5, the Riverina Murray region is experiencing a significant increase in economic activity driven by a pipeline of infrastructure projects. Several major projects have been identified as being in proximity to the Project and therefore of relevance from an employment and accommodation availability perspective (Table 3-1).

Two projects are highly likely to have concurrent demand for workers, accommodation, and services. The 330MW Walla Walla Solar Farm is located approximately 1km south of the Project site. SSD approval was granted in 2020. The solar farm is currently under construction, which is anticipated to be completed in Q2 2024. As such, it is likely that there will be some overlap in the non-peak workforce construction phases for both projects in the first half of 2024, which may result in competition for and impacts on accommodation, services, and workers.

The 120MW Jindera Solar Farm is located approximately 28km south of the Project site. SSD approval was granted in 2020; Modification 1 is under assessment at the time of writing. This solar farm will provide approximately 200 FTE direct jobs during construction. This project anticipates a similar timeframe for construction, and may compete for accommodation, services, and workers with this Project's construction workforce.

Other projects in the broader region that may have possible concurrent demand, particularly for accommodation, include the Inland Rail – Albury to Illabo development; the Riverina Redevelopment Program – Defence Estates (Albury Wodonga and Wagga Wagga); and Albury Wodonga Regional Hospital project.

Table 3-1 Potential concurrent demand

Name	Location	Status (Sept 2023)	Development timeline (indicative only)	Potential concurrent demand
Walla Walla Solar Farm 330MW	1km south ~4km northeast of Walla Walla	Approved December 2020	Under construction; anticipated completion Q2 2024	Likely ~250 FTE construction ~16 FTE operations
Jindera Solar Farm 120MW	28km south ~4km north of Jindera	Approved December 2020 Mod 1 - Assessment	Pre-construction; construction 15 months from late Q2 2024 – late Q3 2025	Likely ~200 FTE construction ~ xx FTE operations
Glenellen Solar Farm 200MW	30km south ~2km north of Jindera	Assessment – Request for information July 2023	Planning; construction 18-24 months, timeline unknown	Possible ~200 FTE construction ~xx FTE operations
Gregadoo Solar Farm 65MW	62km northeast ~13km southeast of Wagga Wagga CBD	Approved December 2018 Mod 2 approved March 2021 Mod 3 approved August 2023	Pre-construction; construction 12 months from late Q1 2024 – late Q1 2025	Possible ~100-150 FTE construction ~2-3 FTE operations
Maxwell Downs Solar Farm 104MW	52km northeast ~14km south of Wagga Wagga	Prepare EIS	Planning; construction 12-18 months, timeline unknown	Unlikely 300-350 FTE construction ~8-12 FTE operations
Inland Rail – Albury to Illabo	Multiple, incl. Albury, Culcairn, Wagga Wagga	Response to submissions	Planning; construction over 16 months starting 2024	Possible 770 FTE construction
Albury Wodonga Regional Hospital project	Albury	Planning phase	Planning; anticipated construction timeline Q3/4 2024-Q4 2027	Likely ~1,000 FTE construction
The Riverina Redevelopment Program – Defence Estates	Albury Wodonga Military Area; RAAF Base Wagga	Planning phase scheduled to be completed late 2023	Planning; anticipated timeline Q1 2024 – Q4 2028	Likely FTE unknown
Humelink	Multiple incl. Wagga Wagga LGA	Response to submissions	Planning; construction over 30 months starting mid 2024	Possible 1,200 FTE construction
EnergyConnect (NSW – Eastern Section)	Multiple incl. Wagga Wagga LGA	Approved September 2022	Under construction; anticipated completion Q4 2024	Unlikely ~1,500 FTE construction

## 4. INDUSTRY & ABORIGINAL PARTICIPATION PLAN

### 4.1 Our approach

Neoen seeks to develop and nurture local and social procurement initiatives, partnerships and innovation with the confidence that we will be there to see projects through from early development to the final stages of operations across the years to come.

Key elements of Culcairn Solar Farm's delivery will be contracted out to an EPC contractor and the operation of the solar farm to O&M contractors. The EPC contract will present approximately \$550 million of project expenditure and in the case of O&M, provide a contract of around \$100 million over a period of 25 years. The value of these contracts provides Neoen with significant buying power to influence the approach and practices of its successful EPC and O&M partners. While value for money is a primary consideration, Neoen will also look to include and assess against our IAPP targets as specific deliverables in the tendering process.

The commitments made within the IAPP and wider AES will be written into the EPC and O&M contracts. Neoen's construction project manager will be responsible for overseeing the main contractor to ensure the contractor delivers on the outcomes during the period of their contracts.

The objectives in relation to enhancing local and regional economies include:

- Fostering local community support for investment in new energy storage and network infrastructure.
- Supporting economic development and manufacturing.
- Creating employment, including employment for Aboriginal and Torres Strait Islander people.
- Investing in education and training.
- Leaving legacy items in the community post construction.
- Promoting local industry, manufacturing, and jobs.

### 4.2 Neoen Policies & Practice

The following Neoen policies specifically advance the promotion, integration, and adoption of IAPP procurement practices into the operation of the business:

#### 4.2.1 Sustainability Framework

In March 2021 Neoen launched its global Sustainability Framework (Appendix A), a roadmap outlining the company's approach and commitments to scale up its broader contribution towards meeting the United Nations Sustainable Development Goals. The Sustainability Framework drives more ambitious and wide-ranging outcomes as Neoen strive to deliver excellence in sustainability, beyond their core business of clean energy generation.

#### 4.2.2 Indigenous Participation

Neoen has developed principles to guide First Nations engagement on their projects, which seek to:

- Identify and acknowledge all relevant affected Indigenous peoples and communities.
- Demonstrate cultural awareness & sensitivity.
- Build trust and enduring partnerships.
- Ensure consultation and engagement process is informed by Indigenous peoples and communities.

Neoen Australia's first Reconciliation Action Plan (RAP) – REFLECT – has recently been launched and the company has an internal RAP Working Group. This signals the start of the organisation's formal journey towards, and commitment to, reconciliation.

## 4.2.3 Indigenous Participation Plan

Neoen Australia has an established approach for maximising First Nations participation and providing local Indigenous businesses and jobseekers full, fair, and reasonable opportunity to participate. Under this framework, several Neoen projects are currently delivering positive First Nations participation and benefit-sharing outcomes. These learnings are a part of the internal culture and provide a foundation for the development of the IAPP.

## 4.2.4 Local Participation Plan

Neoen has established an approach for maximising local industry participation and providing local jobseekers and business/industry with full, fair, and reasonable opportunities to participate.

Project teams are well versed in the following practices to ensure procurement activities are not solely focused on price, but encompass opportunities to deliver social and sustainable outcomes:

- Involving the EPC and O&M contractors in the setting of targets during the 'request for proposal' RFP stage.
- Ensuring that at the subcontractor tender preparation stage, tenders are packaged in a manner that optimises local and social procurement opportunities while enhancing competitiveness and value for money.
- Undertaking a local procurement analysis and actively networking to identify potential partners, social enterprises and initiatives using the services of local content specialists with knowledge of diverse or underrepresented labour options and supporting their use by contractors and sub-contractors.
- Holding public briefings which will provide timely information to regional businesses, industry and social enterprises on the jobs, services, supplies and support requirements of the Project.
- Cooperating and collaborating with regional economic development bodies to deliver benefit.
- Building the capacity of internal and external workforces to identify, shape and deliver local and social procurement outcomes.
- A culture of lesson sharing, and continuous monitoring and improvement.

## 4.2.5 Community Communication Strategy

Neoen has an established approach for community engagement, with a record of extensive community engagement during the development of the Culcairn Solar Farm, outlined in the Culcairn Solar Farm Community Communication Strategy (CCS).

The following plan builds on the work undertaken by Neoen in the early stages of project development. Figure 4-1 below highlights how the IAPP aligns with different project stages.

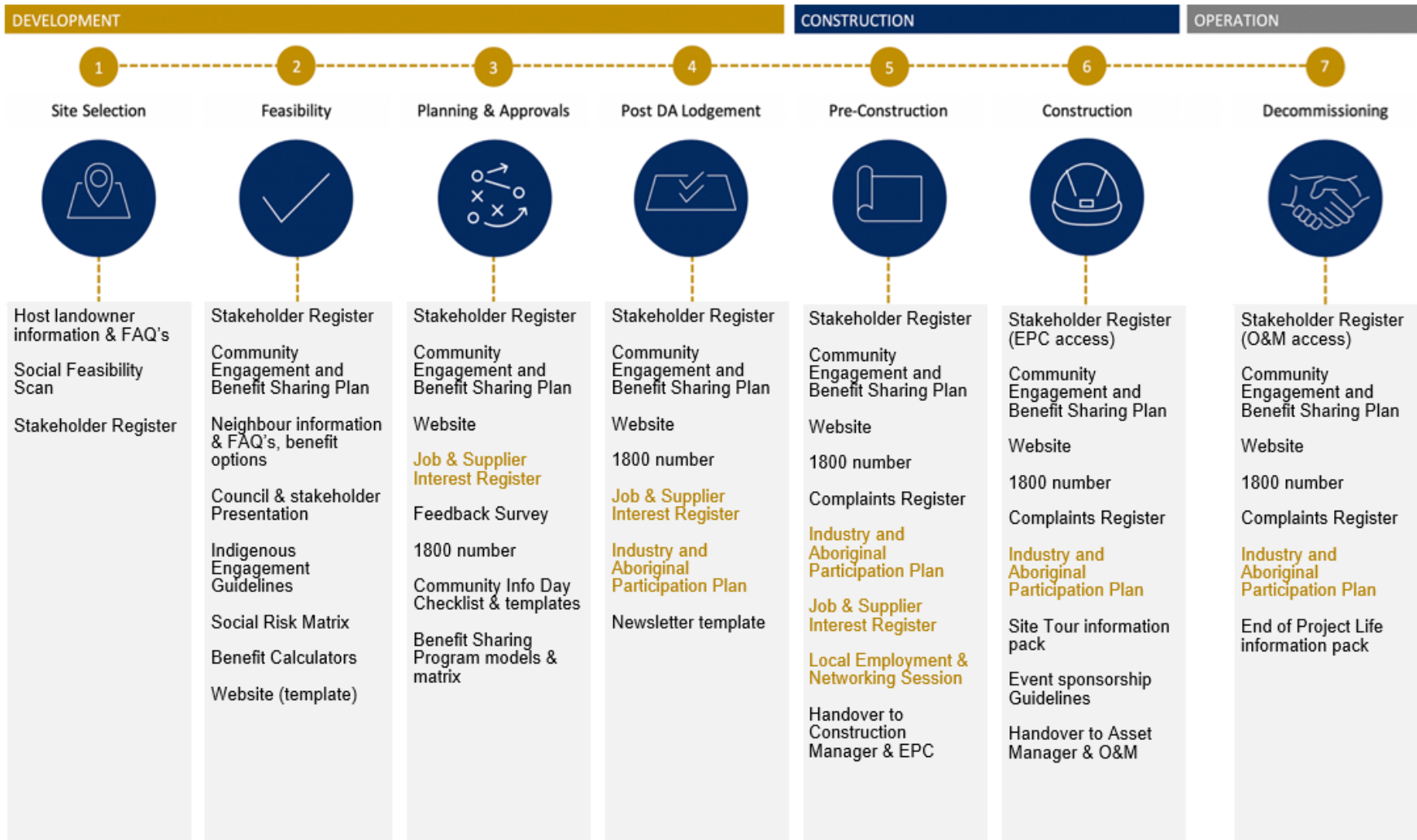


Figure 4-1 Industry and Aboriginal Participation activities by Project stage

## 4.3 Roles and responsibilities

Table 4-1 outlines the Neoen personnel responsible for the design, delivery, and evaluation of the Project's AES, including the IAPP. These roles and responsibilities, and those of the EPC, are described in more detail in the EMS.

*Table 4-1 AES roles and responsibilities*

Role	Responsibility
Project Manager	Designates appropriate, sustainable, and strategic AES objectives for delivery in construction and operational phases of the Project. Monitor EPC Participation Manager on implementation of AES activities and targets. Liaison with Greater Hume Council. Reporting of AES outcomes to NSW Government and other stakeholders.
Neoen Owner's Engineer	Monitor EPC Participation Manager on implementation of AES activities and targets on site. Liaison with Greater Hume Shire and accommodation providers Reporting of AES outcomes to Neoen Project Manager
Neoen Head of Engagement	Ensure IAPP strategically aligns with Corporate Policies and Practices. Build internal capacity for delivery of best practice social procurement practices and outcomes, including lesson sharing across portfolio. Leverage IAPP to promote Neoen social procurement capabilities to internal and external stakeholders for long-term reputational gain.
Community Relations Adviser	Facilitates the strong, working relationships with local content specialists and social procurement agencies for the purposes of establishing and implementing industry & Aboriginal participation outcomes. Liaison with Community Liaison Officer and handover of networks, relationships and initiatives.
Community Liaison Officer	Responsible for AES implementation during construction and operations Liaison with local and First Nations networks & suppliers. Identifying opportunities and ensuring buy-in through the tiers of subcontractors. Monitoring, tracking and reporting of IAPP outcomes against targets to Neoen. Liaison with Greater Hume Council and accommodation providers.
EPC Project Manager	Support implementation of AES activities and targets on site. Liaison with Greater Hume Shire and accommodation providers Reporting of AES outcomes to Neoen Owner's Engineer and Neoen Project Manager
EPC HSE Supervisor / Coordinator	Ensure implementation of AES activities and targets on site. Liaison with Greater Hume Shire and accommodation providers. Reporting of AES outcomes to Neoen Owner's Engineer and Neoen Project Manager.



## 5. IAPP – EMPLOYMENT STRATEGY

### 5.1 Scope

In planning its IAPP approach for the Culcairn Solar Farm, Neoen has considered the following critical project parameters, as outlined in Table 5-1.

*Table 5-1 Critical project parameters*

Parameters	Review																					
Social Risk	<p>Neoen will identify the potential social risks, impacts and benefits to local communities and identified social groups arising from the construction and operation of the Culcairn Solar Farm. A social baseline understanding of the local community will be developed – to best understand where disadvantage is experienced within the community and where social socio-economic challenges exist (refer Section 2).</p> <p>The Project presents opportunities for positive social impacts, primarily in relation to direct and indirect employment, business procurement opportunities, training and career pathway development, and social investment opportunities through the Community Benefit Scheme in the local and regional area. As part of a new industry, the Project also has genuine potential to encourage the mobilisation and development of new skills and trades – with the potential to provide benefit to the renewables sector industry as it continues to evolve. In this local industry and First Nations participation and procurement offers a tangible means of enhancing the skills and capacities of the economy in general – and of disadvantaged and socially vulnerable groups.</p>																					
NSW Industry & Aboriginal Participation Objectives	<table border="1"> <thead> <tr> <th>Employment, skills and knowledge transfer criteria</th> <th>Baseline requirements</th> <th>Stretch goal</th> </tr> </thead> <tbody> <tr> <td>Learning workers (% of total Project workforce)</td> <td>20%</td> <td>40%</td> </tr> <tr> <td>Apprentices (% of all trade positions on a Project)</td> <td>20%</td> <td>30%</td> </tr> <tr> <td colspan="3">First Nations participation criteria</td> </tr> <tr> <td>First Nations participation</td> <td>1.5%</td> <td>10%, or the goal in the region-specific protocol under the First Nations Guidelines.</td> </tr> <tr> <td colspan="3">Fair and ethical practice criteria</td> </tr> <tr> <td>Employment of underrepresented groups</td> <td>15%</td> <td>25%</td> </tr> </tbody> </table>	Employment, skills and knowledge transfer criteria	Baseline requirements	Stretch goal	Learning workers (% of total Project workforce)	20%	40%	Apprentices (% of all trade positions on a Project)	20%	30%	First Nations participation criteria			First Nations participation	1.5%	10%, or the goal in the region-specific protocol under the First Nations Guidelines.	Fair and ethical practice criteria			Employment of underrepresented groups	15%	25%
Employment, skills and knowledge transfer criteria	Baseline requirements	Stretch goal																				
Learning workers (% of total Project workforce)	20%	40%																				
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Employment of underrepresented groups	15%	25%																				
Resourcing, budget and timeframes	<p>Neoen’s capacity to deliver conceptual IAPP objectives will be evaluated to ensure established targets and measures can be successfully met – from both a commercial and contractual perspective.</p> <p>The IAPP criteria will be introduced at the outset of the EPC tendering process, ensuring good buy-in and consultation around requirements, resourcing and development of targets.</p> <p>Neoen will undertake extensive background networking and relationship development to identify local needs, initiatives, partnerships, and opportunities, and to ensure the targets are both achievable and include stretch goals.</p> <p>Neoen will appoint a part-time Community Liaison Officer to develop and deliver the outcomes and drive compliance throughout the project, including the subcontractor chain. This will ensure proposed measures are actionable, achievable and will deliver the intended outcomes.</p>																					

## 5.2 Regional Collaboration

The foundation of the IAPP is a commitment to build constructive relationships with First Nations and Industry partners to understand both local and regional opportunities, and constraints. A comprehensive delivery plan sits behind the IAPP that identifies regional partners with whom Neoen will need to work, to deliver on participation targets.

Neoen’s engagement process for the development of the IAPP has indicated growing support for collaboration across the region, with many local partners expressing a strong commitment to work together with other First Nations and Industry partners, to deliver the best outcomes for First Nations communities.

Organisations directly consulted in the development of this IAPP are included in Appendix B. This stakeholder list is expected to expand as the project is implemented.

## 5.3 Development criteria

Neoen will be responsible for the delivery of local participation and social procurement initiatives that address the four social and sustainable improvement priorities of the IAPP. Table 5-2 outlines the broad Development Criteria, with the specific baseline targets and stretch goals outlined in each section.

*Table 5-2 Criteria for Regional Economic Development*

Regional Economic Development	
1	Opportunities to supply goods and services, local content commitments, local supply chain investment and innovation commitments and supporting strategies and actions
2	Employment and workforce development commitments and supporting strategies and actions
3	First Nations Participation
4	Commitments towards environmentally sustainable procurement throughout the supply chain

To meet the baseline targets and work towards the stretch goals identified, the following priorities have been identified within the NSW Renewable Energy Sector Board’s Plan.

- Investment and innovation in the local supply chain in the NSW renewable energy sector including R&D related to challenges faced by the Project and its associated technology and start-ups and social enterprises related to renewable energy.
- Community development that involves innovative training and employment initiatives or programs that reach underrepresented groups such as women, long-term unemployed and Aboriginal people, and includes appropriate strategies and actions such as pre-employment training, scholarships, cross-skilling to renewables and supporting apprentices.
- Involving First Nations communities through innovative products, processes, technologies, and services across the development, construction and operations phases of the project that have wider applicability in the sector.

### 5.3.1 Community Liaison Officer

Given the scale of delivery and commitments involved with the IAPP, Neoen has resourced a part-time position to support its implementation, as well as providing a resource to support improvement in participation across the broader region in the renewables sector.

Neoen has a strong track record of facilitating innovative approaches to its projects, with a wide range of stakeholders including First Nations, community organisations and industry partners. There is considerable capacity in this region among established and emerging First Nations businesses and other industry partners who are committed to working together in new and innovative ways to deliver practical long-term outcomes for First Nations and other under-represented groups.

As part of the IAPP for Culcairn Solar Farm, Neoen has engaged a part-time Community Liaison Officer for pre-construction through the construction phases.

The key tasks/activities (or KPI's) for this role will include:

- Improve local workforce participation and pathways in the large-scale renewables sector.
- Work with other renewables developers to support local participation and promote collaboration within the sector.
- Communicate regional opportunities with the Project community to facilitate the engagement and involvement of local and regional workers and suppliers.

## 5.3.2 Local supply chain development and inputs

As a long-term owner and operator of the Culcairn Solar Farm, Neoen are committed to investment in local employment and supply chain outcomes, which will bring long-term economic and capacity-building benefits for the region.

### Context

Since the Culcairn Solar Farm was approved in 2021, Neoen have continued to work with local businesses and industry in the region, establishing a Business Register that contains well over 100 local businesses, subcontractors and labourers interested in work opportunities on the project. Neoen's Project Manager and Community Liaison Officer will coordinate with the selected EPCs to organise Local Employment and Supplier community days at the start of construction. The companies and individuals that have registered their interest in the project will be invited to these sessions, where available work packages would be presented. Action items and outcomes are detailed further in Table 5-4.

While the NSW Renewable Energy Sector Board's Plan minimum local content requirements apply only to Australia and New Zealand, with no specific requirements for local or regional content, Neoen will apply its own local participation framework to ensure there is a focus on maximising benefits for those in closest proximity to the Project. Based on our experience this represents the most significant opportunity for the project to affect real and sustained change with respect to workforce participation.

The first three tiers relate to Neoen's preference for local, regional and state opportunities, with the fourth tier applying to the broader context of meeting the NSW Renewable Energy Sector Board's Plan requirements.

- **Tier 1: Immediate locality**- including the Greater Hume Shire, specifically the localities of Walla Walla and Culcairn and the surrounding smaller towns and settlements.
- **Tier 2: Region** – referring to the Murray Region, which covers ten local government areas (LGAs) including Greater Hume Shire Council and Albury City Council.
- **Tier 3: State** – which refers to the entire state of NSW, acknowledging that Albury-Wodonga is a cross border town and that some initiatives will incorporate the Victorian side of the border.
- **Tier 4: Australia and New Zealand** – the minimum requirements apply to local content from Australia and New Zealand, except for First Nations participation. The First Nations requirements apply to Australia, with emphasis on opportunities for local communities (NSW Renewable Energy Sector Board requirement).

### Outcomes sought:

- Identify opportunities for local supply chain inputs.
- Integration of local businesses into renewable energy supply chain.
- Local and regional employment.

## 5.3.3 Employment and workforce development

From experience on other projects, Neoen understand that employment and workforce development is more than simply offering opportunities to under-represented groups. It is about implementing strategies that give people the best chance of success, by providing support and guidance to overcome barriers they may face.

### Context

As outlined in Section 2, despite the Riverina Murray Region experiencing unprecedented investment in major infrastructure projects, many employers are finding it difficult to fill new and existing jobs with appropriately skilled employees, with many experiencing long-term job vacancies.

During the development of the IAPP Neoen have identified key stakeholders, including TAFES, Universities, Aboriginal organisations and businesses, RTOs, recruitment, and employment agencies to afford a collective approach to facilitating participation and employment across the region and enable baseline targets to be reached.

It is expected that apprenticeship targets will largely be met through subcontractors responding to the increased work opportunities in the region over the next few years, within workforce constraints. Neoen's Numurkah Solar Farm (operating since 2019) provides a good example of how participation targets can be supported by subcontractors, with Watters Watters Electrical engaging 11 first year Apprentices (of a total of 120 local workers) and Rich River Piling taking on 12 additional trades assistants (in addition to 12 local staff).

### Outcomes sought

- Job readiness and employment for Apprentices and Learning Workers
- Opportunities for underrepresented groups which may include:
  - o Women in trades and construction.
  - o Long-term unemployed people, including older persons or those with disability.
  - o Underemployed people.
  - o Disengaged youth.
  - o Migrants and refugees.
  - o Ex-offenders in transition.

### Discussion of Neoen commitment

While the NSW Renewable Energy Sector Board's Plan baseline requirement is 20% respectively for learning workers and apprentices, Neoen will be considering the overall baseline, with commitment to Learning workers, Apprentices and Underrepresented groups set at 15%, 10% and 5% respectively. This is in response to the consensus view from regional stakeholders that workforce capacity will be limited over the coming few years due to the pipeline of infrastructure projects.

With relationships already established with education and training organisations across the region, Neoen will be focused on developing partnerships with local services that can provide the wrap-around support that is essential to support underrepresented groups to access training and employment opportunities. This includes a need for Certificate II and II courses such as Business Administration, White Card (general construction) and for many young people facing disadvantage, support to obtain their driver's licence.

## 5.3.4 First Nations Participation

As required in the NSW Renewable Energy Sector Board's Plan, Neoen are committed to the baseline target of 1.5% First Nations participation across construction and operational phases of the project, with the intention of delivering the highest target possible.

As well as meeting the requirements of NSW Renewable Energy Sector Board's Plan, we have also drawn on the NSW Government's Electricity Infrastructure Roadmap, *First Nations Guidelines – Increasing income*

and employment opportunities from electricity infrastructure projects (OECC, 2022) to ensure First Nations communities have greater say in how they wish to be engaged, and the outcomes that are a priority for their area.

## Context

The Traditional Owners (TO's) of the land on which the Culcairn Solar Farm will be located are the Wiradjuri people. Wiradjuri Country is the land of the three rivers: the Wambool (Macquarie), the Kalare (Lachlan) and the Murrumbidgee. The Wiradjuri Nation is geographically the largest Indigenous Nation within NSW and among the largest in terms of population.

The boundary of the Wiradjuri Nation extends from Coonabarabran in the north, straddling the Great Dividing Range down to the Murray River and out to western NSW. Wiradjuri traditional country includes the townships of Dubbo, Condobolin, Orange, Bathurst, Wagga Wagga, Albury, Narrandera, and Griffith, all with large populations of Wiradjuri Traditional Owners. The Wiradjuri people are represented by the Wiradjuri Council of Elders and each community has established their own form of governance to represent local interests. The Wiradjuri Nation contains 21 land councils, including the Albury and District Local Aboriginal Land Council.

Table 5-3 provides a snapshot of the Wiradjuri and the local Aboriginal representatives and organisations identified to partner with Neoen to meet First Nations participation targets for the Culcairn Solar Farm. Further consultation will be required to identify all relevant First Nations groups and stakeholders, particularly as new individuals or organisations are identified.

*Table 5-3 Overview of First Nations context, representatives and organisations*

Overview	
Traditional Owners	Wiradjuri
Language	Wiradjuri
Approximate size	Estimated to cover approximately 97,100 square kilometres.
Location	Wiradjuri country is the largest in NSW, stretching from the eastern boundary of the Great Dividing Range. Drawing a line from the present towns of Hay and Nyngan approximates the western boundary. While Gunnedah and Albury mark the northern and southern boundaries of Wiradjuri country.
Local Representative Groups - Albury region	Albury & District Local Aboriginal Land Council (Albury LALC) * Mungabareena Aboriginal Corporation Riverina Murray Regional Alliance (RMRA).
Aboriginal Organisations - Albury region	Connexions TVN On-Country (Wodonga) On-Country Pathways (Wondonga) Ironbark Training Wamarra Education Services International (Wagga) Ngumbaay Indigenous Corporation (Wagga)

\*Prepared Cultural Heritage Management Plan for Culcairn Solar Farm

## Outcomes sought

- Establish an ongoing relationship with First Nations organisations and businesses
- Employment and training of First Nations people
- Purchasing from First Nations businesses
- Support of First Nations initiatives

On other projects, Neoen has delivered well above the First Nations baseline target established for the project.

Consistent with the workforce constraints already highlighted in Section 3, there is a clear message that pre-employment support is the area of greatest need and the area with the greatest potential to achieve practical outcomes for First Nations people.

All organisations consulted for the IAPP have reinforced the necessity of providing wrap-around services, which often include support with transport, driver licencing and life skills. All First Nations organisations emphasise that improving workforce participation will only result from a holistic approach to supporting long term employment.

## 5.4 Action plan and mitigation strategies

Neoen will provide pre-tender workshops for potential EPCs on Neoen's approach and expectations for social procurement. Prior to construction, Neoen will work with the EPC Contractor to implement the IAPP employment strategy, building on consultation undertaken to inform the action plan developed for the AES (see Appendix B). This will include re-establishing relationships with parties including education and training services and continuing to develop mutually beneficial relationships with First Nations organisations, networks, and businesses to identify joint initiatives that can support positive socioeconomic outcomes.

Outcomes in the Action Plan below (Table 5-4) correlate to the criteria presented previously in Table 5-2 and the outcomes in each of the sections above.

Table 5-4 Employment Strategy Action Plan

Project aspect	Measures	Responsible Party	Objective	Timing	Implementation Action	Compliance Record
Employment Strategy	Prepare an AES in accordance with Schedule 3, Condition 33	Neoen Project Manager		Prior to construction	This AES	This AES
Employment Strategy	Implement an AES in accordance with Schedule 3, Condition 33	Neoen Project Manager EPC Project Manager EPC HSE Supervisor/Coordinator All employees and contractors		Prior to construction; ongoing	This AES	This AES
Local employment and procurement	Establish an Expression of Interest (EOI) register for local businesses as well as those looking for individual employment.	Neoen Head of Community Engagement	Prioritise local content and opportunities for local businesses, services, and workers.	Prior to construction; ongoing	Update, promote and maintain existing Expression of Interest business register within the Project website.	Documentation of EOIs and proportion of EOIs resulting in employment or procurement opportunities.
Local employment and procurement	Partner with local organisations to communicate employment and procurement opportunities emerging from the Project.	Neoen Project Manager EPC Project Manager EPC HSE Supervisor/Coordinator	Prioritise local content and opportunities for local businesses, services, and workers.	Nearing construction; ongoing	Map work packages and supply chain opportunities and proactively identify local businesses with relevant capabilities.  Partner with ICN Gateway to communicate employment and procurement opportunities to local businesses and workers.  Collaborate with local organisations and social enterprises to identify priority jobseekers and opportunities for employing labour hire across work packages (e.g.,	Documentation of engagement with ICN and other organisations and involvement in events or online communication about local employment and procurement opportunities.



Project aspect	Measures	Responsible Party	Objective	Timing	Implementation Action	Compliance Record
					security, signage, site compound buildings, tree-planting and landscaping). Proactive identification of eligible First Nations organisations/social enterprises for active addition to the Project's Business and Stakeholder Registers.	
Local employment and procurement	Attend and host Local Employment and Supplier community days at the start of construction, where work packages would be presented.  Attend other local forums and events to maintain relationships with regional and local businesses and groups, such as those hosted by RDA Murray and Greater Hume Council.	Neoen Project Manager EPC Project Manager EPC HSE Supervisor/Coordinator	Prioritise local content and opportunities for local businesses, services, and workers.	Prior to construction; ongoing as necessary	Attend or host local employment and procurement information sessions.  Communicate Project timeline and work packages, invitations to attend community days to companies and individuals that have registered their interest in the Project.  Procure event and site catering requirements from local companies or social enterprises.	Documentation of events and register of expressions of interest collected at these events.
Local employment and procurement	Embed transparent selection criteria for subcontractors that prioritises organisations based in the GHS LGA (Tier 1), and Albury and Wagga Wagga LGAs and the broader Riverina Murray Region (Tier 2).  Target at least 10% of sub-contractors from these regions across the Project.	Neoen Project Manager EPC Project Manager	Prioritise local content and opportunities for local businesses, services, and workers.	Establish sub-contractor selection criteria from Project inception.  Throughout construction: Monthly review of workforce requirements and sub-contract requirements	Embed selection criteria with a weighting of at least 10% to prioritise sub-contractors that employ workers from Tier 1 (GHS LGA) or Tier 2 (Albury City and Wagga Wagga LGAs and the broader Riverina Murray Region).  Embed selection criteria with a weighting of at least 10% that employ sub-contractors	Maintain a register of employees and sub-contractors to report on a) the proportion of jobs filled by residents of Tier 1 and Tier 2 locations and b) proportion of sub-contractors appointed with businesses registered in the Tier 1 and Tier 2 locations.

Project aspect	Measures	Responsible Party	Objective	Timing	Implementation Action	Compliance Record
				against forecast need and targets outlined in this AES.	with businesses registered in Tier 1 or Tier 2 (as above).	
Local employment and skills development	Incentivise EPC and O&M contractors to support employment and training outcomes for apprentices, learning workers and underrepresented groups outcomes through targets and tracking.	Neoen Project Manager Neoen Community Liaison Officer EPC Project Manager	Prioritise local employment and skills development.	Monthly review of workforce requirements and sub-contract requirements against forecast need and targets outlined in this AES.	Embed targets in contracts for construction: - 15% learning workers - 10% apprentices - 5% underrepresented group employment Partner with local/regional employment agency to recruit jobseekers that face barriers and are from under-represented groups.	Maintain a register of employees and sub-contractors to report on the proportion of jobs filled by learning workers, apprentices and under-represented groups.
Local employment and skills development	Provide transport arrangements for members of underrepresented groups employed onsite to improve job capability and performance.	Neoen Community Liaison Officer EPC HSE Supervisor/Coordinator	Prioritise local employment and skills development.	Monthly review of employee transport requirements and shift timing.	Hire shuttle buses from local providers to transport workers from their accommodation to site.	Maintain a register of employees from underrepresented groups.
Local employment and skills development	Partnerships with organisations working with local school(s) to identify opportunities to support students to consider pathways into renewables, including site tours & career talks.	Neoen Community Liaison Officer EPC Project Manager EPC HSE Supervisor/Coordinator	Prioritise local employment and skills development.	Nearing construction - Initial meetings to establish partnerships. Ongoing through construction	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.
First Nations Participation	Establish processes and selection criteria that prioritise Indigenous employment and procurement.	Neoen Project Manager Neoen Community Liaison Officer	Prioritise First Nations participation	Pre-construction Throughout construction: Monthly review of workforce	Embed targets in contracts for construction of 1.5% First Nations workforce participation.	Maintain a register of employees and sub-contractors to report on the proportion subcontractors

Project aspect	Measures	Responsible Party	Objective	Timing	Implementation Action	Compliance Record
	<p>Partner with key First Nations regional partners to access specialised procurement sourcing panels with Certified and Registered First Nations businesses.</p> <p>Incentivise EPC and O&amp;M contractors to support genuine employment and training outcomes for First Nations.</p> <p>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 registered with Supply Nation.</p> <p>Partner with a local Aboriginal organisation/s to identify at least one Operational ongoing contract / work package that can be filled by a First Nations owned business registered with Supply Nation.</p>	EPC Project Manager		requirements and sub-contract requirements against forecast need and targets outlined in this AES.	<p>Review Traditional Owners Whole of Country Plans for specific guidance on targets and strategies where procurement by the Project can deliver measurable value.</p> <p>Embed selection criteria to prioritise sub-contractors that are Certified and Registered First Nation businesses, or are owned, managed, or staffed by First Nations people.</p> <p>Identify key representative First Nations regional partners. Re-establish and continue to develop mutually beneficial relationships with First Nations organisations, networks and businesses to identify joint initiatives that can support positive socioeconomic outcomes.</p> <p>Establish and maintain a register of local Certified and Registered First Nations businesses.</p>	demonstrating First Nations ownership or employment.
First Nations participation and skills development	Consider ancillary 'job readiness' training and awareness programs specifically suited to First Nations people to provide them with optimal opportunity to secure training and employment with the Project.	<p>Neoen Project Manager</p> <p>Neoen Community Liaison Officer</p> <p>EPC Project Manager</p>	Prioritise First Nations participation		<p>Partner with local/regional employment agency to recruit First Nations jobseekers that face barriers.</p> <p>Partner with Training Providers to deliver specific pre-employment training to</p>	

Project aspect	Measures	Responsible Party	Objective	Timing	Implementation Action	Compliance Record
	Consider secondment opportunities where capacity is a challenge.				prepare Aboriginal job seekers for construction/operational roles.	
First Nations Participation	Development of a Welcome to Country video for site inductions which celebrates the Traditional Owners and brings to life their land and connection to country.	Neoen Community Liaison Officer	Prioritise First Nations Participation	Pre-construction; ongoing as necessary	Partner with Traditional Owners to develop a Welcome to Country video for site inductions.	Production of a Welcome to Country video.

## 6. ACCOMMODATION STRATEGY

### 6.1 Scope

This strategy builds on recommendations of the Culcairn Solar Farm Economic Impact Assessment (2019). Based on the updated workforce estimates in Section 3:

- A maximum on-site workforce at any time is anticipated to peak at 350 workers, and that sourcing at least 10% of the labour force from the locality has been deemed feasible.
- A maximum of approximately 300 accommodation beds would be necessary during the peak of construction.

The strategy identifies accommodation options within a 60-minute drive of the development (Table 6-1).

*Table 6-1 Accommodation options proximal to the Project*

Tier	Distance from the Project	Location
1	Within a 30-minute drive	Culcairn, approximately 5-minute drive northeast Walla Walla, approximately 10-minute drive south Henty, approximately 20-minute drive northeast Jindera, approximately 30-minute drive southwest Holbrook, approximately 30-minute drive east
2	Between 30- and 60-minute drive	Albury, approximately 40-minute drive south Wodonga, approximately 45-minute drive south Wagga Wagga, approximately 60-minute drive northeast

### 6.2 Stakeholder consultation

#### 6.2.1 Greater Hume Council

The General Manager, the Director of Environment and Planning, and Governance, Tourism and Communications staff at Greater Hume Council were consulted during the development of the Accommodation Strategy between May to June 2023, and again in September 2023 (details provided in Appendix D). Feedback received from Council that has been considered in the development of this strategy includes the following points:

- Limited economic development options exist in the region and the Culcairn Solar Farm was considered by Council to be an important project to generate employment, income, and jobs for the region.
- There was a great interest by local suppliers to benefit financially from the project, where possible. Existing accommodation suppliers, services and catering are available in the region.
- A preference for the construction workers that are likely to be engaged for the entire construction phase to be housed locally, i.e., in leased rental accommodation. This must be done in a socially responsible way (i.e., not offering above market rents to secure properties) to avoid pushing up rents and impacting on residents.
- Limited data exists about current short-term accommodation occupancy rates within the local area.
- Albury and Wodonga offer a larger range of short-term accommodation options that are frequently used for large projects. Much of this accommodation is underutilised, particularly around Lavington since the bypass was completed. Transportation and worker down time would be a consideration if these two locations were pursued.

- Semi-permanent dwellings were not a preferred option in the area due to the perceived poor facilities and uncertainty about what would happen to the dwellings post-construction phase, as well as a lack of suitable sites. Given potential cumulative impacts on local short-term accommodation, the Walla Walla campground was identified as a potential site for housing temporary cabins.
- Council would be open to working with Neoen and other interested stakeholders to consider the development of higher-quality permanent worker accommodation, such as manufactured houses grouped in a workers' village, that is suitably sited in or near townships such as Culcairn, Walla Walla, and Jindera. Such accommodation would be a Project legacy that could be repurposed for other housing needs once construction is completed.

## 6.2.2 Albury City Council

Consultation with the Tourism and Economic Development Units at Albury City Council was undertaken in September 2023. The aim was to inform the Council of the Project and identify the likelihoods of impacts, particularly cumulative, on short-term accommodation and rental housing in Albury-Wodonga and understand whether there have been any impacts related to the Walla Walla Solar Farm construction workforce. Feedback provided included:

- Occupancy rates, peak times, and key events, with the key event season in April-May.
- The city has a large range of accommodation options; however, the rental market is very tight, and people are finding it difficult to secure rental properties, particularly younger people without a rental record.
- The city experienced pressure on the local housing market during and post the Covid-19 pandemic and some vulnerable populations unable to secure rental properties have been residing in short-term accommodation. The number of people in this situation is slowly decreasing as other options become available.
- No impacts on short-term accommodation have been reported in relation to current projects, such as Walla Walla Solar Farm construction.
- Two key infrastructure projects in the Albury City LGA (Albury Wodonga Military Area redevelopment and the Albury Wodonga Hospital redevelopment project) are likely to have large construction workforces and timelines that will overlap with the construction timeline for this Project. Cumulative pressures on both the rental market and short-term accommodation are a cause for concern, particularly in 2025.
- The Albury City LGA is small with little land available for the development of worker accommodation facilities, either temporary or more permanent to be repurposed as a legacy.

## 6.3 Review of options

### 6.3.1 Workers' temporary accommodation

This category includes onsite or offsite accommodation utilising temporary or demountable accommodation. To date, this has not been commonly used in Culcairn and surrounding areas, as there has been no identified need for this type of accommodation. As noted above, the development of offsite temporary accommodation would be constrained by a lack of suitable site options. Developing more permanent worker accommodation that can become a legacy for the local community post-construction would be preferable.

However, given the potential for cumulative impacts described in Section 3.2, it may be necessary to consider temporary accommodation options in consultation with Greater Hume Council.

### 6.3.2 Short-term accommodation

Several hotels, motels and caravan parks are located within towns in the GHS as well as in Albury, Wodonga, and Wagga Wagga. Discussions with the Greater Hume Council identified a lack of available data, however, occupancy rates of short-term accommodation in Culcairn and Holbrook could be estimated conservatively at approximately 60% and at times 80-90%.

Peak occupancy periods typically occur during school holidays and local and regional events such as the Henty Machinery Field Days, held annually in mid-September and attended by more than 60,000 people. Council advised that during this three-day event, accommodation is booked out between Albury and Wagga Wagga. Other annual events in the Greater Hume region which may increase demand for accommodation and services in proximity to the Project include:

- Henty Agricultural Show (February)
- Holbrook Agricultural Show (March)
- Holbrook Easter Fly-In
- Holbrook Sheep and Wool Fair (May)
- Henty Machinery Field Days (major three-day agricultural event) (September)
- Culcairn Agricultural Show (September/October)

Albury-Wodonga's peak event season is March-April. Key events that can attract up to 8,000 people include:

- March: Albury Gold Cup racing carnival; Gardenesque; Albury Caravan Camping Show; Chryslers in the Murray
- April: Red Hot Summer Tour; National Dragonboat Championships

Albury City Council tourism staff noted that during the down season over winter, many short-term accommodation providers may offer options for longer stays but are often at 100% capacity over the summer holidays. This is particularly the case for caravan parks that offer self-contained accommodation, and vacancies over the summer period are more likely to be in motels.

Neoen maintains an internal working register of companies and accommodation providers, and local businesses can register an interest to service the project via the Project website. Twenty-nine accommodation providers have registered as potential suppliers to the Project (2020 data), equating to approximately 688 rooms within an hour's drive of the Project, with 148 of these rooms located in Culcairn, Holbrook, Jindera, and Walla Walla (Table 6-2). Based on this review, there would be limited short-term accommodation options outside the larger centres of Albury-Wodonga and Wagga Wagga. Assuming a 60% occupancy rate for the 13 providers in Culcairn, Holbrook, Walla Walla and Jindera, there would only be approximately 59 rooms available.

These providers are a sub-sample of the accommodation options available across the broader region. Albury-Wodonga has over 60 accommodation options providing 4,000 beds, while Wagga Wagga has over 25 options, including motels, hotels, units, holiday, and caravan parks. Additionally, there are approximately 80 Airbnb listings within the GHS LGA, and over 800 in Albury-Wodonga, including homes, apartments, cabins, farm stays and rooms, with some available for monthly rental (Airbnb, 2023).

*Table 6-2 Accommodation providers who have registered interest with the Project*

Location	No. of providers	Approx no. of rooms	Motel/Hotel	Caravan/ Tourist Park	Premises with meals
Culcairn	5	31	4	1*	3
Henty	1	11	1	0	1
Holbrook	6	110	5	1*	1
Jindera	1	4	1	0	1
Walla Walla	1	3	1	0	1
Woomargama	1	9	1	0	1
<b>Tier One Total</b>	<b>15</b>	<b>168</b>	<b>13</b>	<b>2</b>	<b>8</b>
Albury	7	287	7	0	3
Lavington (near Albury)	5	105	3	2*	2



Location	No. of providers	Approx no. of rooms	Motel/Hotel	Caravan/ Tourist Park	Premises with meals
Wagga Wagga	3	128	2	1*	4
<b>Tier Two total</b>	15	520	12	3	9
<b>Total</b>	29	688	29	5	16

\* Provides rooms, cabins and/or camping.

### 6.3.3 Rental or purchased accommodation

There are high rates of home ownership in the smaller towns in proximity to the Project, with separate houses 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 the larger regional centres of Albury-Wodonga and Wagga Wagga offer a wider variety of dwellings and larger rental markets, vacancy rates have generally been below 1.5% since mid-2020, indicating very tight rental conditions. The number of rental properties and the corresponding vacancy rate in August 2023 are presented in Table 6-3 below.

There has also been upward pressure on rents over the past several years. In the GHS LGA, the median weekly rent for the June 2023 quarter was \$378, slightly lower than in the Albury LGA (\$400) and the Wagga Wagga LGA (\$430). This represents an annual increase of 10-11% in each of the LGAs (DCJ, 2023).

*Table 6-3 Rental vacancy numbers and rates, August 2023*

Location	Postcode	Number of rental vacancies	Rental vacancy rate
Culcairn	2660	2	2.0%
Walla Walla	2659	0	0%
Holbrook	2644	2	1.1%
Jindera	2642	2	0.7%
Albury	2640	54	1.0%
Wagga Wagga	2650	54	0.7%

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

The analysis of available properties for sale near the Project and within the major centre of Albury suggests that longer term accommodation options remain limited. The following information was retrieved from [www.realestate.com.au](http://www.realestate.com.au) on 7 June 2023.

#### **Culcairn**

- The median property price in Culcairn between June 2022 to May 2023 was \$300,000 based on 22 house sales over that time.
- 28 properties were available for sale with an average price of \$295,000 for a 3-bedroom house. Available properties for sale included 11 3-bedroom and 9 4-bedroom properties.

#### **Holbrook**

- 31 properties were for sale.
- Fourteen properties were 3-bedroom homes, with a median price of \$320,000, and 14 were 4-bedroom houses with a median price of \$500,000.

#### **Walla Walla**

- The median property price in Walla Walla between June 2022 to May 2023 was \$382,000 based on seven house sales over that time.

## Albury

- The median property price in Albury between June 2022 to May 2023 was \$810,000 based on 41 house sales over that time.

Given that the construction period is estimated to take approximately XX months, it is assumed that some of these workers are likely to relocate their families to the local area. Based on this review, there are limited potential properties within the GHS LGA for rent or purchase.

## 6.4 Intended social outcomes

The intended social outcomes for this strategy are:

- Prioritise procurement and employment of local businesses and workers during all stages to minimise impacts on housing demand.
- Prioritise accommodation within the GHS LGA to maximise potential spend in the Shire.
- Prioritise clusters of accommodation to minimise traffic impacts.
- Reduce and avoid upward pressure on housing prices, rental costs and demand that may result from Project activities.
- Reduce and avoid impacts on local tourism industry and local events.
- Monitoring and adjustments to the accommodation strategy throughout the Project lifecycle to prioritise workforce needs, impacts on neighbouring locations and on-going stakeholder feedback.

## 6.5 Action plan and mitigation strategies

The Culcairn Accommodation Strategy Action Plan (Table 6-4) presents proposed actions to accommodate workers during the Project cycle. It is assumed that the other State significant development in the area that are either approved or proposed, including Jindera Solar Farm, would have an impact on the availability of short-term or rental accommodation. Assessing potential cumulative impacts will form part of the regular monitoring for this Strategy.

Table 6-4 Accommodation Strategy Action Plan

Project aspect	Measures	Responsible Party	Objective	Timing	Implementation Action	Compliance Record
Accommodation Strategy	Prepare an AES in accordance with Schedule 3, Condition 33	Neoen Project Manager		Prior to construction	This AES	This AES
Accommodation Strategy	Implement an AES in accordance with Schedule 3, Condition 33	Neoen Project Manager EPC Project Manager EPC HSE Supervisor/Coordinator All employees and contractors		Prior to construction; ongoing	This AES	This AES
Housing availability, local procurement, and local employment	Prioritise and select sub-contractors that can demonstrate a high proportion of workforce living in the GHS LGA (Tier 1), the Albury City and Wagga Wagga LGAs, or greater Riverina Murray Region (Tier 2).	EPC Project Manager EPC HSE Supervisor/Coordinator	Prioritise procurement and employment of local business and workers.  Reduce and avoid upward pressure on housing prices, rental costs and demand.	Establish sub-contractor selection criteria from Project inception	Embed selection criteria with a weighting of at least 10% to prioritise sub-contractors that employ workers from GHS (Tier 1), Albury City and Wagga Wagga LGAs or from the Riverina Murray Region (Tier 2).  Embed selection criteria with a weighting of at least 10% that employ sub-contractors with 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 GHS, Albury City and Wagga Wagga LGAs and the Riverina Murray Region and 2) proportion of sub-contractors appointed with businesses registered in the GHS, Albury City and Wagga Wagga LGAs and the Riverina Murray Region.
Housing availability	Where feasible, headlease proximal rental properties in the GHS LGA and Albury-Wodonga on year-long rental contracts to cover peak employment periods from	EPC Project Manager EPC HSE Supervisor/Coordinator	Prioritise use of local accommodation.  Minimise traffic impacts.	Preparation for main works construction	Headlease up to 10 houses where available and encourage house sharing for workers without dependents or partners.	Records of head leasing arrangements

Project aspect	Measures	Responsible Party	Objective	Timing	Implementation Action	Compliance Record
	September 2024 to September 2025 and secure rental properties.				Establish a monthly review process to monitor worker accommodation requirements throughout construction.	
Housing availability	<p>Prioritise booking short-term accommodation in Tier 1 (within GHS LGA), followed by Tier 2 (Albury City &amp; Wagga Wagga) locations.</p> <p>Liaise with short-term accommodation providers to manage peak accommodation timing.</p> <p>Liaise with local tourism industry and GHS and Albury City Councils to manage potential timing conflicts or cooperation opportunities with local events.</p>	EPC Project Manager EPC HSE Supervisor/Coordinator	<p>Maximise use of local services.</p> <p>Minimise traffic impacts.</p> <p>Minimise impacts on tourism industry and local events.</p>	<p>Throughout construction:</p> <p>Monthly review meetings with accommodation providers.</p> <p>Review meetings with GHS and Albury City Councils, and tourism operators as required.</p>	<p>Book short-term accommodation through priority arrangements with accommodation providers in Tier 1 and Tier 2 locations.</p> <p>Establish a monthly review process to monitor worker accommodation requirements throughout construction.</p>	Monthly review documentation
Housing availability & traffic management	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 traffic impacts	<p>Throughout construction:</p> <p>Internal monthly review of contracts, housing needs and housing availability</p>	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 worker and accommodation forecasts and location of accommodation for workers.
Traffic management	Where booking accommodation from larger suppliers, manage scheduling to allow for shuttle buses to site.	EPC Project Manager EPC HSE Supervisor/Coordinator	Reduce traffic impacts	<p>Throughout construction:</p> <p>Monthly review of worker accommodation requirements and shift timing</p>	Establish and maintain a register of projected worker accommodation requirements and options to prioritise accommodation sharing and/or clustering.	Register of worker and accommodation forecasts and location of accommodation for workers.

Project aspect	Measures	Responsible Party	Objective	Timing	Implementation Action	Compliance Record
					Hire shuttle buses from local providers to transport workers.	
Housing availability	Establish and maintain a register of local property owners who have expressed interest in offering dwellings for rent.	EPC HSE Supervisor/Coordinator	Prioritise use of local accommodation. Minimise traffic impacts.	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 rates of rental costs.	Maintain register of housing arrangements.
Housing availability	Consideration of contributing to workers accommodation and housing supply in the GHS LGA, focused on options in Culcairn, Walla Walla and Jindera, if other options have been exhausted.	Neoen Project Manager EPC Project Manager EPC HSE Supervisor/Coordinator	Reduce and avoid upward pressure on housing prices, rental costs and demand.	Prior to project construction commencement or operation commencement.	Greater Hume Council have expressed an interest to work with Neoen to identify long-term housing options in Culcairn, Walla Walla, and Jindera.  Work with Council and other interested stakeholders to investigate and/or co-deliver worker accommodation that could contribute to local housing infrastructure.	Maintain register of direct engagement with Greater Hume Council to discuss / plan / contribute.
Housing availability	Consideration of temporary worker accommodation facilities during peak construction in Q1 and Q2 2025 if unable to secure / to reduce pressure on short-term accommodation providers during peak times (i.e., March-April for Albury City LGA).	Neoen Project Manager EPC Project Manager EPC HSE Supervisor/Coordinator	Reduce and avoid pressure on short-term accommodation and rental demand.	Q1 and Q2 2025, as necessary.	Liaise with Greater Hume and Albury City Councils, short-term accommodation providers, tourism bodies, and event organisations to assess potential (cumulative) impacts on the rental market and short-term accommodation, and consideration of alternatives.	Maintain register of engagement with Greater Hume and Albury Councils and other key stakeholders.

## 7. MONITORING & REPORTING

Where relevant, Neoen will include AES (IAPP and Accommodation Strategy) 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 these EPC contracts the minimum contents of monthly reports are defined so Neoen can ensure strict reporting rules. Therefore, Neoen can track, monitor and address the head EPC contractors (and its subcontractors') compliance. Neoen and the head EPC contractor must meet at least once every week in accordance with the EPC contract, which ensures close communication between the management teams.

The EPC contractor will be required to report on the AES metrics monthly while Neoen's reporting to external bodies such as the NSW Government will be quarterly during construction and annually during operations (unless otherwise specified).

Consultation during construction will be implemented by the Community Liaison Officer in collaboration with the EPC Contractor in accordance with the Project's Community Communication Strategy (CCS). This strategy includes multiple opportunities for consultation and feedback through initiatives such as an enquiries and complaints register and personal meetings with near neighbours, community groups and key stakeholders. Outcomes of these activities are recorded in the stakeholder register, which is then used as a data source for monitoring and reporting.

The following metrics and strategies should underpin monitoring and reporting of the Project (Table 7-1). The objectives of monitoring and evaluation should be to do the following:

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

The EPC will be required to report on these metrics (written into their contract) and the Neoen Project Manager will evaluate and oversee that these targets are achieved. If needed, the Neoen Project Manager will step in along with the Community Liaison officer to reevaluate strategies to get back on track to meet goals.



**Table 7-1 Indicators and mechanisms for monitoring**

Outcome		Metric	Reporting	Responsibility	Communication channel
1	AU/NZ Procurement before COD	10% Project Contract Value	Monthly	Neoen Project Manager EPC Project Manager	Key stakeholder meetings between EPC Contractor, Neoen, local and AU/NZ businesses, ICN
2	Training, Skills & Knowledge Transfer	10% Work hours	Monthly	Neoen Project Manager EPC Project Manager EPC HSE Supervisor / Coordinator	Key stakeholder meetings between EPC Contractor, Neoen, local training & skills organisations
3	Opportunities for Underrepresented Groups	5% Work hours	Monthly	EPC Project Manager EPC HSE Supervisor / Coordinator	Key stakeholder meetings between EPC Contractor, Neoen, local/regional employment agency Maintain register of interested local suppliers/workers and send periodic newsletters with construction updates
4	Opportunities for Local people	10% Work hours	Monthly	EPC Project Manager EPC HSE Supervisor / Coordinator	Key stakeholder meetings between EPC Contractor, Neoen, accommodation providers, Greater Hume Council, ICN, RDA Murray Maintain register of interested local suppliers/workers and send periodic newsletters with construction updates
5	Opportunities for Regional people	10% Work hours	Monthly	EPC Project Manager EPC HSE Supervisor / Coordinator	Key stakeholder meetings between EPC Contractor, Neoen, accommodation providers, Greater Hume Council, ICN, RDA Murray Maintain register of interested regional suppliers/workers and send periodic newsletters with construction updates
6	Opportunities for First Nations people*	1.5% Work hours	Monthly	EPC Project Manager EPC HSE Supervisor / Coordinator	Key stakeholder meetings between EPC Contractor, Neoen, Supply Nation, First Nations organisations
7	Opportunities for First Nations businesses	1% BOP Spend	Monthly	EPC Project Manager	Key stakeholder meetings between EPC Contractor, Neoen, Supply Nation, First Nations organisations
8	Headlease rental properties for longer contracts prioritised	# of headleases	Monthly	EPC Project Manager	Key stakeholder meetings between EPC Contractor, Neoen, accommodation providers, Greater Hume Council
9	Short-term accommodation prioritised	70% local accommodation (Tier 1, Tier 2)	Monthly	EPC Project Manager	Key stakeholder meetings between EPC Contractor, Neoen, accommodation providers, Greater Hume Council
10	Stakeholder engagement and complaints resolution		As necessary	Neoen	Internal review and management of Project feedback and direct communication with individuals or groups raising complaints or providing feedback.

*\*Suppliers must be certified by Supply Nation to be eligible for inclusion in this metric. EPC contractor must sight and retain a copy of certification for each eligible supplier.*

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# APPENDIX A Neoen Sustainability Framework

## Spreading our Wings

Excerpt of The Ten Principles of the United Nations Global Compact

Grounded in global principles and goals

Our framework acknowledges and references a number of abiding principles as well as the United Nation's Sustainable Development Goals.

**TEN PRINCIPLES**

The Ten Principles of the United Nations Global Compact are derived from: the Universal Declaration of Human Rights, the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, the Rio Declaration on Environment and Development, and the United Nations Convention Against Corruption.

<p><b>1</b>   <b>Human rights:</b> Support and respect the protection of internationally proclaimed human rights</p>	<p><b>6</b>   <b>Labour:</b> The elimination of discrimination in respect of employment and occupation</p>
<p><b>2</b>   <b>Human rights:</b> Ensure the business is not complicit in human rights abuses</p>	<p><b>7</b>   <b>Environment:</b> Support a precautionary approach to environmental challenges</p>
<p><b>3</b>   <b>Labour:</b> Uphold the freedom of association and the effective recognition of the right to collective bargaining</p>	<p><b>8</b>   <b>Environment:</b> Undertake initiatives to promote greater environmental responsibility</p>
<p><b>4</b>   <b>Labour:</b> Elimination of all forms of forced and compulsory labour</p>	<p><b>9</b>   <b>Environment:</b> Encourage the development and diffusion of environmentally friendly technologies</p>
<p><b>5</b>   <b>Labour:</b> The effective abolition of child labour</p>	<p><b>10</b>   <b>Anti-corruption:</b> Work against corruption in all its forms, including extortion and bribery</p>

## APPENDIX B STAKEHOLDER CONSULTATION – IAPP DEVELOPMENT

Assessment Criteria	Area	Organisational partner	Consultation method	Notes
<b>Supply Chain</b> Opportunities to supply goods and services, local content commitments, local supply chain investment and innovation commitments and supporting strategies and actions. - Investment and innovation in the local supply chain in the NSW renewable energy sector including R&D related to challenges faced by the Project and its associated technology and start-ups and social enterprises related to renewable energy.	Regional strategies and networks	Regional Manager, ICN Wagga Wagga	Email chain 17/08/22 Teams meeting 24/08/22	Great connector with organisations in Riverina Murray ICN Gateway for Culcairn Solar Farm.
	Regional strategies and networks	Director, Regional Development RDA Australia - Murray region	Email chain 23/08/22	
	Focus on major regional projects, including Snowy 2.0, Inland Rail, Project Energy Connect, Defence, HumeLink	Regional Business Officer Department of Regional NSW	Email chain Teams meeting 19/09/22	Two Aboriginal Program Managers are joining the Dept in October 2022 and will be interested to chat in early 2023. Look at alignments in 2023.
<b>Employment and Workforce</b> Employment and workforce development commitments and supporting strategies and actions. - Community development that involves innovative training and employment initiatives or programs that reach underrepresented groups such as women, long-term unemployed and Aboriginal people, and	Employment Education and Training	Chair, Murray Riverina Local Jobs and Skills Taskforce Employment Facilitator, Department of Skills Education and Employment Wagga Wagga	Email chain 24/08/22 Teams meeting 2/09/22	Employment in the Riverina region
	Focus on: - Work readiness. - Pre-employment skills - Schools programs - Social support network	Business Development Officer, GTES Complete Apprenticeship Management Wagga Wagga	Email chain 19/09/22 Teams Meeting 19/09/22	Host employer contract

Assessment Criteria	Area	Organisational partner	Consultation method	Notes
includes appropriate strategies and actions such as pre-employment training, scholarships, cross-skilling to renewables and supporting apprentices.	Employment Training - Women - Youth	CEO, SQUAD Albury	Email chain 19/08/22 Teams Meeting 01/09/22	Information regarding female Apprentices and Traineeships requirement within NSW
		A/Business Sales Manager, TAFE NSW Manager, Business & Industry, TAFE NSW Wagga Wagga	Email chain 1/09/22 Teams Meeting 6/09/22	Training and upskilling
	RIEP I - NSW Government initiative that strengthens connections between local industry and secondary school communities. - Work experience - Industry tours - Non-accredited training  'Girls Can Too' – non-traditional trades for girls	Training Services Manager, Training Services NSW  Senior Project Officer – Regional Industry Education Partnerships (RIEP)  Training Services NSW Wagga Wagga	Email chain 1/09/22 In-person Meeting 7/9/22	
<b>First Nations Participation</b> - Involving First Nations communities through innovative products, processes, technologies, and services across the development, construction and operations phases of the project that have wider applicability in the sector.	Regional mechanism through which Riverina Murray communities can collectively identify priority issues and engage with government and key service delivery stakeholders. Link to NSW Government's OCHRE Plan.  Ten communities including Albury and Wagga Wagga.	Chair, Riverina Murray Regional Alliance (RMRA)  Senior Project Officer, RMRA  Wagga Wagga	Email chain 19/08/22 Teams Meeting 1/09/22	Important regional partner with strong community links in Albury region and government connections.



Assessment Criteria	Area	Organisational partner	Consultation method	Notes
	<p>Consultative body for Aboriginal cultural issues in Albury area.</p> <p>Andom is the primary contact for all communications.</p>	<p>CEO, Albury &amp; District Local Aboriginal Land Council (ADLALC)</p> <p>Chief Cultural &amp; Heritage Officer (primary contact for all communications)</p> <p>Lavington</p>	<p>Email chain 19/9/22</p> <p>Teams Meeting 19/9/22</p>	
	<p>Indigenous Careers &amp; Employment</p> <p>Pre-Employment Programs</p> <p>Supply Nation registered.</p>	<p>Connexions</p>	<p>Email chain 2/9/22</p> <p>In-person Meeting 7/9/22</p>	<p>Works with Ironbark Training</p>
	<p>Recruitment, labour hire, training for infrastructure and resources sector</p> <p>Supply Nation registered.</p>	<p>Ironbark Training</p>	<p>Email chain 22/8/22</p>	
	<p>Tailored construction, project management and procurement services throughout Australia.</p> <p>Founded On Country Pathways</p> <p>Supply Nation registered.</p>	<p>Managing Director, TVN On-Country</p>	<p>In-person Meeting 5/9/22</p> <p>Email chain 7/9/22</p>	<p>Work team - female (28%) and Indigenous (20%) employees</p>
	<p>Employment and career pathway programs for 15- to 24-year-old Indigenous young people – in the commercial construction sector.</p> <p>Supply Nation registered.</p> <p>Wholly supported by TVN On-Country</p>	<p>General Manager, On-Country Pathways</p> <p>Program Manager, On-Country Pathways</p>	<p>Email chain 15/09/22</p>	<p>Certificate II in Business Administration traineeship is a solid option and attracts both women and men (Two women have completed in 2022 and found work with OCP support)</p>



Assessment Criteria	Area	Organisational partner	Consultation method	Notes
	Workplace training for specific industries (partner with RTO) Supply Nation registered	Education Services International / ERDDIG Economic Research Design Development Indigenous Investment Group	Email chain 1/9/22 In-person Meeting 7/9/22	Also delivers Aboriginal induction for worksites
		Aboriginal Education & Engagement Coordinator TAFE NSW	Teams Meeting 6/9/22	
	Recruitment and Labour Hire Pre employment training Supply Nation registered	Ngumbaay Indigenous Corporation	Email chain 22/8/22	Works with Ironbark Training
		Mungabareena Aboriginal Corporation Wodonga	Email chain 22/8/22, 19/09/22	

## APPENDIX C Stakeholder Consultation Log - IAPP development

List of all organisations contacted during IAPP development (including those in Appendix B)

Culcairn Solar Farm – Stakeholder Engagement Database for IAPP			
Date	Organisation	Category	Location
17/08/2022	ICN Wagga	Industry support	Wagga
19/08/2022	Squad	Employment, training	Albury
19/08/2022	Riverina Murray Regional Alliance (RMRA)	First Nations consultation	Wagga Wagga
19/08/2022	Riverina Murray Regional Alliance (RMRA)	First Nations consultation	Wagga Wagga
22/08/2022	Supply Nation	Procurement, Aboriginal businesses	VIC
22/08/2022	Woomera Aboriginal Corporation	First Nations Support	Albury
22/08/2022	Ironbark Training	First Nations business, recruitment, labour hire, training,	Wagga
22/08/2022	Omnia Inclusive	First Nations business, recruitment, labour hire, training,	Albury
22/08/2022	Aboriginal Beata Terra	First Nations business, recruitment, labour hire, training,	Wagga
22/08/2022	Business Wodonga	Wodonga chamber of commerce	Wodonga
22/08/2022	Albury Business Connect	Albury chamber of commerce	Albury
22/08/2022	TVN On-Country	First Nations business, recruitment, labour hire, training,	Albury
23/08/2022	RDA Australia – Murray region	Regional development	Albury
23/08/2022	Murray Riverina Local Jobs and Skills Taskforce	Regional development	Albury
23/08/2022	Training Services NSW	Regional development	Wagga Wagga
23/08/2022	TAFE NSW	Training, employment	Wagga Wagga
23/08/2022	Wodonga TAFE	Training, employment	Wodonga
23/08/2022	Connexions	First Nations business, recruitment, labour hire, training	Griffith
23/08/2022	Asuria	Recruitment	Albury
23/08/2022	The Personnel Group	Recruitment	Wodonga
23/08/2022	On Country Pathways	First Nations business, employment support	Wodonga
24/08/2022	Business NSW	Business Development	NSW
24/08/2022	ERDDIIG Indigenous Supply Chain Specialists	First Nations business, training, employment	Wagga Wagga
24/08/2022	Ngumbaay Indigenous Corporation	First Nations business, training, employment	Wagga Wagga
24/08/2022	Training Services NSW	Training, employment	NSW

Culcairn Solar Farm – Stakeholder Engagement Database for IAPP			
24/08/2022	Regional Development Australia Riverina	Regional development	Wagga Wagga
24/08/2022	Charles Sturt University	Training, employment	Wagga Wagga
6/09/2022	TAFE NSW	Training, employment	Wagga Wagga
6/09/2022	TAFE NSW	Training, employment	Wagga Wagga
7/09/2022	TAFE NSW	Training, employment	Albury
17/09/2022	Avonlie Solar Farm Narrandera	First Nations workforce	Narrandera
19/09/2022	Mungabareena Aboriginal Corporation	First Nations consultation	Wodonga
19/09/2022	Albury LALC	First Nations consultation	Lavington
19/09/2022	Aboriginal Land Council Southern Zone Office	First Nations consultation	ACT
19/09/2022	NSW Local Aboriginal Land Council	First Nations consultation	West Wyalong
19/09/2022	Department of Regional NSW	Regional development	Riverina Murray
19/09/2022	Walla Walla Public School	Pathways into employment	Walla Walla
19/09/2022	TVN On-Country	Procurement	Albury
19/09/2022	GTES Complete Apprenticeship Management	Apprenticeships, training	Albury
21/09/2022	Albury & District Local Aboriginal Land Council (LALC)	First Nations consultation	Albury
26/09/2022	GTES Complete Apprenticeship Management	Employment, training	Wagga Wagga
19/10/2022	Wamarra	First Nations business, recruitment, labour hire, training	Wagga Wagga

## APPENDIX D Council Consultation

Consultation log for the Accommodation and Employment Strategy.

Date	Method	Position	Organisation	Contact	Purpose
10/05/2023	Email	General Manager	Greater Hume Council	NGH	Email to schedule a meeting to discuss the proposed approach to developing a supporting Accommodation Strategy as a part of Neoen's existing IAPP to fulfil the requirements of Condition 33, Schedule of the Condition of Consent (COC).
11/05/2023	Teams meeting	General Manager	Greater Hume Council	NGH	Teams meeting to brief GHC on the development of the Accommodation Strategy and to scope potential accommodation options and challenges.
11/05/2023	Email	Director of Environment and Planning	Greater Hume Council	NGH	Email to advise that the Accommodation Strategy was being developed, how the strategy would comply with CoC stated on Page 13 and Condition 33, Schedule 3. The table of contents for the draft Accommodation Strategy provided.
12/05/2023	Email	Director of Environment and Planning	Greater Hume Council	NGH	Council confirmed they supported the approach and proposed content of the Culcairn Solar Farm Accommodation Strategy.
16/05/2023	Email	Executive Assistant, Governance, Tourism and Communications	Greater Hume Council	NGH	Email to Council to advise the Accommodation Strategy was being developed and to seek data on occupancy rates.
23/05/2023	Email	Executive Assistant, Governance, Tourism and Communications	Greater Hume Council	NGH	Council provided anecdotal information regarding occupancy rates; forwarded latest tourism statistics for the Albury-Wodonga region and links to accommodation providers and upcoming events in the LGA.
26/06/2023	Email	General Manager	Greater Hume Council	Neoen	Accommodation Strategy sent to GHC for information and comment.
18/07/2023	Email	Director of Environment and Planning	Greater Hume Council	Neoen	Council confirmed approval of the final IAPP, including the Accommodation Strategy.

Date	Method	Position	Organisation	Contact	Purpose
12/09/2023	Email	Director of Environment and Planning	Greater Hume Council	NGH	Email to request a meeting or call with Council to discuss feedback from DPE regarding the IAPP and Accommodation Strategy.
15/09/2023	Teams meeting	Director of Environment and Planning	Greater Hume Council	NGH	Discussed DPE feedback with a focus on temporary workers accommodation and alternatives; cumulative impacts; patterns of accommodation use for Walla Walla Solar Farm.
15/09/2023	Phone call	Visitor Services Coordinator	Albury City Council	NGH	Called Council with questions about Albury short-term accommodation and occupancy rates, peak times and events, and capacity of accommodation to cope with cumulative impacts from several large infrastructure projects.
25/09/2023	Phone call	Economic Development Officer	Albury City Council	NGH	Council called and provided more information regarding potential cumulative impacts on short-term accommodation and the local rental housing market and highlighted non-renewable infrastructure projects (Defence and Health) that are likely to have construction timelines that overlap with this Project.
26/09/2023	Email	Director of Environment and Planning	Greater Hume Council	Neoen	Provided updated AES to Council for review and approval.
11/10/2023	Email	Director of Environment and Planning	Greater Hume Council	Neoen	Council confirmed approval of the updated AES.

Email acceptance from Greater Hume Council.

## Nicholas Fox

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**De:** Colin Kane <CKane@greaterhume.nsw.gov.au>  
**Envoyé:** mercredi 11 octobre 2023 16:54  
**À:** Nicholas Fox  
**Objet:** Culcairn Solar Farm - Accommodation and Employment Strategy

**EXTERNAL:** Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hello Nicholas

Please be advised that the Culcairn Solar Farm- Accommodation and Employment Strategy dated September 2023 has been reviewed by Council and has found to be satisfactory.

Regards

Colin Kane  
Director Environment & Planning  
Greater Hume Council  
39 Young St  
PO Box 99  
Holbrook NSW 2644  
T 02 6036 0131 M 0428 667 071



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