SSD-21208499 Glanmire Solar Farm Submission by Glanmire Action Group Objecting to Proposal

14 December 2022



Responding to Elgin Energy's
Environmental Impact Statement
November 2022

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1: THE GLANMIRE ACTION GROUP (AG)

1. This Submission has been prepared by members of the Glanmire Action Group. Hereinafter called "AG".

2. Our Group was formed in about 20 November 2020 to combat the proposal by "Elgin Energy" to install a solar plant on 140 hectares of a 186 hectare site located at 4823 Great Western Highway, Glanmire NSW 2795.

3. Our Group, at its nucleus consists of the following people:

   (a) Sam and Pauline (Polly) Bonanno (244 Brewongle Lane, Glanmire),

   (b) Joanne and Andrew Petch (264 Brewongle Lane, Glanmire), and

   (c) Peter and Denise Hennessy (457 Brewongle Lane, Glanmire)

4. The AG has a broad support base, with approximately 300 supporter signatories **(**See **Document 1: Petition**) and in fact many more.

2: INTEGRITY AND FAIR DEALING

5. We believe that we enjoy within the community a reputation for integrity. Moreover, certain members of our Group, namely, Peter Hennessy, Polly and Sam Bonanno, Andrew Petch, Peta and Liam O'Hara, brought to our Group some background knowledge in relation to solar proposals. That background knowledge had been gained by them being members of the "Brewongle Action Group". That Group was formed in about 2017 to combat the proposal by "Photon" to install a solar plant on about 200 hectares of land at Brewongle.

6. We believe the proponents character and antecedents are important. We came to learn that particularly at the time the entity 'Photon' proposed a solar plant at nearby Brewongle. Background information, character and antecedents are important because we take the view that we are all legal accountable for what we say and do. Equally, in our view, our opposer, the Proponent, should be legally accountable for what he / it says and does. It is wrong if for example a corporate structure is such that it is not in reality legally liable for an unwanted debt. Depending upon its structure a corporation can rather readily avoid creditors, simply by going into liquidation or alleging that the relevant entity, the entity with funds, is not in the jurisdiction. (See Document 2: Sustainable Energy Generation Grp., LLC v. Photon Energy Projects B.V.**)**

   To present itself to the community as something different to what it really is, we believe, is seriously wrong.

7. We believe, and continue to believe, that we were and are entitled to know, character and antecedent details.

3: STATE PLANNING AUTHORITY – GUIDING PRINCIPLES

8. Our Group understood and understands, that the NSW Department of Environment and Planning, (hereafter referred to as the State Planning Authority (SPA) and the planning process for *"State significant projects"* is, almost of necessity, lopsided in that:–

    a) On one hand, there is a Proponent, often foreign to the area, with significant resources, and prepared to expend the same in its ambition to succeed in its Development Application and to realise the financial benefits that may follow to it from a successful proposal.

    b) On the other hand, one has the community into which it is intended the proposal be installed/ imposed. The community is often a diverse group of people following their own separate rural and other pursuits, with limited contact with sparsely located neighbours and often of moderate means, particularly after meeting their existing commercial and familial commitments.

9. The State Planning Authority appears to recognise this by, as we see it at least, promoting consultation, frankness, and honest exchange between each side, and with the SPA.

10. We embarked upon this process with such principles instilled in our minds, particularly by those involved in the Brewongle Action Group.

11. One of our members, Peter Hennessy, a fairly recently retired Senior Counsel, who has provided all his assistance gratuitously to our Group, advised that our legal system insists upon no *"trial by ambush"*, and indeed insists upon frank and early exchange of intelligence between parties so as to facilitate "consultation, frankness, and honest and meaningful exchange".

12. A model example of this includes the prompt exchange of expert reports and assessments. This exchange is most critical, for example if, after the service of an expert's Report the opposing party may wish to dispute its contents.

    In the normal course, our action group expert ought, we suggest, be invited to attend the subject site with the Proponent's expert, with a view to agreeing upon or having input into soil sample taking locations. Such matters should never give rise to a dispute.

    In this instance, the Proponent was aware we proposed obtaining our own experts, this was apparent from our brochure, published before 14 May 2021, but our Group received no invitation to attend the soil sample taking.

    These broad principles apply to an "adversarial system" and so should be basic in a "consultative" system such as the State Planning Authority stipulates.

13. It was with these standards in mind that our Group expected the Proponent to perform, and we to reciprocate.

4: THE LAND

14. With the quality of the land slated for planned large solar developments playing a significant role in the consideration for planning approval, it is worth taking a moment to look back over the history of this fertile land.

15. The land on which the solar plant is proposed, namely 4823 Great Western Highway, consists of basalt, granite, and alluvial soil, sharing its soil type with its immediate neighbours, particularly to the south and west. The soil at this site is helped by water movement. The land at this site drains to the south, into a creek known today as Saltwater Creek.

16. Saltwater Creek flows into the Fish River which flows into the Macquarie River which flows west to the Macquarie Marshes and beyond.

17. This valley became home to people of the Wiradjuri Nation, who cared for Country with deep knowledge of, connectedness to and heartfelt responsibility for its balance and health.

18. In 1813 Europeans came upon the area. At this time, the higher ground was well-timbered. There were open grasslands around what is now Bathurst City, and there were less timbered areas in between.

19. Surveyor George Evans, in December 1813 diarised the following:

> *"I cannot see the termination north of me: The soil is exceedingly rich and produces the finest grass intermixed with a variety of herbs; the hills have the look of a park laid out; I am at a loss for language to describe the country. I named this part 'Macquarie Plains."*

He was directly looking at and commenting on this Brewongle/ Glanmire location.

20. Early European farmers believed "the rain followed the plough", and cleared the better land; over-cleared it in fact, to be used in particular for cultivation, the growing of crops.

21. Shade trees were left on land to shade stock, but better-quality land, like that at 4823 Great Western Highway, was cleared for cultivation.

22. This clearing of cultivation land can be contrasted with the land just a short distance to the east of the Glanmire site where trees remain, and the land has by-and-large been used for grazing since those early farming days.

See Document 3: Video https://www.youtube.com/watch?v=Ws0fHO4Iras

23. On the western side of 4823 Great Western Highway there remain clumps of trees, on land not so suitable for cultivation.

See Document 4: Photo Identifying Treed Area to West of Site

This land no doubt having been identified as quality land, was in 1822, the subject of one of the initial Crown grants by Governor Brisbane, and this land was granted to Richard Aspinall (London and Liverpool merchants Aspinall Browne & Co)

24. The land immediately to the south was at about the same time, a land grant to William Cox, the surveyor of the first road across the Blue Mountains) and to the east, was a grant to Warnham and William Browne Brothers (the first pioneers to bring sheep in any significant numbers across the mountains).

This land was recognised from the outset of being of high quality.

5: BACKGROUND

INITIAL INTERACTIONS WITH ELGIN ENERGY PTY LTD

25. [redacted] (Elgin Energy) and one [redacted] (Energy Forms) attended to meet several of us on or about 16 November. The meeting and the contents thereof were expressed to be *"without prejudice"* to any process.

26. The "*without prejudice*" component of this agreement has long since been abandoned by [redacted] (See Document 5: [redacted] Assertions – BMEC 15.09.2022**,** paragraph 4, bullet point 1) and so we propose to comment upon it on that basis.

27. At the meeting [redacted] and [redacted] attended and presented us with a brochure (See Document 6: Elgin Energy Brochure). In the conversation that followed, their views/ position was made clear by them:-

(1) the decision had already been made to proceed regardless of community opinion;

(2) upon enquiry, they advised that the Proponent as at that time, "*had not turned a sod of soil*". No soil quality investigation had been performed, so the Proponent advised.

28. We noted the proponent's description "About Elgin Energy"

"Elgin Energy is an international solar developer with operations in Australia, UK and Ireland.

To date we have developed 21 projects…"

29. We further noted under the heading "reasons for choosing the proposed site include"

… . "Not identified as highest quality agricultural land.." or "biophysical strategic agricultural land"

30. In conversations that followed:

a) Our small group sought information as to the Proponent entity, its character and antecedents. We were provided with no information beyond the brochure.

b) We expressed our unanimous views of the land and the proposed site:-

(a) It's high productive soil and its high productive qualities on the land;

(b) The scenic quality of the land and its surrounds;

(c) We expressed concern about the likely adverse impact upon surrounding property values at the subject location. Matters (a) and (b) coupled with permissible land use, proximity to Bathurst and Raglan, added a “real estate value” to a “rural value” at the subject location.

(d) We advised of the importance of the land on employment from several aspects:-

- Rural work;
- Employment/ contracting for cultivating, weed control, sowing, stock feeding, cutting, raking, bailing, and or harvesting. All to be lost and;
- Any person reasonably advised would be likely not to build on building blocks, or to build a lesser home than otherwise, to ensure the block was not overcapitalised etc.

(e) The quality of this close knit rural community was discussed.

(f) The huge personal detrimental impact such an inappropriate proposal would impose upon the community. In that regard we referred to the recent disposal of Brewongle proposal, which in fact, split the community and seriously impacted upon community health. (See Document 7: P. O’Hara Personal Health Impact)

CONCLUSIONS FORMED

31. As a result of the AG’s early engagement with Elgin Energy Pty Ltd, and its director [redacted] the AG concluded that the Proponents persistent refusal to relevantly identify itself meant it was not to be trusted/ relied upon, and:-

a) The Proponent was relevantly non-informative and would proceed irrespective of the community’s views;

b) We ought to form a group. To be called the Glanmire Action Group (AG);

c) We ought to retain qualified persons to report upon aspects we considered relevant;

d) We ought to prepare an informative brochure to inform the local community and

e) We ought to follow the NSW Department of Planning and Environment principles outlined in 8 - 13 above.

SUBSEQUENT DEVELOPMENTS AND CONSULTATIONS

I: Field Day/Drop-in Session 14 and 15 May 2021

32. There was no contact, or contact of relevance made by the Proponent until we were informed of the 'field day/drop-in session' to be held on site 14 and 15 May 2021

    a) Several of our group attended the event and provided the Proponent with:-

        (a) a brochure, a copy of which is enclosed, (See Document 8: Glanmire Action Group Brochure). You will note from the brochure references to report as follows:

            - Anthony Daintith – Town Planner – Report dated 11.12.20

              See Document 10: A. Daintith Town Planner Report 11.12.2020

            - David Harbison – Agronomist – Report dated 16.11.20

              See Document 11: D. Harbison Agronomist Report 16.11.2020

33. At that meeting, the Proponent again declined to provide us with any detail as to its entity other than the information in this brochure. Genuine consultation did not occur.

    You will note that at the time of the Field Day/Drop-in Session, the AG already had an initial report from Mr David Harbison dated 16.11.20, and an initial report of Mr Anthony Daintith Town Planner Report dated 11.12.20, referenced above.

34. Thereafter, we appropriately briefed and obtained further reports as follows:-

    - Document 12: Tremain & Ivey Advising Report 19.1.2021
    - Document 13: Tremain & Ivey Advising Report 12.12.2022
    - Document 14: C. Mizon Insurance Broker Report February 2021
    - Document 15: D. Harbison Report Update 15.06.2022
    - Document 16: D. Harbison Report Update 9.12.22
    - Document 20: Michael Lund Initial Report 1.7.2021
    - Document 22: Andrew Bickford Initial Report 2.7.2021

For convenience, we advise further reports have been obtained following publication of the EIS, as follows:

a) Document 17: Erika Dawson Bushfire Expert Report, 7 December

b) Document 18: Graham Swain Fire Report 5.12.2022

c) Document 19: Anthony Daintith Report 14.12.2022

d) Document 21: Michael Lund Second Report 8.12.2022

e) Document 23: Andrew Bickford Second Report 13.12.2022

In each case, relevant histories were provided to the experts. Histories may be read on the attachments.

II: Scoping Report - June 2021

35. On or about 8 June 2021, our AG received a copy of the Proponents "Scoping Report".

36. Our Group identified by reference to the Planning Authority, the requirements of the Scoping Report. Our Group identified what we regarded as clear misdescriptions of information or the withholding of information.

37. A member of our Group, Peter Hennessy, immediately prepared a letter and forwarded the same to the NSW Department of Environment and Planning (See Document 24: P. Hennessy letter to DPE 9.06.2022). You will note that the reports referred to above were enclosed.

38. If not before the arrival of Mr Hennessy's letter, most certainly very shortly thereafter, another member of our Group was informed that the Planning Authority had already issued a *"SEARs"*.

39. We suggest the Proponent was less than frank with the SPA in the preparation of its Scoping Report. We refer to the contents of Document 24: P. Hennessy letter to DPE 9.06.2022.

III: AG's Communication with SPA – Mr Preshaw

40. Mr Hennessy, thereafter, on or about 3 September 2021, had a most informative and helpful telephone conversation with the SPA's, Mr Preshaw.

There was courteous and helpful exchange as to:-

1. The timing for our AG to make submissions;

2. The insurance issue being perhaps a matter for the legislature rather than the SPA;

3. Other matters of assistance.

We were satisfied with the exchange.

Our Mr Hennessy thereafter met with our local state MP the Hon. Paul Toole, in the company of Mr Liam O'Hara, and informed him of Mr Preshaw's advice.

We sent further letters, but no reply has been received in relation to the insurance issue.

At a later stage, Polly Bonanno wrote to Mr Toole raising several issues, but relevantly, the insurance issue. (See Document 25: P. Bonanno letter to P. Toole 8.06.2022)

IV. The Next Event

41. At a later stage Mr Hennessy was asked whether he would mind if his letter (together with attached Reports) was passed on to Elgin Energy for its response. Mr Hennessy agreed to that course but asked that Elgin's response be provided to him for his reply.

The Authority agreed.

Thereafter, no response was ever received by Mr Hennessy. The CCC promised to follow this up but still, no response was ever received.

In the absence of a response from the SPA, we cannot conclude the Proponent failed to respond to it. If in fact it failed to respond, such failure is, we suggest, consistent with our formed view of the Proponent and its lack of consultation.

V. AG's Offers to Meet with Proponent

42. We offered to meet the Proponent but publicly. We did not wish to obstruct the Planning Process but did not trust the Proponent (See Document 26: Correspondence - Offering to Meet)

Particulars of offers:

1. Several oral offers – ignored by Proponent
2. 22.04.2022 Recorded offer to have an open community meeting with Elgin – Proponent ignored
3. 13.07.2022 Email to Proponent – Proponent ignored
4. 31.08.2022 Email to Proponent – Ignored by Proponent

This failure to consult is again consistent with the Proponent's conduct to not engage and consult.

VI. Soil Samples Taken Without Consultation with AG or Agronomist

43. On or about November 2020 the Proponent had soil samples taken from the site, without communicating with or inviting the AG or their agronomist to attend.

This failure is consistent with our formed view of the Proponent. It's failure to consult/frankly inform.

VII. Bathurst Show Stall 29 and 30 April 2022

44. As to the proponent's Bathurst Show stall. We attended the Show. We attended the Proponent's stall. We cannot refute the *"approximate 50 face-to-face meetings"* the Proponent asserts it had. We agree they included MP Mr Andrew Gee, but would dispute any suggestion that he supports the project proposal. We cannot dispute the miniscule number of 50 over the two day period. We can report however, that our recent enquiry (since the publication of the EIS) has revealed that 11 persons asked for a petition, and when it was provided by the Proponent, they signed their opposition. (See Document 27: Signed Opposition, Bathurst Show Engagement)

    We have in fact identified 11 persons who attended the stall and expressed their opposition.

    As best we can ascertain, those documents were provided within a period of a few hours in time spread over the two days. We suggest this casts serious doubt on the suggestion that "70% of the community support the subject proposal". If that was the case, then of course, 39 out of the next 40 people would be required to support it. The integrity of the Proponent is we suggest, a major issue and its theorised support does not exist.

    The document, that is to say the Proponent's form/ forms/ petition, has not been produced. The Proponent's statement ought be regarded with suspicion, indeed disbelief.

45. Mrs Polly Bonanno also provided to the Proponent an informed petition, signed by 300+ people. (See Document 1: Petition)

    a) The petition disclosed that all or nearly all dwellings within approximately three kilometres radius were visited and 61 occupiers signed the petition. Approximately 5 occupiers declined to sign.

    b) Approximately 28 dwellings were visited within the next two kilometres or so and 28 occupiers signed the petition and none declined to sign the petition.

    c) The balance consisted of as many nearby residents as was practicable to visit, and about 106 signatures were obtained from the Central West; the remainder of signatories were in the broader community of Bathurst and even further beyond.

        The principal assistant in circularising the petition was Mr Jeff Green (now deceased). He was aware, as was Polly, of the protocol that we established. It was as follows: we showed each person a copy of the Proponent's brochure (see Document 6: Elgin Energy Brochure) and the Glanmire Action Group's brochure (see Document 8: Glanmire Action Group Brochure), we asked each person whether he/she had any questions; we then sought to deal with any questions and thereafter the person either signed or declined to do so. We

reject any suggestion that the petition was 'generic' if that is in some way intended to be critical of it.

We note that the Proponent has failed to refer to the document (see Document 1: Petition), or indeed the 300+ objectors noted thereon, when informing the SPA of the Bathurst Show stall event.

We suggest the Proponent has not been frank with the SPA. Its conduct goes beyond mere failure to consult, we suggest its percentage support alleged is highly unlikely.

VIII. Community Consultation Committee

46. Our Mr Hennessy was asked to be the person representing our group at the CCC.

In due course, Mr Hennessy had conversation with the appointed chairman Mr Ross and formed the view that he, Mr David Ross, was courteous and likely to be inclusive and all seemed positive for constructive consultation.

The above comments are made in a setting in which to that point in time, we had resolved to meet with the Proponent publicly only because of the trust issue already expressed by us.

Mr Hennessy advised that while he was happy to be the groups spokesperson, he was uncomfortable with the responsibility of reporting back to landowners with their lifesavings/ lifestyle etc at stake. Mr Ross advised that he could open the meeting to a disciplined public. Mr Hennessy advised that the group was well disciplined.

We noted the purpose of the CCC was to 'provide a forum for discussion between the Proponent and representatives of the community'.

In due course, Mr Hennessy attended the meeting. The CCC included, Mr Hennessy (representing the Group), Ms Curry and Mr Chandler (both representing the local community), Ms Pope, and a climate change representative (CCR), two Greens, and an employee of Bathurst Regional Council.

47. It ought be noted that Polly Bonanno attended the second CCC meeting, but it had a serious detrimental effect on her health and well-being and so she ceased to attend on medical advise. (See Document 9: P. Bonanno Health)

After introductions, the group watched the Proponent's slides depicting a typical solar plant and a typical battery. At a stage Mr Hennessy asked questions seeking to identify the Proponent, the entity that had purported to introduce itself, but was immediately stopped by the chairman.

Later the chairman advised he believed Mr Hennessy was asking questions that went to the Proponent's financial capacity to build the proposed solar plant. That was indeed not the case and had Mr Hennessy been asked at the time he would have so advised.

48. In due course, each person was asked to write down their "main concern". In Mr Hennessy's vast experience in adversarial, arbitral, and mediation events, this is an

inappropriate question to ask. His answer was “the proposal for the reasons as follows:…” that was not appreciated, it was intended that he isolate one point.

In due course he was also advised that the meeting would not be opened to group members or to the public because of his behaviour. Mr Hennessy resigned, but his reasons for his resignation were outlined in an email he thought might assist the SPA. We attach a copy of Mr Hennessy’s resignation letter from 4 April 2022, together with an email that preceded it dated 18 March 2022 (See Document 28: P. Hennessy – Emailed Letter of Resignation 4.04.2022). Shortly thereafter, the chairman sent to Mr Hennessy an SPA publication (See Document 29: SPA Publication from CCC Chairman). The publication was interestingly consistent with Mr Hennessy’s reasons outlined in his email, Document 28: P. Hennessy – Emailed Letter of Resignation 4.04.2022)

Shortly thereafter, the other two local community members resigned. They, we understand, expressed their reasons in writing.

There was, we suggest, disinterest in anything other than the Proponent’s superficial information.

We understand the public was never invited to attend the CCC.

It was unfortunate the CCC was not conducted by a more experienced chairman, providing a program allowing an appropriate discussion of topics, and a more representative cross section of the community. To provide a forum and ensure it opened for discussion as the SPA wished.

The CCC involved the Proponent meeting with the Council employee, Greens and Climate Change representatives. It was we suggest “a box ticking exercise”.

IX. Drop-in session - 19 May 2022

49. As to the *“drop-in”* session at Bathurst Memorial Entertainment Centre on 19 May 2022. We attended the session, along with about sixteen others attending as a Group. To attend the session many of us gave up the morning’s employment and looked forward to a discussion. We, but in principal Mr Hennessy, asked [redacted] some questions, again directed at the preliminary point still not answered; that is to say, who are we dealing with and what are his or its antecedents? All questions were unanswered.

50. There were two further matters [redacted] attempted to deal with as follows:

    a) [redacted] advised she or someone on her behalf had contacted as best she could recall ‘about 10’ residents within three kilometres and either four or six favoured the proposal, she couldn’t remember. Further discussion was stopped by [redacted];

    b) [redacted] advised her employer NGH Consulting, was trying to encourage Elgin to deal locally. Again, [redacted] intervened to stop further discussion.

51. At a stage, a person not known to any member of our Group, approached [redacted] and said words to the effect, "*Excuse me sir, do you mind if I film this conversation and put it on YouTube.*". [redacted], without excusing himself, immediately stood up and left the room, and did not return, and indeed after clear intersession by [redacted] from NGH Consulting, still would not return. In conversation with [redacted], she agreed to record that [redacted] had "aborted" the meeting. Thereafter our Group left.

52. After [redacted] vacated the room one or two of our members spoke with the person, and he advised that he was so fascinated by [redacted]s avoidance that he thought it was worth recording the event and putting it on YouTube. We obtained particulars of that person, who confirms these events.

53. In due course, two events occurred:-

    a) It became clear [redacted] failed to report as agreed; and

    b) [redacted] made assertions about the intervening person and about our group that were false.(See Document 5: [redacted] Assertions – BMEC 15.09.2022).

54. We regard this conduct by [redacted] as so serious and false that, we sought and obtained a statutory from Mr J.R. Mitchell, the person referred to above. (See Document 30: J. R. Mitchell Statutory Declaration).

55. We suggest the conduct by and statements of the Proponent directed to our AG are false. The falsehoods are consistent with all the Proponent's conduct that had preceded it. It is serious, false and we suggest totally inconsistent with what the SPA requires of a Proponent. The Proponent cannot be trusted.

X. Visit to 244 Brewongle Lane by [redacted] and [redacted] from State Planning Authority

56. On or about late July 2022 our Polly Bonanno received a call from the SPA advising it intended to visit our Group if our Group so desired. We welcomed the enquiry. We were asked to keep the number to three or people. We understood the reason for limiting the number, but did wonder the Proponent had conveyed what we regard as a false impression of us. We were pleased a limited number of us met with [redacted] and [redacted], Thursday 4 August 2022, 9am.

57. We regarded the meeting as most civil, positive and constructive.

    a) We explained to the SPA the level of difficulty we were experiencing in having any meaningful consultation with the Proponent and had real concern as to the truthfulness and accuracy of what was being conveyed to us and the SPA.

    b) From Polly's premises at 244 Brewongle Lane we were able to point to the site, demonstrating its profile, proximity and apparent qualities. We were able to explain to the SPA that the grazing stock that they saw on the premises was merely an important stage in the development of grain that might ultimately be harvested from the site.

    c) We discussed, generally, issues in relation to the matter, including insurance.

d) Refreshingly and by no means with the intention of committing the SPA to a position, we understood the SPA to comment that the insurance perspective that we were advancing was the first time it had been fully explained to them. Thereafter the meeting ended.

Please note that before this meeting we had completed a documentary video (See Document 3: Video https://www.youtube.com/watch?v=Ws0fHO4Iras) and in that documentary there was reference to poor dialogue with the SPA. We informed [redacted] of the existence of the completed video and advised that when we showed it we would make reference to this constructive visit. We did just that.

XI. Co-Chair Meeting 20 October 2022

58. Thereafter there was an exchange of correspondence between Mrs Bonanno and [redacted] (See Document 31: Communication on Co-Chair Agreement). The correspondence was directed to two matters:

(a) Our enthusiasm not to frustrate the process, and so our enthusiasm to have consultation with the Proponent but only at a mutually agreed time and place and with a chairman to be mutually agreed upon; and

(b) I sought confirmation that [redacted] had Reported that the Bathurst Memorial Entertainment Centre event had indeed been Reported as "aborted" by [redacted].

59. Throughout all correspondence that followed item (b) was ignored. Item (a) was agreed upon, but thereafter in fact ignored. The Proponent sought to unilaterally fix upon a date, a location, and a chairperson. The unilateral actions were rejected and in due course agreement was reached that included chairpersons. (See Document 31: Communication on Co-Chair Agreement).

Again we suggest this conduct is consistent with the Proponent's disregard for the AG and the determination to consult on its own unilateral terms.

60. The co-chair meeting was held at Keystone 1889, 99 Keppel Street Bathurst on 20 October 2022. At that meeting the following was disclosed for the first time:

(a) The Proponent is Elgin Energy Pty Ltd. It was incorporated in Australia in 2019. It has minimal capital and no assets;

(b) Its principal is [redacted] He had flown in from England or Ireland. Neither [redacted] nor Elgin Energy Pty Ltd is related to any English or Irish company. [redacted] is not, and has never been an office bearer or an employee of Elgin in the UK or Ireland or anywhere else;

(c) Elgin Energy Pty Ltd has never developed or delivered any solar project in the UK, Ireland, or indeed in Australia.

61. I refer now to EIS page 1, our subsequent investigations have revealed that the reputed relationship mentioned in (b) appears to be incorrect, and the "parent company" so

described in the EIS page 1, is in fact, a company to which the current company is a subsidiary. In any event, the structuring is such to ensure Australian's have no legal recourse to it.

62. Whatever the position, we do know this; that Elgin Energy Pty Ltd has no assets and no capital and so is not legally liable in any realistic way for any legal liability incurred in this country or to this community with which it disagrees. In other words, it can send itself into liquidation thus avoiding creditors. We also know, or imagine, that Elgin Energy receives money from overseas to pay the liabilities it chooses to incur.

XII. Summary of Elgin Energy's Poor Engagement

63. We suggest the preceding pages demonstrate the Proponent's pattern of behaviour of:

a) purporting to consult but telling the community nothing

b) Receiving documents (such as Document 1: Petition) and experts reports but not responding engaging at all thereafter

c) Avoiding open community meetings by failing to respond to community's requests

d) If cornered into an open community meeting, such as the meeting on the 19 May 2022, "abort it" if possible and make up a version without regard to the truth.

This conduct and this lack of credibility we suggest set the Proponent's course and was carried over into the Environmental Impact Statement.

6: THE GLANMIRE ACTION GROUP'S CASE

Please forgive any overlapping of subject matter when we deal with the several headings hereunder.

I. Change in the use of this highly productive land

64. We refer to section "4: The Land" above.

65. The subject property is some 186 hectares, has been considered by local farmers to be prime cultivation land. The property is located in what is known in the area as the 'Green Triangle' (Bathurst Plains), prized cultivation land, well known for its productive potential.

66. We believe this land is of superior quality. We are well supported in this view:-

a) The land has performed consistently, and productively producing highly successful crops for in excess of 70 years, indicative of class 2 and 3 land;

b) With reference to example photographs of class 2, 3, 4 and 5 land, it is evident the subject land is class 2 and 3.

LAND CLASSIFICATION EXAMPLES

Class 2 land



Photograph 2a. Deep structured Brown Vertosols (Brown Clays) on level alluvial plains with a minor risk of soil structural decline under cultivation

F Townsend/OEH



Photograph 2b. Very gently undulating rises with deep, well-structured, resilient soils that are capable of many agricultural enterprises such as broad-acre wheat production

Class 3 land



Photograph 3a. Recently sown gently sloping crop land on red Chromosols (Non-calcic Brown soils)

B Murphy/OEH



Photograph 3b. Gently undulating rises to low hills with long slopes (>500 m) which require basic earthworks, such as the graded banks seen here, to control runoff and erosion

C Murphy/OEH

Class 4 land



Photograph 4a. Moderately sloping land capable of occasional cultivation showing evidence of stubble burning

J Young/OEH



Photograph 4b. Undulating to rolling low hills which have increased risk of soil erosion and are unsuitable for regular cultivation

A Murrell/OEH

Class 5 land



Photograph 5a. Drainage plain with highly concentrated run-on, sodic subsoils and gully erosion

F Townsend/OEH



Photograph 5b. Land formed on acid volcanic parent materials with naturally acidic surface soils and sodic subsoils in lower parts of the landscape

B Murphy/OEH

THE SUBJECT LAND



c) For the assistance of the SPA, we sought to gather some actual experience of land use of the subject property for as long back as can be remembered. (See Document 3: Video https://www.youtube.com/watch?v=Ws0fHO4Iras) The people interviewed, summarily expressed themselves as follows:-

Mr Andrew Petch - 16:35
That block of land in particular has been cropped every year, including the drought, and including in that drought that block of land produced fat lambs, maybe not as many, but it still did.

Mrs Maureen Press - 16:44
Over a period of I suppose 50 years and it's just been continual cropping and grazing and been through some bad seasons and some good seasons and it's just always panned out that you know it's as good here as anywhere else in the district.

Mrs Viv Press - 17:29
All that ground from here right through. Across from the western highway there, it's all the same it's beautiful land. Too good to be putting on land like that.

Mrs Maureen Press - 24:50
Since we were involved, that was 1979, we were leasing it then we bought it in 1987 and we just know what we were able to do. Put in crops in some paddocks and we had a really nice line bred flock of merino wool and then we used to get the really top wool prices, whatever the wool prices were for our sheep. And the whole district used to, would get those. It was just top quality lambs.

Mrs R. Garment - 25:28
My husband and I have been farming here for over sixty years. We are primarily fat lamb producers, but over the years, Maurice grew a huge variety of crops. He has grown wheat, oats, barley, lucerne and one year won the Western District wheat competition.

Mr Andrew Petch- 27:59
It's had canola in it the year before last, it has winter wheat in it I presume this year, the year before the canola it had oats, it's a cycle that the people who are looking after it at present, and grazing it and cropping it, they've stripped canola off it and it was one of the best crops you've ever seen.

d) Further, we sought to obtain actual experience of the subject land.

Mr Mark Ryan, an experienced farmer in the area, and former lessee of the subject land observed the following:

> *"I leased this land for approximately 16 years, from the late 1980's to the early 2000's. I can say that this land was equal to any other land I farmed, and better than most. I harvested in excess of 500 ton off "Woodside" in 1996, being the crop sown in the winter of 1995".*

(See Document 32: M. Ryan, Experience)

67. Since 2014 the land was zoned as RU1 Primary Production under the Bathurst Regional Council's Local and Environmental Plan (LEP) 2014.

68. Since the Department of Planning, Industry and Environment through their eSpade service, have classified the land as Class 2 and 3. This classification of the land can be found at, https://www.environment.nsw.gov.au/ eSpade2Webapp/#. This classification continues to be supported by the Department.

69. Local Real Estate Agents, with in excess of 20 years' experience classify the land as prime cultivation land which is highly valuable. The value, productivity, and its location within the 'green triangle' is supported. The description of the land as class 4 and 5 was described by Mr Michael Lund and Mr Andrew Bickford as follows:-

MASTER STEPHENS & CO

a) "*The description of this land as 4 and 5 is totally foreign to my impression of the land.*

My knowledge of the productivity of this land, and of course the value of the land is as assessed by me and so many other agents and so many other purchasers over many years.

I adhere to the view that it is productive cultivation land"
(See Document 21: Michael Lund Second Report 8.12.2022).

ELDERS RURAL SERVICES BATHURST

b) "*At page 163 of the EIS, the land is described as class 4 and 5. This assessment is completely at odds with my knowledge and understanding of the quality and productivity of the land… I consider this land prime cultivation land*"
(See Document 23: Andrew Bickford Second Report 13.12.2022).

70. As already observed, the AG obtained an initial report from Mr Harbison (See Document 11: D. Harbison Agronomist Report 16.11.2020). After being provided with the Proponents Report, the AG obtained Mr Harbison response (See Document 15: D. Harbison Report Update 15.06.22) and obtained Mr Harbison's further response (See Document 16: D. Harbison Report Update 9.12.22). Salient observations of Mr Harbison as to the quality and classification of the land, include:-

REPORT - 16 NOVEMBER 2020

"This land can be appropriate used for broadacre dryland cropping, be it oats, canola, wheat, barley etc".

"At this place "the quality and health of the soil, the temperature range throughout the various distinct seasons and the rainfall combine and interact to render this land with great productive potential".

PEER REVIEW - 15 JUNE 2022

"According to Table 2 of The Land and Soil Capability Assessment Scheme the general definition of Land and Soil Capability (LSC) Class 3 is;

High capability land: Land has moderate limitations and is capable of sustaining high-impact land uses, such as cropping with cultivation, using more intensive, readily available and widely accepted practices. However, careful management of limitations is required for cropping and intensive grazing to avoid land and environmental degradation.

It is my opinion that this summarises nearly every ha on the proposed site, and is supported by the Department of Planning, Industry and Environment and its' eSpade service's 'Raglan Soil Landscape classification' of LSC Class 2 and 3. Limitations do exist in such soils, and management of those limitations is required. The implementation of today's best management practise of "non-till", "direct drill" and "conservation farming" activities, along with rotational grazing of crops, shows clear evidence of 'careful management'. That is exactly what is occurring at the site with little or no land or environmental degradation evident. There is high likelihood that some small areas of the site could in fact be assessed as LSC Class 2. The SLR classification of this site being LSC Class 4 and 5 contradicts that of the Department of Planning, Industry and Environments eSpade Service, and myself".

PEER REVIEW REPORT – 9 DECEMBER 2022

"My views in my previous reports, 16th November 2020 and 8th June 2022 have not changed, and remain supported by the NSW Department of Planning, Industry and Environment's eSpade service, 'Raglan Soil Landscape' (espade.environemnt.nsw.gov.au) who classify the soil and land capability as Class 2 and Class 3".

"For more than 30 years now, this site has been intensively managed as it is today. If the land was not capable of sustaining such management, we would observe clear evidence by now. To say the land has only "moderate to moderately low land capability", I believe, is erroneous".

SAMPLE SELECTION

"Whilst I was not invited to attend the actual soil sampling / assessing of the site when it was conducted, one wonders why the south-western quarter (figure 6-28) of the property has no data reported. Check sites were supposedly conducted, but nothing has been presented. It should be noted also that soil sampling site 1 is taken in nearly the lowest point on the whole site in the middle of the farm's main drainage line. From observations and analysis of neighbouring land adjacent to this south-western area, it may be that this is some of the best and well drained productive soil on the site. It may well have been classified a different land class, with different soil properties, had it been sampled/reported.

"WATERLOGGING"

The results from the Land and soil classification, and cited in the EIS, has strongly referred to 'Hazard 6 – Water logging' to downgrade this land to Class 4. Within this hazard category is the subjective assessment of how long (duration) waterlogging occurs, and how frequently it happens (figure 2 – Table 14, taken from The land and soil assessment scheme - OEH). For Class 4 to be determined, this infers the soil is waterlogged for at least 2 – 3 months at a time, approximately every 2 to 3 years. It would take 2 to 3 site visits each year to determine if such waterlogged conditions were still present at each respective visit to make such a classification. I am unaware of that procedure occurring.

> *"I am also aware of pictures taken 10 days after another extreme rainfall event, during the night of November 13th 2022. Rainfall records to 9am on the 14th November 2022 for the Bathurst Airport show 86.4 mm fell. These pictures clearly show some Class 1 land (with irrigation) with ponding/short term waterlogging, while pictures of the proposed site, on the same day, show no such water logging present. The site is obviously draining better than reported in the EIS".*

71. In addition to Mr Harbison criticisms of the quality of the SLR assessment Mr Richard Ivey, Agricultural Consultant, also adds his criticism. He observes:-

> *"In our opinion, the SLR assessment of LSC is deficient in that it does not show that SLR have followed the guidelines for assessing LSC. The SLR report does not set out its assessment of each criteria required to assess each hazard, and does not state how the decision tables were used to assess the LSC class under each hazard.*
>
> *In addition, the assessment appears to be based on an inadequate soil survey program. Table 3 of the SLR report refers to a 1:100,000 survey density target, or a minimum of 3 sites. However, the solar energy guideline2 requires an inspection density of 1 site per 5 to 25 hectares. This is equivalent to 7 to 37 sites. However, the SLR assessment involved only 4 "laboratory analysed" sites and only 6 "detailed sites" (including the "laboratory analysed" sites).*
>
> *The survey density appears insufficient to accurately determine the LSC of the site."*
> (See Document 13: Tremain & Ivey Advising Report 12.12.2022)

72. Recent practical observation that goes to the quality of the subject land, in particular it's drainage, is set out in a statement from Mr John Armstrong, dated 13.12.2022 (See Document 36: Mr J. Armstrong Statement). In summary he reports having sprayed a significant portion of the subject property on 1.12.2022. He of course used heavy equipment. He reports having experienced no difficulty, such as bogging or inability to reach areas because of dampness, thus attesting to the fact that there is indeed no drainage issue on this land.

73. We now refer to the Proponent's brochure, published before any land investigation. Of course Class 1 land is just one of three classes (1, 2 and 3) in the highest category, those three are all in the category singled out by the SPA for protection. They are

collectively described as 'the highest quality land'. Other classes 4, 5, 6, 7, 8 are in different SPA categories.

It is incorrect to suggest the subject land was 'not described as highest quality agricultural land'. It was so identified by the Department of Planning, Industry and Environment. It was so described by the Department, identifying it as Class 2 and 3 land.

No doubt the Proponent's agenda, programmed before it had 'turned a sod' on this land, was to seek to categorise it differently. It was attempting to categorise it in such a way as:-

a) Defied the history of this land;

b) Defied its grain production that extended back as far as memory, over 70+ years

c) Defied the Department of Department of Planning, Industry and Environment's classification for classes 2 and 3;

d) Defied Rural agents and landowners opinions; and experience;

e) Defied farmers' stated experiences; and

f) Defied the very appearance of the land

74. The quality and 'class' of land considered appropriate by SPA for solar projects is land falling within class 4 – 8 (poor quality land), per the Land and Soil Capability Assessment Scheme 2012.

75. Elgin Energy recognise this and note in their EIS "*classes 1-3 are considered important agricultural land and would typically not be considered appropriate for solar farm development without very strong justification*". (EIS pg 163)

76. Having regard to the well supported, and historically consistent classification of the land as class 2 and 3, the Proponents suggested classification of the land is considered 4 and 5 and potentially 6 is with respect, erroneous. For the Proponent's pre investigation agenda, we refer the SPA to paragraph 29 and paragraph 73 above and hereunder.

We note:

- When taking the soil samples Elgin Energy did not obtain local agronomists familiar with the area;

- There was no independent oversight, or peer review in the selection of soil sample locations;

- The sample locations were not located in the southwestern portion of the land, the area identified by Mr Harbison as the most productive portion of the land;

- With respect, there is a material benefit to Elgin Energy obtaining a classification of the land as 4 and 5.

- The Proponent's agenda was explained in its brochure before 'a sod of soil was turned'. It needed evidence that the land it had fixed upon was no identified as highest quality agricultural land. That is to say it was not Class 1, 2 or 3 land even though the Department of Agriculture and others have so classified it. But noting it was land in the Class lower than the classes in the highest category. Its reclassifying agenda was set without any practical investigation

- In its initial brochure, the Proponent so classified this land in terms contrary to the LEP and the Department of Agriculture, and at a point of time when it had not "turned a sod of soil". This we suggest, indicates a lack of bone fides. A conclusion was published by Elgin in its Brochure that appears to be contrary to all informed publications and before it had "turned a sod of soil". Its agenda was therefore, already entrenched.

- This is contrary to experts, photographs and practical experience outlined above. See also photographs taken on or about 1 December 2022 and referred to in Mr Harbison's report (See Document 16: D. Harbison Report Update 9.12.22). We suggest this demonstrates the quality of this land and the falsity of the suggestion of poor drainage.

77. On this basis, we suggest the land classification as 4 and 5 is erroneous. We suggest the use and classification of the land demonstrates it is class 2 and 3.

78. We suggest it is inappropriate to change the use of this highly productive land.

79. The Proponent's research, relevant parts of which are subjective, ought not be accepted by the SPA.

II. Adverse impact upon visual/ scenic quality/ landscape

80. The assessment of the visual/ scenic quality impacts, as they relate to the Infrastructure SEPP are matters for experts. However, we can say:-

a) By way of illustration (See Document 38: P. Bonanno Scenic Quality Statement)

b) Local Real Estate Agents consider the scenic quality of the surrounding areas to be diminished to such an extent as to adversely affect land values.

"having viewed the photographs described as figure 6-7, 6-8, and 6-9, it is my professional opinion that the proposal will have a serious negative impact on the value of neighbouring properties" – Mr Andrew Bickford (See Document 23: Andrew Bickford Second Report 13.12.2022)

[having viewed several photographs at pages 104, 115-116, 118 and 121 of the EIS] *"my unhesitating opinion is that this proposal will have a serious detrimental impact upon the surrounding properties both in terms of value and in terms of production"* – Mr Michael Lund (See Document 21: Michael Lund Second Report 8.12.2022)

c) It is glaringly obvious to any scenic observer that the proposed use of the land is totally incompatible with surrounds. It is a huge waste of excellent land and quite out of place.

III. Inadequate Consultation and "Site Truthing"

81. We suggest that the fixing upon this subject property at this location is relevant to the matter under discussion, and so we report as follows.

82. In its EIS the Proponent asserts "a number of sites were explored for the project but ruled out due to site constraints or low level of landowner interest". EIS page 28, 2.5.1.

83. It may be letters were sent and visits made to assess potential sites as asserted by the Proponent but no rural proprietor or occupier within a 3 kilometres or indeed 5 kilometres radius recalls any such event. Certainly, landowners between the subject site and Raglan substation have so stated.

(See Document 33: Statement from Near Neighbours).

84. We suggest the SPA not accept the Proponent's assertion of such investigations and visits occurring. The only possible exception is the land owned by Mr Bestwick at Brewongle that was the subject of the Photon proposal. We have not checked with Mr Bestwick. It is to be noted that Mr Bestwick is aged 90 years.

85. In any event, by inference, the Lease fee though no doubt substantial, was not sufficient to induce any landowner and so by inference, each owner approached, if approached, had sufficient respect for the land and the environment to reject the Proponents proposal.

86. As to the so called "site truthing" see Scoping Report. In relation to the subject site, we can report that the owner who has never resided in this area and has always resided in Sydney, has always leased the subject block to a rural producer. About 30 years ago a member of our group made contact with the owner, because our member wanted to purchase the subject land, and indeed he Leased the land, for a time, with the hope of purchasing it.

87. At a stage the member spoke with the Sydney based landowner. The owner advised that he was not a seller, but rather a land accumulator. He advised he purchased the subject land before 1984 and wanted to maximise his capital gains tax saving. He went on to say in words to the effect "*I have no interest in the rural scene and indeed Bathurst. I have hardly visited the area since purchasing the property, but I am quite happy to lease the property (to you) but not to sell it*". Our member accepted the landowners fulsome and courteous response and moved on.

88. We suggest the so called "site truthing" is more accurately described in the way we have done in the preceding paragraph.

89. The site is a site with all of the qualities described by the AG but happens to be owned by an ageing owner who has no interest, whatsoever in the rural qualities of the subject property.

90. In fact, no neighbour has, after due enquiry by us, ever met or seen the owner, nor even, as we understand it, has the owner's tenant ever met or seen him. We understand an estate agent travelled to Sydney to meet him on one occasion but the landowner, true to his word, expressed 30 years ago, resisted selling. He is now rather old. No rural retailer as best we know, nor any business, as best we know, knows the owner. Communication is via PO Box. (See also Document 34: Letters to Mr Danziger)

91. Please note that the Proponent, in spite of being informed of the above on several occasions and being advised of the community's concern of likely financial loss to the Bathurst community, insists that he has never raised any aspect of the above with the owner, and so he simply cannot agree or disagree with the above assertions. This insistence has continued through until the last meeting with the Proponent on 20 October 2022.

92. Of course, we are dependent upon the integrity of the Proponent and its apparent lack of interest in the loss of rural income to Bathurst when reporting his insistence of ongoing and self-induced lack of knowledge, referred to in paragraph 87 above.

93. We suggest the so-called consultation and 'site truthing', as asserted by the Proponent, ought be viewed with suspicion. It is inconsistent with the facts.

IV. Expansion of Residential Areas/ Loss of Potential Construction Work

94. It is we suggest incorrect for the Proponent to assert to the SPA that the "*Overall, the size and scale of the change is low and the relative geographic area of the development site is small*" (EIS page 19 and 109). The reverse is the case. With a finite, and relatively small portion of cultivation land in the area, the size and scale of the change is significant relative to the total amount of cultivation land.

    We note the observations of Mr Harbison:-

    "With less than half (42%) of the land use in the Bathurst LGA being used for agriculture, and 95% of that being predominately grazing, areas for crop and fodder production are finite. Behrendt and Eppleston (2011) quote only 31% of the region is suitable for grazing with occasional cropping, and just 11.4% capable of maintaining regular cultivation. This site, with approximately 170 ha of arable land, is a significantly larger contributor to the crop and forage production area of the region when there is only 5% of total agricultural land available". (See Document 16: D. Harbison Report Update 9.12.22)

95. Before 2014, several rural landowners land holdings were permitted to be subdivided and the buildings were permitted on 40 hectare blocks and smaller, and that permission was utilised.

96. Under current zoning (2014) council allows a residence on each 100 ha block. In some circumstances, we understand, two residences are permitted. Landowners have so built.

97. The minimum of 100 ha block was to strike a happy medium between allowing residents and residences close to Bathurst City, on a block the price of which was achievable to people, and at the same time, keeping Bathurst's surrounds, green and rurally productive. No doubt there were other factors.

98. As a result, and with strong compliance, surrounding homes have been built on, or existing ones renovated, all consistent with the capital values one might expect. Clearly more homes are planned with the current zoning.

99. Many, we expect most landowners, have in fact subdivided their blocks into 100ha blocks, some no doubt, for security, others no doubt to sell, and others no doubt, to build for family or otherwise.

100. By illustration, if one takes Brewongle Lane directly to the East of the subject block, there are three blocks on which owners intend, or intended to build.

101. In addition:-

a) 244 Brewongle Lane has on it a home that has been built since 2014. The owners, Sam and Polly Bonanno, hope to build for their children, on their adjoining block.

b) 264 Brewongle Lane, a 30 ha block is owned by Andrew and Jo Petch and family.

c) 462 Brewongle Lane is owned by Evan and Louisa Dowd and family. They also own the block in between the Petch's and themselves, on which they hope to build.

d) 413 Brewongle Lane consists of three blocks, each owned by different members of the Ryan family. Paul Ryan is currently renovating one home, and his son Lachlan and daughter in law live at that address in temporary accommodation and intend to build on their own block at that location. Another son Logan intends to build on his block as soon as he can afford to.

e) 457 Brewongle Lane is owned by Peter Hennessy and he and his wife Denise, reside in the residence located thereon.

f) 461 Brewongle Lane is a new residence and occupied and Leased by David Garcia-Capel.

g) 526 Brewongle Lane has a residence thereon and is a farm-stay.

h) 671 Brewongle Lane is a residence leased by Sheridan Allen, and

i) 673 Brewongle Lane is a residence leased by Grant Welsh.

j) 674 Brewongle Lane has been Leased and is currently being repaired and will in February 2023 be again Leased.

k) 681 Brewongle Lane, Kathy Stewart owns approximately 30 ha

l) 723 Brewongle Lane, Jeff Green owns approximately 30 ha

m) 752 Brewongle Lane, Kerry McFadzean owns approximately 5 ha

102. All of the above named persons object to this solar plant proposal. (See Document 33: Statement from Near Neighbours)

103. As to property values and adverse impacts upon values and houses, I refer to Elders, Mr Bickford, and Master Stephen's, Mr Lund.(See Document 20: Michael Lund Initial Report 1.7.2021, Document 21: Michael Lund Second Report 8.12.2022, Document 22: Andrew Bickford Initial Report 2.7.2021 and Document 23: Andrew Bickford Second Report 13.12.2022) referred to at paragraph 80 (b) above.

V. Adverse impact upon jobs and rural production

104. The location of the proposed solar project will adversely impact the local community through a reduction of local employment and agricultural production. The suggestion this solar plant will positively impact the local economy is denied on the basis profits produced will not be spent/ distributed in the local economy but will be largely extracted out of the region by both the landlord and the tenant.

105. The proposed solar project is proposed on a site of some 186 hectares, with a development footprint of 158ha and will take out of production 179.5 hectares of prime cultivation land.

106. In the course of producing crops, and/or grazing while resting soils, the local economy benefits. Local benefits from the local purchase. This includes the local purchase of grains, fertilisers, additives such as lime, and equipment. Ongoing expenditure includes the employment of local contractors for sowing, harvesting, cutting, and bailing. These benefits are enjoyed locally and annually.

107. To substantiate and quantify these obvious benefits, the AG retained the independent expert advise of Mr Richard Ivey of Tremain Ivey Advisory, Agricultural Consultants (TIA). (See Document 12: Tremain & Ivey Advising Report 19.1.2021)

108. In their report dated 19 January 2021 Mr Richard Ivey made the following observations:-

a) TIA agreed with the assessment of the agricultural potential of the Solar Project area by Mr David Harbison. Mr Ivey took the view that,

> The area is "*capable of supporting an intensive mixed crop and livestock farming system. Such a farming system is typical of that utilised by farm businesses on the lands of similar agricultural potential surrounding the Solar Project area and generally in the Bathurst region*".

b) The Operating expenses are estimated as $126,664. Such expenses include those described at paragraph 106 above;

c) The net cash surplus/ Deficit of the productive land is estimated as $102,050.00;

d) Mr Ivey also notes that "*due to the combination of climate and soils, NSW Far West generally has a significantly lower agricultural production potential to that of the Solar Project area*".

We note the NSW Far West, has within it a number of Renewable Energy Zones (REZ) for this reason.

e) It is concluded, the annual gross income for the Solar Project area is $228,714.00 compared to merely $4,512.00 for NSW Far West (on the same sized land), and "*the gross income for 186ha in the NSW Far West is less than 2.0% of the Solar Project area*".

The loss of this income turnover coupled with the loss of primary production is a significant loss to Bathurst.

109. On this basis we consider the location of the proposed Solar Plant unnecessarily removes highly productive cultivation land from the local community and the broader community.

110. Please also note that the Proponent's brochure makes reference to local jobs. The fact is, however, that the Glanmire Action Group has retained a photographer, printer, public relations officer, film producer, and as you will see, many experts, all locally. The Proponent on the other hand whilst having ample opportunity, has done none of these things. Nothing locally.

The Proponent's failure to retain locals has persisted in spite of the advise given by [redacted] to the Proponent and detailed on this document (see paragraph 50 (b)).

VI. Adverse impact upon property prices

111. As already observed, this land is not to be judge as rural land *simplicita*, but rather real estate and rural land combined. With the rather unique value attaching thereto.

112. Neighbouring properties will be subject to a reduction in land value if this proposal proceeds.

113. In support of this view, are the expert opinions of Mr Michael Lund of PR Master Stephens, Real Estate and Stock and Station Agent with over 12 years' experience in the Bathurst area and also servicing greater NSW, and Mr Andrew Bickford of Elders Rural Services Bathurst with some 23 years of experience.

114. Both Mr Lund and Mr Bickford have provided two Reports respectively which are annexed to this report (See Document 20: Michael Lund Initial Report and Document 22: Andrew Bickford Initial Report 2.7.2021 Document 23: Andrew Bickford Second Report 13.12.2022).

115. We note their following observations of Mr Lund:-

a) "*The proponent suggests that there is no evidence that a solar project (such as the one proposed here), has an impact on the value of adjoining nearby rural properties. There is in my view, no point in debating that broad statement because I am confident it simply has no relevance to the proposal located at the proposed site*".

b) "*my unhesitating opinion is that this proposal will have a serious detrimental impact upon the surrounding properties both in terms of value and in terms of production*".

c) "*I adhere to the view that it is productive cultivation land*".

116. We also note the comments of Mr Bickford:-

a) "*This land is located on the perimeter of the growing city of Bathurst and is of the highest quality, both in terms of its long standing agricultural productivity, and its high residential value*".

b) "*Predating, and throughout the entirety of my career, I and professionals within the local and surrounding area have described this area of Bathurst as the "green triangle" - Bathurst's most highly regarded agricultural land*".

c) "*Recent residential developments have further increased the value and desirability of these properties*".

d) *"Having regard to my 23 years of experience, familiarity with the area and the local property market, and having viewed the photographs described as Figure 6-7, 6-8 and 6-9, it is my professional opinion that the proposal will have a serious negative impact on the value of neighbouring properties"*.

VII. Conflict with surrounding land use

PRIME AGRICULTURAL LAND (CLASS 2 AND 3)

117. The superior quality of the land and its classification as Class 2 and 3 agricultural land has been well considered above (See paragraphs 64 - 79).

118. It remains the case that the imposition of the proposed solar plant on this prime agricultural land, represents a significant conflict with surrounding land use and contrary to the RU1 Primary Production zone protecting land "suitable for regular cultivation".

INSURANCE ISSUE

119. There is clearly a direct conflict between the solar plant, with its substation, battery and other incidental tackle, including a 7 metre high Service Shed (EIS page 44), surrounded by a 2.5 metre fence (or higher), on the one hand, and rural/ residential land on the other.

120. In describing the surrounding land use as rural/ residential, we again highlight the fact that one hundred hectare blocks were fixed upon by the LEP 2014 for the reasons outlined in paragraphs 94 - 103 above.

121. The more glaringly obvious conflict results from an insurance issue.

122. In conversation with your Mr Preshaw on or about 3 September 2021 and in an email from Mr Preshaw dated 5 December 2022, Mr Preshaw consistently advised… "

> *"I note insurance matters are not governed by the planning system under the Environmental Planning and Assessment Act 1979. As such, concerns around public liability insurance are beyond the scope of the Large-Scale Solar Guidelines finalised earlier this year by the Department of Planning and Environment (the Department)."*

We respect his views.

123. We appreciate and respect Mr Preshaw's views. However, we wish to at least set out the insurance issue as we see it, while still appreciating that Mr Preshaw is inclined to a view that it is a matter for the Legislature and not the Planning Authority (Executive Government).

124. We also refer to the constructive conversation with SPA's [redacted] and [redacted] held at Brewongle on or about 4 August 2022. At that time, the AG's insurance issue was understood by the SPA for the first time.

125. In any event, to make it clear we do not seek to submit the solar plant needs to insure for public liability or otherwise. For the sake of this submission, this does not interest us.

126. We seek to submit the conflict with surrounding land use by the introduction of an estimated $152 million dollar asset, at or near, the surrounding land, renders the surrounding landowner unable, in reality, to obtain public liability insurance to protect him/ her/ it at all, or sufficiently, thus resulting in effectively putting the surrounding land user out of business.

127. In a rural enterprise, particularly a rural enterprise that includes harvesting activities, the risk of fire is real. We reference documents as follows:

a) (See Document 17: Erika Dawson Bushfire Expert Report, 7 December)

"In my opinion the solar farm site and its surrounds should be classified as Category 3 Vegetation as it comprises grasslands that is not maintained in a managed scale (for the purpose of considering bushfire hazard) and cropping observed as being intermittently carried out and cannot be reasonably excluded from being bushfire prone land on that basis".

"Grassy fuels are capable of being ignited by very small embers or particles when the moisture content is below 6%. In these conditions fires can be ignited by activities that would otherwise not cause ignition, such as "glowing carbon particles from defective exhausts…grinding operations and metal striking rock during the operation of slashers or bulldozers".

b) (See Document 18: Graham Swain Fire Report 5.12.2022)

"Fire has the potential to commence on the land surrounding the site on which approval is being sought to construct the Glanmire Solar Farm. Ignition sources include farm machinery, welding, cutting, grinding, vehicles, cigarettes and lightning. Catastrophic fire events can result in large scale bush/grassland fires (including standing crops) spreading across the landscape for many kilometres".

"There is no reason that a similar fire event will not occur in the landscape surrounding the solar farm and cause damage to the solar arrays and associated equipment. The predominant fire paths likely to impact the solar farm site is from the northwest, west and southwest – refer to Figure 1"

Figure 1 – Plan of potential fire paths likely to impact the Solar Farm site.

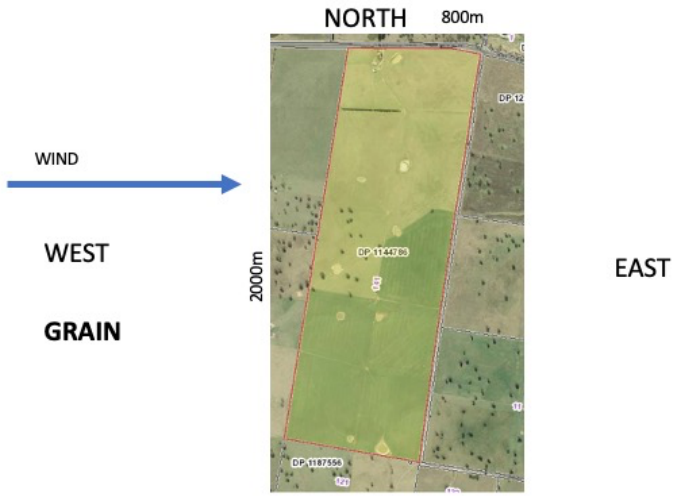


The pursuit of rural activities in a setting where the prospect of fire is real and the liability for damage is so extensive, the health and well-being impact upon the farmer and his/her family is likely to be most significant indeed.

(See Document 17: Erika Dawson Bushfire Expert Report, 7 December and Document 18: Graham Swain Fire Report 5.12.2022)

128. We invite the authority to consider the basic facts as follows:-

Wind Direction Representation



a) You will note that the two North/South running boundaries are in excess of 2000 meters in length. The East/West boundaries are in excess of 800 meters.

b) The landowners on the western boundary and indeed on the Southern boundary are rural producers, and the one on the Western boundary, places emphasis on grain production.

c) The prevailing summer wind is from the West/ North West/ South West.

d) Harvesting occurs in the heat of summer, normally at a time of high fire danger.

e) The proposal is to construct, in this rural and in particular grain producing location, a solar plant expressed to be $153 million dollars, and expressed to generate 60Megawatt (ac) power.

129. We ask the SPA to ask itself "if I was an insurance company would I agree to the Western neighbour increasing his public liability from $20 million (the standard cover for farmers) to $153 million dollars or more (to cover not only the risk, but the unknown potential claim for loss and clean-up etc.

The answer must surely be:-

a) As a prospective insurer I am entitled to know the increased value of the adjoining structure; and

b) I wouldn't insure the risk, or my premium would be very high indeed.

130. These questions were asked of an independent insurance broker, Mr Craig Mizon who reported just that. That is to say:-

a) An insurance contract, described as a contract of the utmost good faith, to disclose the interest of such a solar plant;

b) One would be unlikely to locate an insurance company to take on the public liability risk; and

c) If one did locate a willing insurance company, the premium would be prohibitively expensive.

131. Mr Mizon's report, in accordance with the frankness the SPA encourages, was provided to the Proponent.

132. In due course the AG was provided with a document, not on any letterhead, but rather on a document produced by the Proponent that simply says as follows:-

> *"Insurance premiums are developed among many considerations on risk factors relevant to any specific property. As data and information develops, those risks may be alleviated or escalated and premiums applicable would be applied according to each insurer's determination on that specific location. There is no sole or single position on pricing or risk, each insurer will determine and apply their own risk framework, acceptance criteria and pricing model. While there may be a factor with one or some insurers, in a specific region or at a specific location, that will be an individual organisation position, it is not an industry position. Risk determination is complex and is property specific and applied individually by insurers in line with their own positioning. … there is no position known at this time indicating or highlighting any widespread increased risk relevant to a property neighbouring or being near a solar farm or facility".*

133. We suggest the purported response is not an appropriate response. This fact was drawn to the Proponents attention several times, including at the CCC and at the 20 October 2022 at Keystone 1888 meeting. Nothing further has been provided.

134. The fact is, the position is, as outlined by us.

135. Clearly the history provided to Mr Mizon, and the State Planning Authority was not provided to the Australian Insurance Council. Rather clearly, however, the correct question was not provided to the Australian Insurance Council, and so the Council's comments are of no assistance.

136. As to whether the information was deliberately withheld or was a result of being provided by someone ignorant of the need to in fact address the real insurance question, is irrelevant. The fact is, the history given to Mr Mizon, and in respect of which Elgin was invited to disagree, if it saw any error in it, was not given to the Insurance Council.

137. This in fact, puts at risk rural activity, most certainly grain production, and likely, in all other respects. Further, the prospect of obtaining a contractor, who has relevant insurance cover would we suggest be negligible, and so again, the prospect of obtaining a contractor would be extinguished.

138. Even if one found a landowner so irresponsible as to put his rural property at risk, by not having insurance, or adequate insurance, the position is that if in fact that landowner happens to be farming on a property where other family members, for example, have a proprietary interest and/ or there is a relationship of trustee and beneficiary between the operator and proprietor, it would be reprehensible, and I would suggest illegal for the operation to continue.

139. Any suggestion that the Proponent won't sue, is not an answer.

140. The suggestion that a Proponent might require a later owner of the site, not to sue achieves nothing. Such agreements are *in personam*. They are not propriety registrable restrictions. Of course, the suggestion that a Proponent would require its insurance not to sue is fanciful.

141. Of course, we all understand that climate change exacerbates the risk of fire.

142. Recent events with flooding etc, have nightly on television, highlighted insurance issues that arise. The government must surely be conscious of these matters when deliberating upon this application.

143. To pursue this proposal in a fertile grain producing area, is we suggest, endeavouring to place a "square peg in a round hole".

144. The answer may be to go onto poor ground. The answer may lay in a variety of ways, the more obvious of which, is to place solar plants with compatible industries, for example in Renewable Energy Zones. There seems to the writers, to be no reason an insurer could not enter into an agreement, similar to "knock for knock" motor vehicle

insurance company agreements. But the prospect of a solar insurer entering into such an agreement with an agricultural insurer, is we suggest negligible.

145. The problem of allowing this proposal at this location from an insurance perspective, is we suggest, an insurmountable problem. It is tantamount to stopping cropping and/ or rural activity on surrounding properties.

146. Of course, if for example any western neighbour was to plant trees, either as a native corridor or otherwise, the fire risk to which we have referred would be likely to be exacerbated, by for example, increasing radiant heat on the arrays and extending the spotting distance, further than otherwise into the solar block with its width of only 800 meters (See Document 18: Graham Swain Fire Report 5.12.2022).

WATER ISSUE

147. There are significant, unaddressed concerns in relation to the Proponents intention to remove dams for the life of the project. With no opportunity for water capture, increased overland flows will occur, spilling on to neighbouring properties and increasing erosion.

148. Mr Harbison observes the following:-

> *"Removing [dams] will increase overland flows to neighbours land, highly likely to impact on whatever production system is being conducted. Further, increased water flows and intensity will likely cause greater erosional forces. With the erodibility factors already noted, this will not only increase erosion on the site as water concentrates into the natural water lines, but will then leave the site with greater velocity into neighbours land. There are claims the 'reduced' stocking will lead to greater infiltration of water on the site. One cannot claim poor drainage and waterlogging for the benefit of land classification and then allude to greater infiltration as a benefit on the same ground! Shading by solar panels will limit plant growth at times of the day/month/year and grazing on lesser covered and drier soil will increase compaction. Both of these attributes may well lead to increased surface run off in contrast to the claimed 'increased infiltration'".*

(See Document 16: D. Harbison Report Update 9.12.22)

149. The inconsistency of the Proponent's view as to the quality of the land is evident. We suggest, the Proponent has failed to address this issue.

SOIL EROSION AND CONSEQUENCES

150. The AG, and Agronomist Mr Harbison, are significantly concerned about the short and long term consequences of the "significant disturbance" to the soils during the construction of the project. This concerns is three-fold;

(1) Should any intense rainfall event occur at any stage (such has occurred repeatedly these last three years) while the soil is disturbed erosion is likely;

(2) The soil analysis by SLR on the subject land does not appear to identify where the sodic layers commence. This is therefore an unidentified and unmitigated risk in the construction phase; and

(3) The Proponent intends to use Gypsum at significant rates as an ameliorant to sodic soils. As a consequences the sodium solution (gypsum by-product of dissolving in water) will move with the water movement – i.e. on to neighbours, increasing salinity over time.

151. The Proponent suggests "*these risks are well understood for the site, with reference to baseline soil surveys, ground truthed land soil capability mapping and remediation strategies*" (EIS page 200).

152. Mr David Harbison observes:-

> *"The soil analysis identifies if sodicity is present in the layers that were analysed. However, analysis of all depths was not conducted, which means identifying where the sodic layers commence is not possible. Yes, it does appear to start in the A2 horizon, but at what depth does this A2 horizon start. The analysis doesn't report the 10-20cm zone. Some of the 20-30cm layers contains sodic soils (> 6% sodium – actual levels 8% and better) which gets quite significant with depth in the 65-75cm layer. Here, sodium levels are up to 17%.*
>
> *With trenches proposed to be dug to 1m, this is 33% deeper than any depth there is physical and chemical data reported for. Not knowing what soil properties exist in the full depth of trenching is, quite frankly, beyond belief".*
>
> *"Gypsum is a known ameliorant of sodic soils and its' proposed use at significant rates is noted. How gypsum 'works' is by the calcium ion (Ca++), on wetting of the gypsum, dissolving into solution. Ca++ then outcompetes the sodium ion (Na+) for a 'place' on the clay complex and attaches in sodium's place. This leaves Na+ in solution which now moves wherever the water moves.*
>
> *Again, given the reported waterlogging and poor drainage attributes of the site, this sodium, remains in solution. Where it end ups is where ever the water goes, ie into the neighbours!! Longer term and over the life of the proposed project, it is most likely to gradually increase the sodicity of the surface soils of the adjacent paddocks owned by neighbours. Does increased sodicity cause production losses and other degradation of soils, yes. Neighbours will inevitably be disadvantaged by rising sodicity issues of their soils whilst ever there are elevated Na+ ions in solution of the water that leaves the proposed site.*
>
> *As a 'safeguard' to any of the above occurring, soil layers would need to be measured and isolated according to their sodicity content during excavation, and then replaced to the same depth as the trenches are filled. No amount of 'dispersive' and erodible soil can remain on the surface as this will just become an erosion point of the future, and a source of Na+ ions".*

153. Again, the inconsistency of the Proponent's view as to the quality of the land is evident. We suggest these identified, and significantly, <u>unidentified</u> risks have not been addressed by the Proponent, and conflict with neighbouring land use.

154. We suggest, the Proponent has failed to address this issue.

WEED MANAGEMENT

155. The Proponent has correctly identifies the spreading of weeds as a risk, however, there are inadequate assurances as to their proper management, and/ or the management practices that will be used.

> *"At this point in time, I am of the understanding that weed management of the site is conducted chemically, by broadacre boom spraying. Such will not be possible for the future under a solar farm. So how will assurances be given to neighbours that weed control will be maintained? Weeds travel by wind, water, livestock, machinery etc. All these processes are likely to continue, and potentially some increase, and the flow of weeds will widen. Such a risk would add significant cost to a neighbouring business, both in time management to control such and the physical expense to do it"*

– David Harbison (See Document 16: D. Harbison Report Update 9.12.22)

156. We suggest, the Proponent has failed to properly address this issue

IX. Adverse social impacts / tendency to divide a united community

157. The Proponent acknowledges that the potential for adversely impacting community cohesion at a local level is a "high significance adverse impact" but assess the impact following the implementation of their Stakeholder and Community Engagement Plan to reduce the impact to "low impact" (EIS page 231). The AG considers the assessment as "low impact" erroneous and inconsistent with the experience of 'near neighbours' and the broader Bathurst community.

158. In relation to the 2017 Brewongle Proposal, a close knit community that included several family members (all nearby residents) has been split and that division has continued to the present time.

159. In addition, there was serious health impacts, and an example of this private and personal matter is provided (See Document 7: P. O'Hara Personal Health Impact).

160. As to this community, an illustration of the pre-solar proposal community quality is as follows:-

(a) At the initial meeting with Elgin, referred to in paragraph 25 and following, there was attending within our group, and most memorably two rural workers. They had been within two months of the meeting, involved in a most serious accident that, to one, was life threatening. He was airlifted to Westmead Hospital. He sustained serious head and orthopaedic injuries, was unconscious for was in an induced coma for about six days and then only partially conscious thereafter for several days.

(b) One of the two was still in a most serious medical condition at the time of the initial meeting with Elgin in November 2020.

(c) By that time, local neighbours had agreed to endeavour to rehabilitate both of them, and in fact, had already embarked upon that course.

(d) In the years that have followed, nine members of the community, namely – Mr Waterhouse, Sam and Polly Bonanno, Andrew and Joe Petch, Evan and Louisa Dowd, Peter and Denise Hennessy, provided the two with graduated work, in particular, the one with the more serious injuries, all in conjunction with his medical and rehabilitation specialists.

(e) They are now both well and work locally.

161. This appearance and our groups dedication to ensure their rehabilitation was described at the initial meeting by the Proponent as “awesome”. The fact is, however, that at any meeting since then, no question has been asked by the Proponent as to their welfare or wellbeing, such is the level of the Proponent’s engagement with this close community.

162. The impact on project proposals such as the subject proposal is felt both directly on neighbouring properties/ communities, and also the broader Bathurst community.

X. Adverse impact on health and wellbeing

163. On the occasion of the authorities most helpful and courteous visit on 4 August 2022 and referred to on page 15, the SPA may have received information from one of the attendee’s on her apparent medical state. She did explain to Ms Brewer the huge detrimental impact upon her mental well-being which extended to her physical well-being. (See Document 9: P. Bonanno Health Impact). She has been receiving treatment, but has deteriorated since the time of the document noted. We are currently asking that she obtain a report to outline this private matter, to include in these submissions.

CONCLUSION

For the reasons outlined in paragraphs 64 - 163 and included in all of our documents attached, we ask the State Planning Authority to accept our AG’s opposition to the proposal and reject the Proponent’s application.

7: ENVIRONMENTAL IMPACT STATEMENT CLAIMS – GLANMIRE ACTION GROUP'S RESPONSE

We now consider the statements as set out in the EIS. This is principally to be responded to by our retained experts. Any absence of comment is not indicative of our approval or agreement:-

1: INTRODUCTION (PAGES 1 – 11)

1.2 Applicant Details:

See our earlier comments. This is the first time this information has been disclosed.

Media outlets have sought, and sought from the AG, [redacted]s contact details to seek responses over the years, all as far as we are aware without success. Its registered office has moved from Queensland to Darlinghurst to Melbourne to Darlinghurst, and now apparently back to Queensland. It appears to have no phone domestic email address, nor provides a domestic contact phone number.

1.3 Project Overview:

As to bullet points 2, 3, 8 and 9 (EIS page 4), we aspire to similar objectives but take issue with the suggestion that the subject project will achieve those objectives and reject any suggestion this project achieves such objectives. We note in passing on page 7, the Proponent makes reference to a security fence around the site "approximately 2 metres high with barbed wire topping or similar". This of course means a fence of 2.5 metres in height or more allowing for one or two barbed wire strands. It is also to be noted the Proponent makes no reference to its infrastructure that includes a 7 metre high service shed (EIS page 44).

1.4 Background:

As already observed, preliminary community consultation was relevantly non-existent.

Ongoing engagement was and is in the same category.

As already observed, we came to learn that Elgin was not and is not to be trusted to engage in frank exchange or the sharing of information. Examples of this are outlined on paragraphs 25 - 60 of this document.

Conversely, information it gained from the community was principally through the AG's petition (See Document 1: Petition). As the residents within the three kilometres radius, and indeed a five kilometre radius, there was near unanimous opposition to the Proponent's proposal, and of course so many other members of the community also signed the petition. Indeed it was rare for any person approached to not sign and the objections were firm and resolute as is clear from the revisits and confirmations detailed in Document 33: Statement from Near Neighbours.

All of this is in clear contrast with the Proponent's study and consultation claims detailed in its EIS and commented upon in paragraphs 25 - 60 of this document.

The procedure was that a group member or acquaintance would take to a resident the petition, together with the Proponent's brochure and the AG's brochure and would be invited to read both and ask any questions. Thereafter the petition was signed. To seek to dismiss the petition as 'generic' whatever that term means in the context in which it was used, we suggest that each person who signs was relevantly informed.

As may be seen from this document so far, we submitted to the Proponent our expert's reports in a timely way.

There has been no timely reciprocation or sharing of information from the Proponent. Upon enquiry from our experts there has been no contact with any of them, contrary to suggestion by the Proponent (see EIS page 82 "*The Project team's technical specialists have shared information with the specialists engaged by the Glanmire Action Group where requested*").

2: STRATEGIC CONTEXT (PAGES 12 – 33)

The AG denies that the project demonstrates how the Glanmire Solar Farm aligns with the regional and local land use plans.

2.2.1. BATHURST REGIONAL LOCAL ENVIRONMENTAL PLAN 2014 (BATHURST LEP)

We agree the subject land is zoned RU1 Primary Production under the Bathurst LEP.

The land has been, for as long as people can recall, grain producing country and cultivated, maintained and enhanced as such. It is inappropriate that it be shutdown to such production for 40 years.

The proposal achieves the opposite to encourage sustainable primary industry production.

We consider the objective of the zone having regard to the proposed solar plant:-

> ***To encourage diversity in primary industry enterprises and systems appropriate for the area***
>
> Diversity in primary enterprises and systems, appropriate for the area has been practiced for many years, but with the perceived certainty in 2014 following the introduction of the LEP, diversity of primary industry has accelerated dramatically.
>
> A small property in the immediate vicinity is used as a boutique horse stud. The other properties, being 100ha blocks have been the subject of extensive conservation, improvement, fencing, tree planting etc, together with homes consistent with the value of the properties. These are the primary industry enterprises, and these the systems encouraged by the plan.
>
> The introduction of a Solar Plant will disincentivise further residential development and boutique rural production in the area through decreased property values, increased/ prohibitive insurance liabilities, and diminished scenic value.

We suggest the proposed Solar Plant is inconstant with this objective.

To minimise the fragmentation and alienation of resource lands.

Of course, resource land should not be alienated. This resource land has been established as such by the Department of Planning, Industry and Environment, Mr David Harbison (Agronomist), and through the experience of local real estate agents and farmers in the area, to be Class 2 and 3 land.

The subject land is not small in comparison with similar agricultural land in the region. Having regard to the limited amount of cultivation land in the region, its size should be regarded as significant.

We therefore disagree with the Proponents opinion that "*Overall, the size and scale of the change is low and the relative geographic area of the development site is small*" (EIS page 19 and 109).

We note the observations of Mr Anthony Daintith, Town Planner, (see Document 19: Anthony Daintith Report 14.12.2022) who observes:-

> *"While the area of agricultural land taken up by the project is relatively small on a regional scale, the comparison of the project site to the Central West Orana Region on page 186 is inappropriate. This region extends from the Lithgow area in the eastern tablelands to the Bogan Shire in the western plains. Therefore, the comparison that the project site represents 0.0006% of the agricultural holdings within the Central West Orana Region is meaningless.*
>
> *A more reasonable regional comparison would be to the Bathurst LGA, or to the central tablelands area. The project area is approximately 0.1% of the total agricultural land in the Bathurst LGA".*

The introduction of a solar plant will prevent for 40 years, the construction of two homes, the pursuit of the Bathurst LEP 2014 aspirations and will alienate resource land.

We suggest the proposed Solar Plant is inconsistent with this objective.

To minimise conflict between land uses within this zone and land uses within adjoining zones*.*

The installation of the solar plant, will we suggest, maximise conflict between land uses within this zone, and land uses within adjoining zones.

Examples of this conflict include:-

a) The conversion of Class 2 and 3 cultivation land to an alternate an inappropriate land use suited to land of Class 4 – 8

b) Negative impact on surrounding property values;

c) Unnecessary reduction in local agricultural production, with negative impacts on rural contractors, suppliers, and agricultural services;

d) Soil erosion during construction;

e) Increased waterflow over properties (removal of dams) into neighbouring properties increasing erosion throughout the life of the project;

f) Increasing neighbouring salinity due to the introduction of gypsum/ and or the "significant disturbance" to the soil;

g) Inadequate weed management;

h) Prohibitive adequate insurance for neighbouring properties and/ or severe/ catastrophic underinsuring.

We suggest the proposed Solar Plant is inconsistent with this objective.

To maintain the rural and scenic quality of the land.

We refer to the observations of Mr Andrew Bickford who stated:-

> *"This land is located on the perimeter of the growing city of Bathurst and is of the highest quality, both in terms of its long standing agricultural productivity, and its high residential value.*
>
> *Predating, and throughout the entirety of my career, I and professionals within the local and surrounding area have described this area of Bathurst as the "green triangle" - Bathurst's most highly regarded agricultural land".*
>
> *"having viewed the photographs described as Figure 6-7, 6-8 and 6-9, it is my professional opinion that the proposal will have a serious negative impact on the rural and scenic quality of the land and consequently, on the value of neighbouring properties".*

The imposition/ introduction of 186ha of Solar Panels, Battery Storage Facilities, Substation, a 14m x 12m x 7m storage shed, operations building, and 2.5m high perimeter fencing is anathema to the existing rural and scenic quality of the land.

We suggest the proposed Solar Plant is inconsistent with this objective.

To provide for a range of compatible land uses that are in keeping with the rural character of the locality, do not unnecessarily convert rural land resources to non-agricultural land uses, minimise impacts on the environmental quality of the land and avoid land use conflicts.

The subject proposal on this quality land at this location does we suggest, the complete reverse to the LEP stated objectives.

It is agriculturally, aesthetically, environmentally, commercially (insurance), incompatible with surrounding land owners and unnecessarily converts 200ha of productive cultivation land into non agricultural land.

Mr Anthony Daintith, summarises the conflicts with the LEP's objectives well:-

"*Based on an assessment of the objectives of the zone, it can be concluded that the proposed solar plant:*

- *Does not encourage sustainable primary industry production (there will be a loss of 140ha of prime "Class 2 & 3" agricultural land. The land has historically been cropped with a variety of grain crops along with grazing of livestock.*
- *Will lead to conflict between non compatible land uses.*
- *Is not a compatible land use that is in keeping with the rural and scenic character of the locality.*
- *It will unnecessarily convert rural land resources to non-agricultural land uses.*
- *The scenic quality to the "gateway" entrance to Bathurst will be negatively impacted by the construction of the solar farm. The entry is characterised by open farming land and then the Bathurst urban area with the famous Mount Panorama in the background that provides an ideal backdrop to the landscape that is synonymous with Bathurst.*
- *The picturesque and productive locality is very much part of Bathurst's beauty and heritage and deserves protection.*
- *The claim in the EIS that that there would actually be some improvement in the landscape character in the vicinity of the site due to the revegetation and planting of trees on the site is considered offensive to the large number of surrounding land owners.*
- *It will take a significant period of time for any landscape buffer to take any effect"* (See Document 19: Anthony Daintith Report 14.12.2022)

In summation, we suggest the subject proposal achieves the opposite to all the zone objectives.

2.2.2. DRAFT CENTRAL WEST AND ORANA RENEWABLE PLAN 2041:

As to *"Other objectives"* we say it seems pointless to express an objective of protecting agricultural values and promoting agricultural innovation etc whilst at the same time proposing the reverse on this proven cultivation land.

2.2.3. BATHURST COMMUNITY STRATEGIC PLAN:

There is no doubt renewable energy is an important action area. This does not, with respect, support the proposition that a solar plant ought to be placed at the location under consideration.

The site is located in a relatively well populated rural location in which residential development has been encouraged but on 100 hectare blocks in an effort to allow

residents to maintain rural activity and a green belt, residential expansion has been limited to 100 ha blocks. See paragraphs 94 – 103 above.

In reality, however, this means that within a reasonably foreseeable future there will be:

(i) A real expectation of two more houses being built on Brewongle Lane and opposite the subject site, one more house being built on the adjoining property and south of the adjoining site, two more houses at Brewongle Lane at the Ryan's, one more home at 526 Brewongle Lane, and one more home on the Dowd's block at 462 Brewongle Lane and of course the loss of the opportunity of two homes on the subject site. All of this is consistent with developments since 2014 and with the LEP's stated objectives, residence/residences on 100 hectare blocks.

(ii) All reasonably required for family or for rental. Rural residential aimed at accommodating owners, tenants and family. For example, on the places mentioned on paragraphs 94 - 103 at least three homes are rented permanently and others from time to time.

(iii) This proposal seems to us, with respect, to seek to reverse the Bathurst Community Strategic Plan and to seek to occupy two building blocks and a significant portion of green belt cultivation land at a most conspicuous location.

(iv) Town planner to deal in particular with reference to future employment and expansion in the raglan area see EIS page 15.

2.2.4. LOCAL STRATEGIC PLANNING STATEMENT

That the proponent aims to *"…utilising land not considered to be highly productive"* simply seeks to defy all reasonable evidence as to the quality of the land.

The issue of soil quality and its classification as Class 2 and 3 is well traversed.

2.2.6. RENEWABLE ENERGY AND REGIONAL CITIES TISEPP:

It is noted *"A Consent Authority must not grant development consent unless it is satisfied that the development:*

(a) is located to avoid significant conflict existing or approved residential or commercial uses of land surrounding the development, and

(b) is unlikely to have a significant adverse impact on the region's regional cities:

(i) capacity for growth; or

(ii) scenic quality and landscape."

We suggest the proposal runs contrary to both.

In relation to (a) we have identified significant conflict between existing and approved residential and commercial uses of the surrounding land, which is summarised at paragraphs 64 – 163 and pages 43 – 44 above ((a)-(h)).

In relation to (b)(i) we have identified at paragraph 94 - 103 above, a number of properties with building entitlements, who intend/ intended to build prior to the proposed solar plant at the subject site. The imposition of the solar farm, which negatively impacts property values, has caused landowners to reassess the suitability of further residential development.

In relation to (b)(ii) the detriment to the scenic quality and landscape has been fully considered at paragraph 80 and below at page 56.

2.4. Environmental and social, key values risks and hazards

In reference to item 2.4.3 and the description of the subject land's capability as "*moderate to moderately low land capability",* Agronomist, Mr David Harbison observes:-

> *For more than 30 years now, this site has been intensively managed as it is today. If the land was not capable of sustaining such management, we would observe clear evidence by now. To say the land has only "moderate to moderately low land capability", I believe, is erroneous"* (See Document 16: D. Harbison Report Update 9.12.22)

Our arguments as to the soil's classification as Class 2 and 3, and of the subject land's capability has been well traversed.

2.5. Project Alternatives

We dispute whether "feasible alternatives" were considered, including alternative sites and scales of development.

There is nothing in this section that indicates that alternative sites with less impact on agriculture and visual amenity were properly considered.

We note that several solar farms have been proposed in NSW for lower rainfall non-cropping cites with agricultural productivity 30 to 50 times lower than the Glanmire site.

2.5.1. ALTERNATIVE SITES AND SCALE

The AG has identified five landowners between the subject site and the Raglan substation. All landowners object to the Proponent's proposal.

All landowners deny their land being explored for the project.

The so called "site truthing" in relation to the subject site has already been explained. paragraphs 81 - 93 of this document.

Site Evaluation

We refer to Table 2-1 “Site evaluation” at page 29 of the EIS:

“**suitable land**” - we deny the land is compatible with existing adjacent land uses.

“**community support**” – we deny broader community sentiment has been generally positive and supportive of any solar plant at the subject location.

We do not take issue with any suggestion that the general community sentiment is in favour of renewables.

“**Proximity to regional cities**” – we do not agree the Proponent’s SEPP has demonstrated the project:

(a) is located to avoid significant conflict etc; and/or

(b) is unlikely to have a significant adverse impact.

The AG suggests the reverse is the case (See Section 6 of this document above)

“**Important Agricultural land**” – We do not agree with the Proponents assertion that “No high capability land will be affected (Class 3 or above). We suggest the land is Class 2 and 3 land.

“**visibility and topography**” – The slope analysis of the project site appears inaccurate and the claimed impact of slope on the land and soil capability of the site is exaggerated. Figure 6-27 of the EIS purports to show significant areas of the site at between 10% and 20%. However, Figure 1 in the report of Mr Richard Ivey dated 19 January 2021 shows that the steepest areas have slopes of between 5% and 8%. The claimed slope is contradicted by the EIS own description of the project site as "gently undulating" (pages 23, 29, 149 and 159)

“**Natural hazards**” – We do not agree with the Proponents classification of the area as “not bushfire prone”, having regard to the views of Bushfire Expert, Erika Dawson, who is of the view that,

“the solar farm site and its surrounds should be classified as Category 3 Vegetation as it comprises grassland that is not maintained in a managed state (for the purposes of considering bushfire hazard) and cropping is observed as being intermittently carried out and cannot be reasonably excluded from being bush fire prone land on that basis”

(See Document 17: Erika Dawson Bushfire Expert Report, 7 December)

3: PROJECT DESCRIPTION (PAGES 34 - 58)

3.2.1. SOLAR ARRAYS

The Proponent provides a generic description of the proposed array and fails to provide relevant technical information.

It is not possible to comment on the adequacy or inadequacy of the proposed system as it relates to risks such as resilience to bushfire, capacity to handle sheep underneath, and the height and scale of the array.

We suggest this is inadequate.

3.2.2. INVERTERS AND TRANSFORMERS

The Proponent provides a generic description of the proposed inverters and transformers and fails to provide relevant technical information.

It is not possible to comment on the adequacy or inadequacy of the proposed system as noted above.

We suggest this is inadequate.

3.2.2. BATTERY ENERGY STORAGE SYSTEM

The Proponent provides a generic description of the proposed Battery Storage System (BES) and fails to provide relevant technical information.

It is not possible to comment on the adequacy or inadequacy of the proposed system as noted above.

While they indicated Lithium-ion batteries are the current preferred technology, they do not specific that it will in fact be used. We suggest this is inadequate.

Until such time as the BES is specified with relevant technical data provided, it is not possible to properly assess the risk factors, and indeed adequacy, or inadequacy of the mitigation measures the Proponent intends to implement.

The fact the Proponent has “considered” risk mitigation strategies, we suggest, is wholly inadequate.

3.2.4. ONSITE SUBSTATION AND SWITCH ROOM

As noted above, the Proponent provides a generic description of the proposed substation and switch room.

It is not possible to comment on the adequacy or inadequacy of the proposed system as it relates to relevant risk factors.

We suggest this is inadequate.

3.4.3. OPERATION (EIS PAGE 53)

Labour

The Proponent indicates the proposed plant will employ "*up to one to three equivalent full-time staff during the operations period, and would utilise local commercial entities (nearby quarry, local water suppliers and subcontractors) as required*".

The Proponent does not indicate whether the one to three equivalent full-time staff will be based locally. Additional local contracting "as required", we suggest will be minimal during the operation.

The investment/ shared revenue into the community during this 40 year period will be negligible.

This is in stark contrast to the annual productivity of the land under cropping and agricultural production. The current annual revenue is estimated at $228,714.00. Of that revenue, $126,664.00 is expended in operational costs, with significant funds being spent on local contractors, suppliers, and support services.

The fact the Proponent intends to invest in local initiatives to the value of $18,000.00/ year does little to compensate for the loss to the local economy over the life of the project.

3.4.4. DECOMMISSIONING

See above comments in relation to 3.4.3, noting the investment the community greater under agricultural production than the comparatively small "good will" investment in local community groups over a 40 year period.

4: STATUTORY CONTEXT (PAGES 59 – 64)

We refer to our comments set out above at pages 42-47.

We, along with Mr Anthony Daintith (Town Planner) and Ms Erika Dawson (Town Planner/Fire Expert) suggest:-

a) Fails to comply with section 2.42 "land use conflict, future regional growth and scenic quality/landscape" of the State Environmental Planning Policy (Transport and Infrastructure) 2021;

   We note Ms Dawson's view that, "the EIS has not adequately considered the extent of land use conflict, nor has it demonstrated that it has been located to avoid significant conflict with existing commercial (agricultural) uses of the surrounding land…furthermore, many of the measures proposed to mitigate other impacts (i.e. visual landscape screening) will exacerbate other impacts on and of the development (i.e. bushfire) and result in greater land use conflict". (See Document 35: E. Dawson, Town Planner Report December 2022)

b) The project conflicts with every objective of the Bathurst Regional Local Environment Plan (LEP) 2014;

c) Conflicts with the Local Strategic Planning Statement in so far as "*utilising land not considered to be highly productive*"; and

d) Fails to satisfy the requirements of the Renewable Energy and Regional Cities TISEPP.

5: ENGAGEMENT (PAGES 65 – 100)

We refer to our comments set out chronologically in Section 5 of this document.

In reply to Table 5-1 (EIS page 68) we note:-
"**Host Landowner**" - Insofar as the entry here suggests that the host landowner has any interest or input into the area, relationships and/or engagements with anyone in the area, we suggest this allegation is simply wrong. We rely upon the facts set out in paragraphs 87 – 90 and paragraph .

In reply to Table 5-2 (EIS page 72 – 80) we note:-
"**Information stall**" – the Proponent indicates to the Planning Authority that they reached approximately "50 face to face conversation at or near the information stall (and at adjacent stalls).

The AG, in the absence of access to any "completed feedback forms" referred to by the Proponent, have been able to locate 11 face to face conversationalists, each one recorded his or her objection to the proposal and some sought access to a form and completed it accordingly. Document 27: Signed Opposition, Bathurst Show Engagement)

We take issue with the suggestion that there was general positive feedback. We suggest the opposite was the case.

"**Drop-in session at Bathurst Memorial Entertainment Session**" – We refer to our comments at Section 5.

"**Property visits for visual assessments**" – We refer to our comments at Section 5.

"**CCC Meetings**" – We refer to our comments at Section 5.

"**Glanmire Action Group**" – We refer to our comments at Section 5.

"**Community Information session**" – We refer to our comments at Section 5.

Recent Engagement with the Local Community by Members of the AG

Within the past 28 days two or three volunteers, grandmothers in fact, have revisited near all residences within a 3 kilometre radius of the site. Every person visited continues to oppose the Proponent's proposal. (See Document 33: Statement from Near Neighbours).

We can also advise that near all residences within a further 2 kilometre radius were visited and all continue to oppose the subject proposal. As to those beyond the 5 kilometre radius:

All persons have previously signed opposing the proposal see Document 1: Petition, our volunteers contacted many of those and no-one had been contacted by the Proponent.

Referring to page 68 of the EIS we suggest that in regard to the matters outlined above, the Proponent's assertion of some support for its proposal be rejected.

Such allegations by the Proponent are inconsistent with the petition (see Document 1: Petition) that was provided to the Proponent and recently confirmed by the uncontradicted Document 33: Statement from Near Neighbours.

In conclusion our petition with our stated protocol adhered to stands without contradiction and most people who signed confirmed in the past 28 days the views they had previously expressed.

"**Social Media outreach**" - Social media activity undertaken by the Proponent has garnered negligible organic response and should not be considered effective engagement; it is passive at best.

Ten 'people' (Facebook profiles) like the page, 13 follow it - these people could all be employees of Elgin Energy or NGH Consulting. The Proponent's @glanmiresolarfarmnsw Facebook page has a total of 6 posts (3 of which were published on 12 May and received a total of two people responding, one of which appeared to be a questionable profile). No imagery used in the Proponent's social media outreach activities showed the actual site of the proposed solar plant at Glanmire. Only one post showed comments (32) of which a total of 3 comments were positive (from just 2 Facebook profiles).

By contrast the AG current page created in May 2022 has 88 likes and 101 followers. All posts on this page are organic, there has been no boosted content. A singular post had reach of 1347, 151 post engagements, 41 reactions, 12 shares, no negative responses. We suggest this is indicative of the AG's wide support.

The results reported for the social media (Facebook) paid campaign undertaken by the Proponent obfuscate the true nature of engagement with the campaign. The Proponent notes their paid campaign generated '104 likes', but this is erroneous, it garnered '104 post engagements'. 'Engagements' include, reacting to, commenting on or sharing the ad, claiming an offer, viewing a photo or video, or clicking on a link.

Without a detailed breakdown of the campaign post engagement metrics it is not possible to know whether the 21 reactions and 20 comments were positive or otherwise, nor to know who owned the 11 profiles that shared the campaign (effectively boosting the paid reach exponentially).

For full transparency the Proponent should supply a copy of the ad artwork, primary text, headings and descriptions, the details of the ad settings and a breakdown of

reactions/responses, including a copy of comments, and the location and interests of the 11 persons who shared the post.

The paucity of the maximum organic audience reach of 40 for the Proponent's posts cannot be considered 'social media outreach'.

"**Traditional media News coverage**" – with a view to questioning the frankness of the proponent, we refer to the WIN News broadcast clip viewed on 25 May 2022 and upon which the Proponent relies (page 76), in which [redacted] remained in the front seat of his car whilst it was travelling along a road at speed, with his window almost fully up, and talked to his phone screen, refusing to answer any pertinent questions. We have attempted to get a copy of the so described 'news coverage' to demonstrate the falsity of his assertion, however we have been advised by WIN TV Central West that the footage has been archived and is now available via subpoena only.

"**Digital tools**" - We suggest that the Proponent's liberal use of the term 'broader community' and references to 'high level of support' for the Project are an overreach, as the details with regard to the criteria to select the sample used to represent the 'broader community' have not been provided. The Proponent has repeatedly stated that the sample used was 'targeted'.

Through all engagement activities the Proponent was only able to garner 28 responses to its online survey, '59%' of which (16.59 people) the Proponent then gave the blanket label of being representative of 'broader community' for their positive responses. We question why the remaining 41% (11.48 people) were not considered to be representing the views of the broader community of Bathurst.

Six of the 28 online survey respondents (21.43%) do not live in the region. 18% of respondents (5 people) live within 5km of the site. So just 17 people (12 of whom identify as living in Bathurst, but there is no evidence provided to support that assertion) are taken by the Proponent as representative of the broader community in their statements.

5.1.4. SUMMARY OF FINDINGS

Overall sentiment

We suggest that engagement during the preparation of the EIS that there is localised opposition (not mere concern) regarding the proposal. We do not dispute there is a high level of support and encouragement for renewables. We deny there is a high level of support and encouragement from the broader community including Bathurst, for a solar plant at the subject site.

We agree that the strong opposition/ concern expressed by near neighbours was primarily focused on the following topics:-

- Change of land use and the perception that the soil quality is too high to host a solar farm

- Visual change a solar farm would bring, including change the character of the area
- Concern of impacts on property values
- Concern of loss of agricultural outputs
- Concern of impacts on neighbour's insurance premiums
- Impacts to views of potential future dwellings (R44, 44b and 44c)
- The perceived limitation on developing renewable energy Projects within 5km of Raglan due to recent planning policy change

Further we would add that this community enjoys supporting local businesses and reinvests in its land by purchasing rural merchandise for not just rural production but for conservation, tree planting and all aspects of environmental improvement. We suggest the current proposal runs counter to all of these objectives for the reasons already outlined.

We expect that any broader community sentiment tending to support a solar plant at the subject site would indeed have recorded the need to work constructively with near neighbours. The fact is, near neighbours almost universally oppose the Proponent's proposal.

All of this is quite apparent from a three kilometre, five kilometre and broader community Document 33: Statement from Near Neighbours most of which in the 28 days allowed have confirmed the original Document 1: Petition.

Glanmire Action Group

We refer to the comments of the Proponent as set out on page 81 of the EIS, and comment as follows:-

a) The retainer of specialist was in the setting we have already outlined.

b) We deny the sentiments sought to be conveyed by the comments under this heading.

c) We deny the "forms were generic in nature" if it is intended to detract in any way from the thought given by any petitioner. In the short time we have had, we have revisited those people who have all adhered to their original views and reject any suggestion of a lack of thought.

d) We note that the "*Project Team used the issues highlighted and contact details provided in these forms to follow up with residents to better understand their individual thoughts, with limited success due to a low rate of response to the emails and phone calls*" (EIS page 82).

e) We deny the project team contacted relevant residents (within three or five kilometres) for any meaningful purpose.

f) We have already referred to the CCC – see paragraph 46 - 48 above.

g) The groups technical specialists deny any communication from the Proponents "team specialist" as suggested by the Proponent (at EIS page 82 point 5).

h) As to the Proponent's suggestion of the Glanmire Action Group's so described "erroneous assertions", we advise:

> **As to bullet point 1:** At no point as far as we are aware has any member of our group suggested panels "would be placed right next to the Great Western Highway". We suggest this is based upon the Proponent's imagination.
>
> **As to bullet point 2:** Our group can't confidently dismiss the suggestion that the site would be surrounded by a 3m high fence. We note our brochure does not say it, and we also note that in certain places we have referred to a 9 foot high fence, so if we have referred to a 3 metre high fence, we apologise for any problem caused. We should have said a 2.5 meter high fence, the top portion of which will be barbed wire, and we should have added the 7m high service shed. This service shed height does not appear to have rated a mention at any consultation.
>
> **As to bullet point 3:** We most certainly have made this assertion and we have asserted that the Proponents Australian Insurance Council reference, fails to address the issue.
>
> **As to bullet point 4:** We agree the statement has been made. We suggest that it is an understatement having regard to the increase in primary production prices and what we know about the landlord and indeed what the proponent knows about the landlord, but persistently denies knowing.

i) We accept the project team ought to be able to gather a clear understanding of the group's concerns but not through multiple discussions or CCC meetings. As already observed, the group has conducted its own research, and consistent with the SPA's wishes, has provided the documents to the Proponent in a timely manner.

Online Survey Feedback

Twenty eight respondents to a survey should not be taken to represent the Bathurst Region LGA community. There appears to be no integrity to the sample selection, rendering the exercise invalid as a research activity. It is noted that the survey was shared to targeted interest groups chosen by the Proponent.

We do not agree that the opinions of 17 respondents from a total of 28, is representative of the broader community's sentiments on the Proponent's proposed solar plant at Glanmire.

Facebook Campaign Feedback

Minimal effort has been made to engage an online community since the Proponent's Facebook page was published in mid May 2022. The Facebook paid campaign activity undertaken by the Proponent was negligible. The dates of the paid campaign were tied to the Proponent's 'drop-in session' in May 2022. The Proponent paid $100 over 5 days but restricted the audience target to a small geographic area, and by education, business function, and interests, demonstrating their efforts to minimise communication and awareness.

We do not see any effective engagement in a paid Facebook campaign that ran for 5 days in May 2022, when only 104 post engagements were recorded.

6: ASSESSMENT OF KEY IMPACTS (PAGES 101 – 283)

6.1. Visual impact assessment

With reference to Appendix D1 Visual Report, the Proponent suggest the solar farm has "*low landscape character impact*" on the Bathurst Plains Landscape character, a "*moderate visual impact on the views of Brewongle lane on day one and reducing to low visual impact with implementation of the landscape plan*", and "*very low visual impacts on six surrounding dwellings, and low visual impacts on three residences on day one. With the implementation of mitigation this impact would reduce to three residences with a very low visual impact*" (Appendix D1 page 70).

We suggest the descriptions above minimise, and do not reflect the extent of the visual imposition the proposed solar plant has on the area.

In support of this view we refer to the following:-

a) Report of Mr Anthony Daintith dated 13 December 2022 - "*It is glaringly obvious to any scenic observer that the proposed use of the land is totally incompatible with surrounds…Any landscaping would take many years to establish and create any form of acceptable barrier*" (Document 19: Anthony Daintith Report 14.12.2022)

b) Reports of Mr Michael Lund and Mr Andrew Bickford dated 8 and 13 December 2022 respectively. We note Mr Bickford's assessment that, "having viewed the photographs…it is my professional opinion that the proposal will have a significant negative impact on the rural and scenic quality of the land".

c) Report of Ms Erika Dawson dated 13 December 2022 – *"In order to make the visual impacts of the development acceptable, the development relies upon the planting and on-going management/retention of significant vegetative screening along the property boundaries. As outlined…the revegetation of the site will introduce a very different bushfire risk into the site and surrounds…the bushfire mitigation measures proposed as part of the development to not provide for adequate protection commensurate with the risk".*

6.1.2. EXISTING ENVIRONMENT

Community Values

We refer to our observations as set out at page 53 “Digital tools” above.

We suggest that surveys such as those outlined are dangerous and quite capable of misleading. The integrity of the administrator is important.

It is stated that an online survey was undertaken for the project. Does this mean the subject project was actually referred to? – We note the claim the survey, “*Included several questions to identify the local values*”.

We expect that nearly all community would generally support renewables.

We suggest 28 response to the survey is minimal, but note it included 26 landholders and 2 organisations. To be meaningful to the subject project, one ought infer one is entitled to assume the 26 landowners were 26 of the 57 landowners with a 3km radius of the site.

All of those residents visited had signed the so described “generic” petition. Each person confirmed their opposition to the proposal. And of those persons visited only received only one received any survey email, phone call or otherwise, and that person recorded her clear opposition to the subject proposal.

Support for all of the above is in Document 1: Petition and Document 33: Statement from Near Neighbours.

It is hard to reconcile the documentation we have collected, with the responses asserted by the Proponent on EIS page 106. We suggest the Proponent’s assertions ought not be accepted having regard to the documentation we have gathered to the contrary.

Regional and Local Planning Instruments

We object to the Proponents assessment. We refer to our prior comments set out at pages 42-47 above.

6.1.3. POTENTIAL IMPACTS

Landscape sensitivity

The Proponent suggests that the landscape sensitivity is of “*low scenic quality, however due to the value placed on this landscape through the planning provisions, this landscape character area sensitivity has been increased from low to moderate landscape sensitivity*” (See EIS page 108).

We suggest this description minimises what is highly regarded, rural scenic land.

We refer to the following reports in support of this view:-

a) Report of Mr Anthony Daintith dated 13 December 2022 – “*The scenic quality to the “gateway” entrance to Bathurst will be negatively impacted by the construction*

of the solar farm. The entry is characterised by open farming land and then the Bathurst urban area with the famous Mount Panorama in the background that provides an ideal backdrop to the landscape that is synonymous with Bathurst.

The picturesque and productive locality is very much part of Bathurst's beauty and heritage and deserves protection"

b) Report of Mr Andrew Bickford dated 13 December 2022 – "predating, and throughout the entirety of my career, I and professionals within the local and surrounding area have described this area of Bathurst as the 'Green Triangle' – Bathurst's most highly regarded agricultural land…"

6.1.5 MITIGATION MEASURES

We refer to our comments relating to the visual impact assessment at page 56 above.

6.4. Land Compatibility

The issue of land compatibility has been well traversed.

The land is Class 2 and 3 prime agricultural land. This view is well supported.

We suggest the Proponent has failed to address this issue, and the SLR Report is inadequate having regard to the experience of local farms, the classification of the land by the Department of Planning, Industry and Environment, and the assessment of Mr David Harbison, agronomist.

6.4.2. EXISTING ENVIRONMENT

The adequacy of the soil sample taking, and assessment as set out in the SLR report has been fulsomely criticised above. See paragraphs 70 - 79 above.

In summary we note the following:-

a) **Mr David Harbison -** *"Whilst I was not invited to attend the actual soil sampling / assessing of the site when it was conducted, one wonders why the south-western quarter (figure 6-28) of the property has no data reported. Check sites were supposedly conducted, but nothing has been presented. It should be noted also that soil sampling site 1 is taken in nearly the lowest point on the whole site in the middle of the farm's main drainage line. From observations and analysis of neighbouring land adjacent to this south-western area, it may be that this is some of the best and well drained productive soil on the site. It may well have been classified a different land class, with different soil properties, had it been sampled/reported".*

b) The AG observes:-

   a. When taking the soil samples Elgin Energy did not obtain local agronomists familiar with the area;

b. There was no independent oversight, or peer review in the selection of soil sample locations;

c. The sample locations were not located in the southwestern portion of the land, the area identified by Mr Harbison as the most productive portion of the land;

d. With respect, there is a material benefit to Elgin Energy obtaining a classification of the land as 4 and 5.

e. The Proponent's agenda was explained in its brochure before 'a sod of soil was turned'. It needed evidence that the land it had fixed upon was no identified as highest quality agricultural land. That is to say it was not Class 1, 2 or 3 land even though the Department of Agriculture and others have so classified it. But noting it was land in the Class lower than the classes in the highest category. Its reclassifying agenda was set without any practical investigation

f. In its initial brochure, the Proponent so classified this land in terms contrary to the LEP and the Department of Planning, Industry and Environment, and at a point of time when it had not "turned a sod of soil". This we suggest, indicates a lack of bone fides. A conclusion was published by Elgin in its Brochure that appears to be contrary to all informed publications and before it had "turned a sod of soil". Its agenda was therefore, already entrenched.

Land and Soil Capability (EIS page 163)

The issue of land compatibility has been well traversed.

We note the Proponents agreement that "*Classes 1-3 are considered important agricultural land would typically not be considered appropriate for solar farm development without very strong justification*".

We suggest, the land is Class 2 and 3 prime agricultural land. This view is well supported.

We suggest the Proponent has failed to address this issue, and the SLR Report is inadequate having regard to the experience of local farms, the classification of the land by the Department of Planning, Industry and Environment, and the assessment of Mr David Harbison, agronomist.

Agriculture (EIS page 170)

The Proponent observes at page 170 of the EIS that;

> "*Agriculture is not a major employer within the region; with the total of 689 persons employed in the agriculture, forestry and fisheries sector representing only 4% of the total employed population…*
>
> *Agriculture accounts for 42% of land use in the LGA (Australian Bureau of Statistics (ABS, 2016). It is predominantly used for grazing, utilising 95% of all*

agricultural land. The primary enterprise is sheep and lamb farming, which accounts for 91% of livestock numbers, followed by meat cattle (9%) and dairy cattle farming".

These observations by the Proponent, we suggest, are calculated to minimise the impact the subject land has on the local economy. We submit their observations are misleading. We are well supported in this view.

We note the observations of Mr Andrew Bickford of Elders Rural Services Bathurst, who states:-

"Our top 100 clients would employee numerous contractors and staff though out the year.

Most farming operations in the area have employment in the following capacity:

- *Family member running the farm with siblings;*
- *Farm managers and jackaroos;*
- *Farming contractors, to name a few duties, include:*
  - *Fencing, shearing, crutching, sheep drenching, sheep dipping, lamb marking, calf marking, pasture and weed spraying, fertilizer spreading, hay making , contract stock mustering.*

Out of our 200 clients it reasonable, and indeed a conservative estimate to say that 6000 people are employed or contracted onto these farms in our local area.

There are another eight agents operating out of Bathurst with similar statistics to our business". (See Document 23: Andrew Bickford Second Report 13.12.2022)

While a more conservative estimate, Mr David Harbison takes the view that:-

"*I am of the belief that there is well in excess of 4000 rural entities within the Bathurst LGA alone. Each of these will have somebody 'managing' that rural land. Quite simply, it seems self-employed people in agriculture don't seem to count!"* (See Document 16: D. Harbison Report Update 9.12.22)

It is very clear that agriculture in our area employs a large volume of people. It is misleading, we suggest, to indicate otherwise to the SPA.

6.4.3. POTENTIAL IMPACTS

Agricultural conflicts (EIS page 176)

These conflicts have been well traversed.

6.4.4. KEY UNCERTAINTIES OF THE ASSESSMENT

The Proponent suggests that the LSC ratings are "conservative", and further argues the "*entire subject land could have been classified as LSC Class 5 due to Hazard 6: Water Logging*".

We suggest this is erroneous in the extreme and entirely removed from the evidence of the Department of Planning, Industry and Environment, 70+ years of local farming

knowledge and experience, existing and prior land management and production, and the view of Mr Harbison.

We again note the recent observations of Mr John Armstrong who sprayed the property with a Unimog Truck, twelve days ago without incident. He described the soil as "*firm and well drained given the significant rain in the area recently*" (See Document 36: Mr J. Armstrong Statement).

6.10 Hazards and Risks

6.10.1. ASSESSMENT APPROACH

The Proponent identifies three predominant hazards:-

(a) The Battery Energy Storage System;

(b) Electric and magnetic fields (EMFs); and

(c) Bushfire

In relation to each hazard, we comment on (a) and (c) as follows:-

(a) We refer to our observations at page 49. The proponent at 3.2.3 (EIS page 37) fails to provide relevant technical information, but rather describes the system in generic terms. The Proponent is yet to identify the proposed BES.

We suggest it is not possible to appropriately assess hazards and mitigation strategies until such time as a BES system is identified.

(c) In relation to Bushfire, our comments are set out below.

6.10.4 BUSHFIRE

The Proponent describes the land as "not identified as bush fir prone land on the Bathurst Regional Council's Bush Fire Prone Land (BFPL) map" (EIS page 273).

While the classification conforms to the BFPL, we note the observations of Ms Erika Dawson (See Document 17: Erika Dawson Bushfire Expert Report, 7 December), who opines:-

> *"The RFS has published the Guide for Bush Fire Prone Land Mapping to assist Councils in preparing the BFPL Map. This guide was last updated in November 2015 and introduced a new Category 3 Vegetation which encompasses medium risk bush fire vegetation including inter alia grassland vegetation… Bathurst Regional Council has not amended its BFPL Map to include Category 3 Vegetation.*
>
> *The solar farm site and its surrounds should be classified as Category 3 Vegetation as it comprises grassland that is not maintained in a managed state (for the purposes of considering bushfire hazard) and cropping is observed as being intermittently carried out and cannot be reasonably excluded from being bush fire prone land on that basis"*

We therefore suggest this land should be properly considered as bushfire prone land.

"main bush fire hazards" (EIS page 273 (bottom of page))

The Proponent sets out a number of "main bushfire hazards" but fails to include the introduction of bushfire into the site from neighbouring properties undertaking agricultural activity.

Ms Erika Dawson notes:-

> *"It is a very real prospect that a bushfire could ignite on surrounding land and travel to impact the solar farm site"*

In support of this view is the report of Mr. Graham Swain, who states:-

> *"Fire has the potential to commence on the land surrounding the site on which approval is being sought…Ignition sources include farm machinery, welding, cutting, grinding, vehicles, cigarettes and lightning."*

(See Document 18: Graham Swain Fire Report 5.12.2022)

We suggest this is a significant deficiency in the identification of bushfire risks, and is a significant risk factor to consider, particularly having regard to the insurance issue set out at paragraphs 119 – 146 above.

Asset Protection Zone (EIS page 279)

The Proponent, in accordance with section 8.3.5 of the NSW RFS Planning for Bush Fire Protection 2019 (PBP), indicate "*a minimum 10m Asset Protection Zone (APZ) around the solar farm buildings, substation and BESS, and around the outside perimeter of the solar array*".

They further note that "*the vegetation and bushfire mapping do not suggest that an APZ greater than 10m would be required*".

In relation to the bushfire mapping the Proponent suggests an APZ greater than 10m is not required. In response, we note Ms Dawson's observations that the land should properly be categorised as Category 3 Vegetation, bush fire prone land. (See directly above)

In relation to the adequacy of the Proponent's proposed 10m APZ, Ms Dawson observes:-

> *"The location of the APZ on the inside of landscape buffers will do little in the way of providing an effective APZ. The APZ's will essentially be a narrow corridor between tall forest like vegetation and the solar panels. It will not provide a safe space for fire fighters to operate and will not provide a functional defendable space due to the narrowness and density of vegetation restricting views toward the approaching fire. Furthermore, many of the areas of the APZ do not have access provided"*
>
> (See Document 17: Erika Dawson Bushfire Expert Report, 7 December)

We suggest with the inclusion of landscape planting for visual purposes, as noted by Ms Dawson, renders the 10m APZ inadequate for the fighting of any fire on the subject property, or indeed, fire emanating from neighbouring properties.

We further note Ms Dawsons concerns that the "Landscape Concept Plan" introduces very different bushfire risks:-

> *"Landscape planting, in the 5 and 10 m landscape strips, riparian corridors and exclusion/ pasture areas will provide significant revegetation and density of vegetation, in some areas introducing a vegetation likely to be consistent with forest classification.*
>
> *This revegetation will introduce a very different bushfire risk to the site compared to the existing grassland vegetation. For example, whilst the rate of spread of the fire would be slower in a forest type vegetation compared to grassland, it would have significantly greater flame lengths, greater radiant heat, longer residence times, and increase chance of spotting. This different bushfire risk resulting from revegetation has not been considered in the assessment and the mitigation measure have not been provided to reflect the different bushfire behaviour".*

We further note the observations of Mr Graham Swain, who corroborates Ms Dawson's view:-

> *"The addition of the proposed planting along the boundary of the solar farm site, combined with the proposed screen planting on the solar farm site, will increase level of radiant heat on the arrays and increase the risk of ember attack from burning bark and leaves"*

(See Document 18: Graham Swain Fire Report 5.12.2022)

Fire-fighting Resources and Preparedness (EIS page 280)

The Proponent indicates that "*water storage tanks are to be installed with the Development footprint for fire-fighting and other non-potable water uses, with a 65mm Storz outlet, a metal valve and a minimum of 20,000 litres reserved for fire-fighting purposes*".

We note this Proponent's proposal is without the consultation with local NSW RFS District Fire Control Centre.

In relation to the adequacy of this proposed mitigation strategy, Ms Dawson's expert view is that:-

> *"The water supply proposed to be provided for firefighting purposes is the equivalent of the that required to protect one (1) dwelling house. The solar farm site has a perimeter distance of over 6km and an area of nearly 200 hectares. The proposed water supply would be vastly insufficient to provide any meaningful protection of the site.*
>
> *In the absence of a specific numerical guideline for water supply volume for solar farms in PBP, the recent Country Fire Service Design Guidelines and Model Requirements: Renewable Energy Facilities could be utilised as a best practice guide, which requires:-*

a. *Generally, for the solar farm one (1) x 45,000L static water tank for every 100 hectares of a site, plus,*
b. *For the battery energy storage system protection, no less than 288,000L or as per the provisions for Open Yard Protection of AS 2419.1-2005 flowing for a period of no less than four hours at 20L/s, whichever is greater, plus*
c. *For the substation."*

(See Document 17: Erika Dawson Bushfire Expert Report, 7 December)

We suggest, the mitigation measures are insufficient.

7: ASSESSMENT AND ADDITIONAL IMPACTS (PAGES 284 – 311)

This section of EIS in summary form repeats the relevant material in the prior sections. For this reason we do not intend to comment in any thorough detail.

We do note however, and strongly agree with, the observations of Ms Erika Dawson, Town Planner / Bushfire Consultant who, in her professional opinion states,

"the absence of sufficient consideration of the matters as outlined in this submission mean that the cumulative impacts of the development have not been adequately contemplated as part of the EIS.

The EIS has not reasonably considered the suitability of the site for the development in terms of Section 4.15 (1) (c) of the Environmental Planning and Assessment Act 1979".

8. PROJECT JUSTIFICATION (PAGES 312 – 326)

In response to the contents of this section, we note the observations of Ms Erika Dawson, Town Planner/ Fire Expert, who states:-

"A large part of the justification for the project is based on the premise that the land is not of high agricultural value, which has been reported as incorrect…

The justification is based on an inadequate consideration of impacts which, in particular, understates impacts of the development and land use conflict"

(See Document 35: E. Dawson, Town Planner Report December 2022)

8.1.2 PROVIDE NEW INDUSTRIES AND OPPORTUNITIES TO THE BATHURST REGION

The Proponent when summarising its view as to agricultural conflicts, which they considered of the "highest potential" for conflict, states that;

"For agricultural conflicts, the continued agricultural use of the Subject land during the life of the Project would be almost entirely curtailed. ***This is not considered a conflict at a local rural economy level; the one landowner will be compensated by their involvement with the Project****.* ***No impact on adjacent agricultural operations is likely; either to the agricultural equipment, activities or soil capability****.* ***Fire ignition and fire spread risks as well as risks to soil and water are considered highly manageable*** *and likely to be offset by longer term benefits of less intensively worked land in operation" (emphasis added)*
(See EIS page 313).

Each highlighted assessment made by the Proponent, we suggest, has been refuted in this submission.

(1) Removing the land from agricultural production **does** negatively impacts the local rural economy. (See paragraphs 104 – 110, and pages 59 and 60).

(2) The solar proposal **will** we significantly impact neighbouring agricultural activities.

The AG identify significant unresolved insurance issues that, when properly assessed, have the potential to cause agricultural production to cease due to an inability to obtain adequate insurance (See paragraphs 119 – 146).

(3) The solar proposal **will** be impact soil capability due to the increased over flow of water, erosion, increased salinity, and weeds. (See paragraphs 147-149 (overflow of water), 150 (Soil Erosion),152 – 154 (increased salinity), 155 – 156 (weeds).

(4) Fire ignition and fire spread risks are **not** considered highly manageable.

Ignition from neighbouring properties is significant. We suggest the Proponent has inadequately considered these factors (See pages 61 – 64). Ms Dawson, Fire Expert also identifies significant inadequacies in the 10m APZ (Asset Protection Zone) such that 10m is insufficient.

Fire risks cannot be considered "highly manageable".

8.2 Benefit Summary

The Proponent identifies a number of project "benefits", relevantly, they argue:-

(a) "*increase the income generated from the site by a significant factor*";

(b) "benefit-sharing" with eight community initiatives; and

(c) "*Ensuring no significant impacts on the scenic character of the area*".

In relation to:-

(a) We suggest this benefit will not be enjoyed by the local community as the profits will be extracted by the Proponent and the Sydney based landowner. (See paragraph 104 – 110)

(b) We suggest this is a false benefit to the community.

The proponent intends to invest $18,000 annually into these groups. This is a small portion of the estimated $126,664.00 annual operating expenses of the subject land under agricultural production. These expenses are injected annually into the local economy (See paragraphs 104 – 110).

(c) We suggest there are significant impacts on the scenic character of the land. The impact is such as to "*have serious detrimental impact upon the surrounding properties both in terms of value and in terms of production*", and "*negative[ly] impact the rural and scenic quality of the land*" (See paragraph 80) .

8.6 Conclusion

The Glanmire Action Group suggests, and is well supported in this view, that Proponent has not met all relevant planning provisions and guidelines. We further suggest, relying on our observations, and relevant expert reports, that the proposal is not considered justifiable and acceptable.

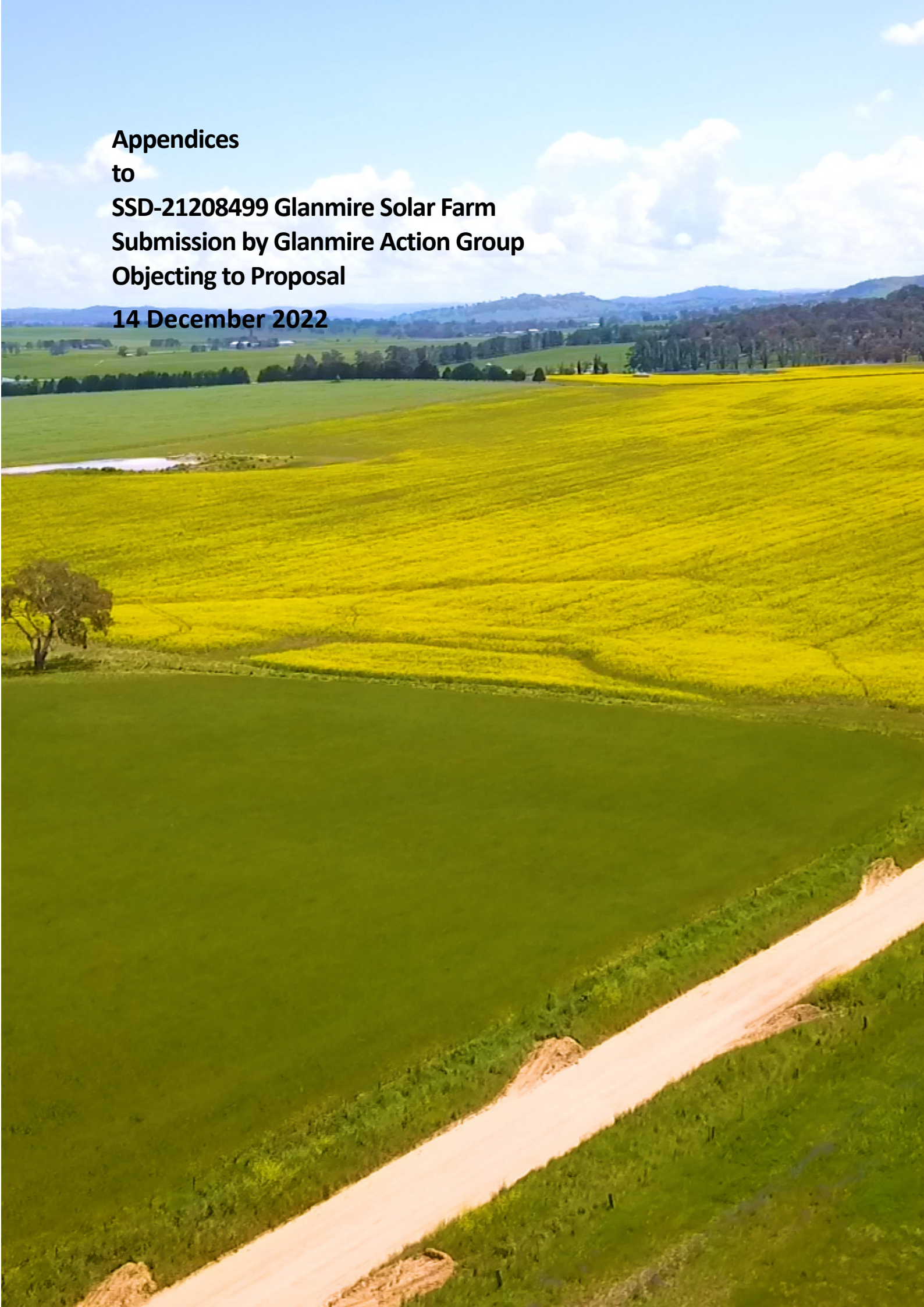
8: SUBMISSION CONCLUSION

We refer to the conclusions we expressed in paragraphs 31 and 63, and pages 40 and 65, it is clear from the observations in those paragraphs that a Proponent's credibility, frankness, consultation and truthfulness are most important factors in proposing a proposal such as this.

These factors has been emphasised by the State Planning Authority in so many documents it has produced and we suggest has been reasonably summarised by us in this submission paragraphs 8 - 12.

For the reasons outlined in this submission we suggest that the Proponent lacks the necessary qualities and so great care must be taken in assessing any statement it asserts.

The Proponent's lack of credibility, our well documented community opposition, together with our qualified experts reports upon which we rely, ought, we suggest, cause the State Planning Authority to dismiss the Proponent's application.



Appendices
to
SSD-21208499 Glanmire Solar Farm
Submission by Glanmire Action Group
Objecting to Proposal

14 December 2022

Document 1: Petition

M 12

OBJECTION FORM

To Whom It May Concern

Re: Elgin Energy P/L Solar Proposal at 4823 Great Western Highway, Glanmire

I am familiar with Glanmire, its location and landscape.

I have read Elgin's Solar Proposal brochure.

I have read Glanmire Action Group's opposition brochure.

I am against the Solar Proposal because:

(Please mark boxes)

- [X] Wrong location
- [X] Location too good - gateway to Bathurst
- [X] Too much financial loss to Bathurst
- [X] It is contrary to Bathurst Regional Environment Plan 2014
- [X] It is contrary to Bathurst Regional Local Strategic Planning Statement
- [X] I support State Government Designated Zone
  - Central West (Orana) Renewable Energy Zone
- [X] OR for all of the above reasons

Other Reasons/Comments:

Signed:

Contact Details *(optional)*

0405 736 936

64 Mersing Lane

Please return completed objection forms to glanmireactiongroup@hotmail.com

~~Or personally at the Glanmire Action Group information session 14th-15th May 2021~~

agree

M 13

OBJECTION FORM

To Whom It May Concern

Re: Elgin Energy P/L Solar Proposal at 4823 Great Western Highway, Glanmire

I am familiar with Glanmire, its location and landscape. I live in Glanmire.

I have read Elgin's Solar Proposal brochure. ✓

I have read Glanmire Action Group's opposition brochure. ✓

I am against the Solar Proposal because:

(Please mark boxes)

- [✓] Wrong location
- [✓] Location too good - gateway to Bathurst
- [ ] Too much financial loss to Bathurst
- [ ] It is contrary to Bathurst Regional Environment Plan 2014
- [ ] It is contrary to Bathurst Regional Local Strategic Planning Statement
- [ ] I support State Government Designated Zone
  - Central West (Orana) Renewable Energy Zone
- [ ] OR for all of the above reasons

Other Reasons/Comments:

I would be driving past the proposed location every day. I suggest there could be a much better location which is not on the highway.

Signed:

Jamieson

Contact Details *(optional)*

188 Mersing Rd,

Glanmire. 2795

Please return completed objection forms to glanmireactiongroup@hotmail.com

~~**Or personally at the Glanmire Action Group information session 14th-15th May 2021**~~

M 14

OBJECTION FORM

To Whom It May Concern

Re: Elgin Energy P/L Solar Proposal at 4823 Great Western Highway, Glanmire

I am familiar with Glanmire, its location and landscape.

I have read Elgin's Solar Proposal brochure.

I have read Glanmire Action Group's opposition brochure.

I am against the Solar Proposal because:

(Please mark boxes)

- ☐ Wrong location
- ☐ Location too good - gateway to Bathurst
- ☐ Too much financial loss to Bathurst
- ☐ It is contrary to Bathurst Regional Environment Plan 2014
- ☐ It is contrary to Bathurst Regional Local Strategic Planning Statement
- ☐ I support State Government Designated Zone
  - Central West (Orana) Renewable Energy Zone
- ☒ OR for all of the above reasons

Other Reasons/Comments:

I support the adoption of solar and renewables 100% but also agree that the proposed site at 4823 Great Western Highway Glanmire is not a good choice for the reaso above.

Signed:

Contact Details *(optional)*

3 Bruce Street, Cooks Hill, 2300

Family home: 132 Mersing Road, Glanmire 2795

Please return completed objection forms to glanmireactiongroup@hotmail.com

~~Or personally at the Glanmire Action Group information session 14th-15th May 2021~~

M 15

OBJECTION FORM

To Whom It May Concern

Re: Elgin Energy P/L Solar Proposal at 4823 Great Western Highway, Glanmire

I am familiar with Glanmire, its location and landscape.

I have read Elgin's Solar Proposal brochure.

I have read Glanmire Action Group's opposition brochure.

I am against the Solar Proposal because:

(Please mark boxes)

- [x] Wrong location
- [x] Location too good - gateway to Bathurst
- [x] Too much financial loss to Bathurst
- [x] It is contrary to Bathurst Regional Environment Plan 2014
- [x] It is contrary to Bathurst Regional Local Strategic Planning Statement
- [x] I support State Government Designated Zone
  - Central West (Orana) Renewable Energy Zone
- [x] OR for all of the above reasons

Other Reasons/Comments:

Signed: Patrick Puckett

Contact Details *(optional)* 0433791623

M16

OBJECTION FORM

To Whom It May Concern

Re: Elgin Energy P/L Solar Proposal at 4823 Great Western Highway, Glanmire

I am familiar with Glanmire, its location and landscape.

I have read Elgin's Solar Proposal brochure.

I have read Glanmire Action Group's opposition brochure.

I am against the Solar Proposal because:

(Please mark boxes)

- [x] Wrong location
- [x] Location too good - gateway to Bathurst
- [x] Too much financial loss to Bathurst
- [x] It is contrary to Bathurst Regional Environment Plan 2014
- [x] It is contrary to Bathurst Regional Local Strategic Planning Statement
- [x] I support State Government Designated Zone – Central West (Orana) Renewable Energy Zone
- [x] OR for all of the above reasons

Other Reasons/Comments:

Signed: E J T.

Contact Details *(optional)*

316 Mersing Rd
Glanmire NSW 2795

M 17

OBJECTION FORM

To Whom It May Concern

Re: Elgin Energy P/L Solar Proposal at 4823 Great Western Highway, Glanmire

I am familiar with Glanmire, its location and landscape.

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(Please mark boxes)

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- [x] Too much financial loss to Bathurst
- [x] It is contrary to Bathurst Regional Environment Plan 2014
- [x] It is contrary to Bathurst Regional Local Strategic Planning Statement
- [x] I support State Government Designated Zone
  - Central West (Orana) Renewable Energy Zone
- [x] OR for all of the above reasons

Other Reasons/Comments:

Signed:

Contact Details *(optional)*

186 Mossing Rd, Glanmire

Please return completed objection forms to glanmireactiongroup@hotmail.com

Or personally at the Glanmire Action Group information session 14th -15th May 2021

M 18

OBJECTION FORM

To Whom It May Concern

Re: Elgin Energy P/L Solar Proposal at 4823 Great Western Highway, Glanmire

I am familiar with Glanmire, its location and landscape.

I have read Elgin's Solar Proposal brochure.

I have read Glanmire Action Group's opposition brochure.

I am against the Solar Proposal because:

(Please mark boxes)

- [x] Wrong location
- [x] Location too good - gateway to Bathurst
- [x] Too much financial loss to Bathurst
- [x] It is contrary to Bathurst Regional Environment Plan 2014
- [x] It is contrary to Bathurst Regional Local Strategic Planning Statement
- [x] I support State Government Designated Zone
  - Central West (Orana) Renewable Energy Zone
- [ ] OR for all of the above reasons

Other Reasons/Comments:

Prime Ag land.

Signed:

Contact Details *(optional)*

375 Mereniz Rd.

Please return completed objection forms to glanmireactiongroup@hotmail.com

~~**Or personally at the Glanmire Action Group information session 14th-15th May 2021.**~~

M 19

OBJECTION FORM

To Whom It May Concern

Re: Elgin Energy P/L Solar Proposal at 4823 Great Western Highway, Glanmire

I am familiar with Glanmire, its location and landscape.

I have read Elgin's Solar Proposal brochure.

I have read Glanmire Action Group's opposition brochure.

I am against the Solar Proposal because:

(Please mark boxes)

- ☐ Wrong location
- ☐ Location too good - gateway to Bathurst
- ☐ Too much financial loss to Bathurst
- ☐ It is contrary to Bathurst Regional Environment Plan 2014
- ☐ It is contrary to Bathurst Regional Local Strategic Planning Statement
- ☐ I support State Government Designated Zone
  - Central West (Orana) Renewable Energy Zone
- ☑ OR for all of the above reasons

Other Reasons/Comments:

MAKES NO SENSE

Signed:

Contact Details *(optional)*

321 MEARSING RD

GLANMIRE NSW 2795

0429 042 012

Please return completed objection forms to glanmireactiongroup@hotmail.com

~~**Or personally at the Glanmire Action Group information session 14th - 15th May 2021**~~

M20

Sent from Mail for Windows 10

From: Corey Belan
Sent: Friday, 21 May 2021 2:59 PM
To: glanmireactiongroup@hotmail.com
Subject: Objection Form for the Proposed Solar Farm at 4823 Great Western Highway, Glanmire

I am against the Solar Proposal because
7. All of the Above

On behalf of Francine Dickerson at Glanmire

Yours Sincerely
Corey Belan

M21

OBJECTION FORM

To Whom It May Concern

Re: Elgin Energy P/L Solar Proposal at 4823 Great Western Highway, Glanmire

I am familiar with Glanmire, its location and landscape.

I have read Elgin's Solar Proposal brochure.

I have read Glanmire Action Group's opposition brochure.

I am against the Solar Proposal because:

(Please mark boxes)

- [x] Wrong location
- [x] Location too good - gateway to Bathurst
- [x] Too much financial loss to Bathurst
- [x] It is contrary to Bathurst Regional Environment Plan 2014
- [x] It is contrary to Bathurst Regional Local Strategic Planning Statement
- [x] I support State Government Designated Zone
  - Central West (Orana) Renewable Energy Zone
- [x] OR for all of the above reasons

Other Reasons/Comments:

as a resident of Glanmire I sincerely object to this location

Signed:

Contact Details *(optional)*

Catherine E Cox

0428 101 105

Please return completed objection forms to glanmireactiongroup@hotmail.com

~~Or personally at the Glanmire Action Group information session 14th-15th May 2021~~

A

agree TT

M22

OBJECTION FORM

To Whom It May Concern

Re: Elgin Energy P/L Solar Proposal at 4823 Great Western Highway, Glanmire

I am familiar with Glanmire, its location and landscape.

I have read Elgin's Solar Proposal brochure.

I have read Glanmire Action Group's opposition brochure.

I am against the Solar Proposal because:

(Please mark boxes)

- ☐ Wrong location
- ☐ Location too good - gateway to Bathurst
- ☐ Too much financial loss to Bathurst
- ☐ It is contrary to Bathurst Regional Environment Plan 2014
- ☐ It is contrary to Bathurst Regional Local Strategic Planning Statement
- ☐ I support State Government Designated Zone
  - Central West (Orana) Renewable Energy Zone
- ☑ OR for all of the above reasons

Other Reasons/Comments:

I am a local on saint Anthonys. Creek road

Signed:

Contact Details *(optional)*

0437792920

167 saint anthonys. Creek Road GLANMIRE

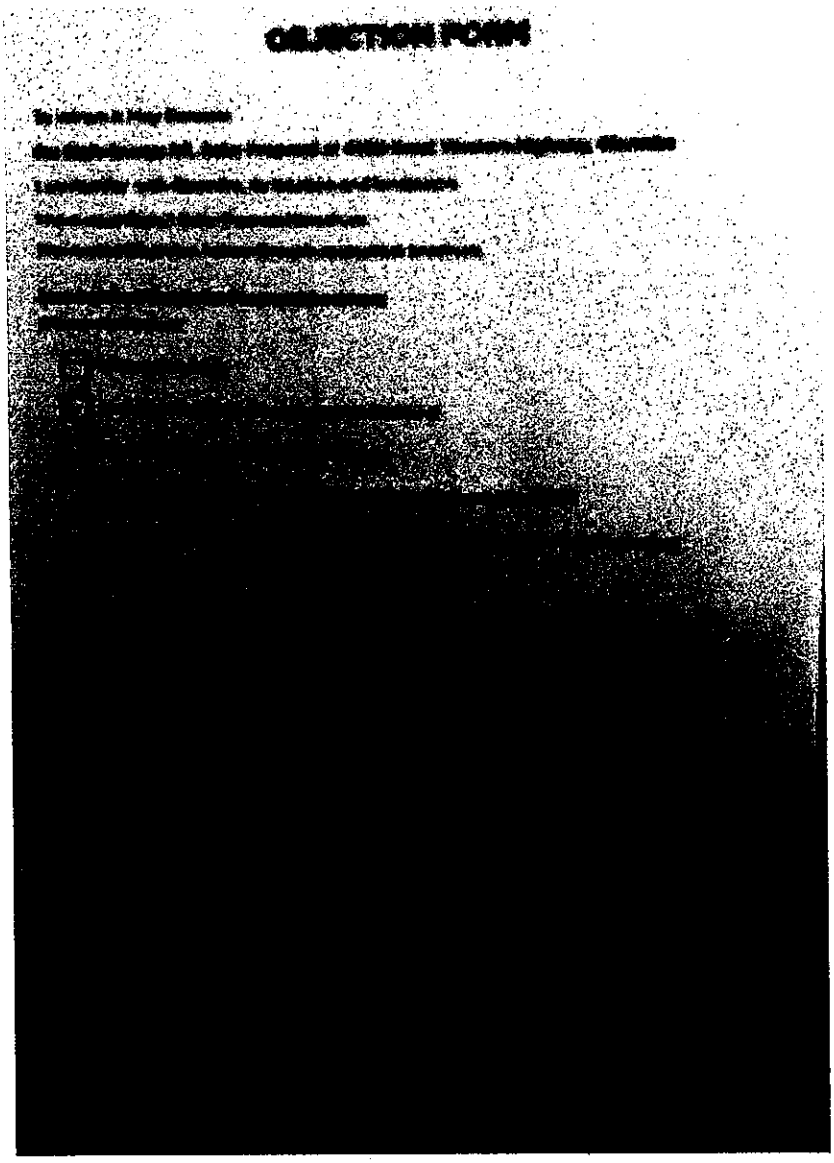
A

agree.

M24

Kerry Robinson

132 Mersing lane



R25

OBJECTION FORM

To Whom It May Concern

Re: Elgin Energy P/L Solar Proposal at 4823 Great Western Highway, Glanmire

I am familiar with Glanmire, its location and landscape.

I have read Elgin's Solar Proposal brochure.

I have read Glanmire Action Group's opposition brochure.

I am against the Solar Proposal because:

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- ☐ Too much financial loss to Bathurst
- ☐ It is contrary to Bathurst Regional Environment Plan 2014
- ☐ It is contrary to Bathurst Regional Local Strategic Planning Statement
- ☐ I support State Government Designated Zone
  - Central West (Orana) Renewable Energy Zone
- ☑ OR for all of the above reasons

Other Reasons/Comments:

Signed: Bobby

Contact Details *(optional)*

0439675840

413 Brewongle Lane.

Please return completed objection forms to glanmireactiongroup@hotmail.com

~~Or personally at the Glanmire Action Group information session 14th - 15th May 2021~~

R 26

OBJECTION FORM

To Whom It May Concern

Re: Elgin Energy P/L Solar Proposal at 4823 Great Western Highway, Glanmire

I am familiar with Glanmire, its location and landscape.

I have read Elgin's Solar Proposal brochure.

I have read Glanmire Action Group's opposition brochure.

I am against the Solar Proposal because:

(Please mark boxes)

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- [ ] It is contrary to Bathurst Regional Environment Plan 2014
- [ ] It is contrary to Bathurst Regional Local Strategic Planning Statement
- [ ] I support State Government Designated Zone – Central West (Orana) Renewable Energy Zone
- [ ] OR for all of the above reasons

Other Reasons/Comments:

Signed:

Contact Details *(optional)*

Please return completed objection forms to glanmireactiongroup@hotmail.com

~~Or personally at the Glanmire Action Group information session 14th-15th May 2021~~

R 27

OBJECTION FORM

To Whom It May Concern

Re: Elgin Energy P/L Solar Proposal at 4823 Great Western Highway, Glanmire

I am familiar with Glanmire, its location and landscape.

I have read Elgin's Solar Proposal brochure.

I have read Glanmire Action Group's opposition brochure.

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- ☐ Too much financial loss to Bathurst
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- ☐ It is contrary to Bathurst Regional Local Strategic Planning Statement
- ☐ I support State Government Designated Zone
  - Central West (Orana) Renewable Energy Zone
- ☑ OR for all of the above reasons

Other Reasons/Comments:

Signed:

Contact Details *(optional)*

0432801770

Please return completed objection forms to glanmireactiongroup@hotmail.com

~~**Or personally at the Glanmire Action Group information session 14th-15th May 2021**~~

16

agree

R28

OBJECTION FORM

To Whom It May Concern

Re: Elgin Energy P/L Solar Proposal at 4823 Great Western Highway, Glanmire

I am familiar with Glanmire, its location and landscape.

I have read Elgin's Solar Proposal brochure.

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(Please mark boxes)

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- [ ] Too much financial loss to Bathurst
- [ ] It is contrary to Bathurst Regional Environment Plan 2014
- [ ] It is contrary to Bathurst Regional Local Strategic Planning Statement
- [ ] I support State Government Designated Zone – Central West (Orana) Renewable Energy Zone
- [x] OR for all of the above reasons

Other Reasons/Comments:

Signed:

Contact Details *(optional)*

DOUGAL MACPHERSON

0484129846

DOUGAL_MACPHERSON@HOTMAIL.COM

Please return completed objection forms to glanmireactiongroup@hotmail.com

~~**Or personally at the Glanmire Action Group information session 14th -15th May 2021**~~

A

agree

R29

OBJECTION FORM

To Whom It May Concern

Re: Elgin Energy P/L Solar Proposal at 4823 Great Western Highway, Glanmire

I am familiar with Glanmire, its location and landscape.

I have read Elgin's Solar Proposal brochure.

I have read Glanmire Action Group's opposition brochure.

I am against the Solar Proposal because:

(Please mark boxes)

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- ☐ Location too good - gateway to Bathurst
- ☐ Too much financial loss to Bathurst
- ☐ It is contrary to Bathurst Regional Environment Plan 2014
- ☐ It is contrary to Bathurst Regional Local Strategic Planning Statement
- ☐ I support State Government Designated Zone
  - Central West (Orana) Renewable Energy Zone
- ☑ OR for all of the above reasons

Other Reasons/Comments:

Signed:

P. Wharton

Contact Details *(optional)*

P. Wharton

PO Box 573 Bathurst

0437043502.

Please return completed objection forms to glanmireactiongroup@hotmail.com

~~**Or personally at the Glanmire Action Group information session 14th-15th May 2021**~~

agree18

R30

OBJECTION FORM

To Whom It May Concern

Re: Elgin Energy P/L Solar Proposal at 4823 Great Western Highway, Glanmire

I am familiar with Glanmire, its location and landscape.

I have read Elgin's Solar Proposal brochure.

I have read Glanmire Action Group's opposition brochure.

I am against the Solar Proposal because:

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- [x] Too much financial loss to Bathurst
- [x] It is contrary to Bathurst Regional Environment Plan 2014
- [x] It is contrary to Bathurst Regional Local Strategic Planning Statement
- [x] I support State Government Designated Zone
  - Central West (Orana) Renewable Energy Zone
- [ ] OR for all of the above reasons

Other Reasons/Comments:

UGLY & CANNOT GET RID OF WHEN FINISHED. CANT BURY, DISGUSTING.

Signed:

William M Vadgeas

Contact Details *(optional)*

753 Brewongle Lane

Brewongle 2795.

Please return completed objection forms to glanmireactiongroup@hotmail.com

Or personally at the Glanmire Action Group information session 14th -15th May 2021

Q 31

OBJECTION FORM

To Whom It May Concern

Re: Elgin Energy P/L Solar Proposal at 4823 Great Western Highway, Glanmire

I am familiar with Glanmire, its location and landscape.

I have read Elgin's Solar Proposal brochure.

I have read Glanmire Action Group's opposition brochure.

I am against the Solar Proposal because:

(Please mark boxes)

- ☐ Wrong location
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- ☐ Too much financial loss to Bathurst
- ☐ It is contrary to Bathurst Regional Environment Plan 2014
- ☐ It is contrary to Bathurst Regional Local Strategic Planning Statement
- ☐ I support State Government Designated Zone – Central West (Orana) Renewable Energy Zone
- ☑ OR for all of the above reasons

Other Reasons/Comments:

This is sensitive area with high land and property value due to their close proximity to the Bathurst CBD.

Signed:

Contact Details *(optional)*

0415 368 978

Please return completed objection forms to glanmireactiongroup@hotmail.com

Or personally at the Glanmire Action Group information session 14th -15th May 2021

R32

OBJECTION FORM

To Whom It May Concern

Re: Elgin Energy P/L Solar Proposal at 4823 Great Western Highway, Glanmire

I am familiar with Glanmire, its location and landscape.

I have read Elgin's Solar Proposal brochure.

I have read Glanmire Action Group's opposition brochure.

I am against the Solar Proposal because:

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- [ ] I support State Government Designated Zone – Central West (Orana) Renewable Energy Zone
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Other Reasons/Comments:

Signed:

Contact Details *(optional)*

JANET SARAN

155 TARANA RD

BRENDALE

Please return completed objection forms to glanmireactiongroup@hotmail.com

~~**Or personally at the Glanmire Action Group information session 14th -15th May 2021.**~~

R33

OBJECTION FORM

To Whom It May Concern

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- [ ] I support State Government Designated Zone – Central West (Orana) Renewable Energy Zone
- [ ] OR for all of the above reasons

Other Reasons/Comments:

Signed:

Contact Details *(optional)*

Emily Saran
155A Tarana rd,
Brewongle

Please return completed objection forms to glanmireactiongroup@hotmail.com

~~**Or personally at the Glanmire Action Group information session 14th -15th May 2021**~~

R34

OBJECTION FORM

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- [ ] OR for all of the above reasons

Other Reasons/Comments:

Signed:

Contact Details *(optional)*

JIM SAHAN

157 TARANA RD

BREWONGLE.

Please return completed objection forms to glanmireactiongroup@hotmail.com

~~**Or personally at the Glanmire Action Group information session 14th -15th May 2021**~~

PETITION AGAINST THE PROPOSED SOLAR PLANT BY ELGIN ENERGY AT GLANMIRE

NAME	ADDRESS	SIGNATURE	REASON FOR OPPOSITION
PeterCreen	18 Alcheringa Rd Kelso.		only going to waste good farming land.
BRIAN MASTERS	758 BREWONGLE LANE, BREWONGLE	B. Masters	" "
Helen McFadzean	752 Brewongle Lane Brewongle 2795	Helen McFadzean	Go Somewhere else where crap Land & no farms.
Kerry McFadzean	" "	K McFadzean	"
Sheridan Allen	671 Brewongle Ln	S Allen	Good farming ground.

PETITION AGAINST THE PROPOSED SOLAR PLANT BY ELGIN ENERGY AT GLANMIRE

NAME	ADDRESS	SIGNATURE	REASON FOR OPPOSITION	
max gitterny	385 napopolen street rd nepolen		not on farming ground	R40
Jess brock	674 Brewongle lane Brewongle		not on farming land	R41
Sarah watterson	443 Walang Drive Walang.		Not on farming ground	R42
Jes Lee White	443 Walang Drive Walang		Not on farming land STOP selling our country.	R43
R. OSBORNE	421 WALANG DR. WALANG		TO GOOD TO PUT SOLAR ON FERTILE LAND.	R44

PETITION AGAINST THE PROPOSED SOLAR PLANT BY ELGIN ENERGY AT GLANMIRE

NAME	ADDRESS	SIGNATURE	REASON FOR OPPOSITION
Melissa Start	4660 Great western Hwy Glanmire	M Start	Poor Location, no real benefit to local Community
LAURIE GRIMA & MARGARET GRIMA	2121 TARANA ROAD GEMALLA VIA BATHURST " "	L grima M grima	NOT SUITED FOR THE LOCATION Poor Location
Martin Start.	4660 Great Western Hwy Glanmire 2795.		Prime land & Wrong location.
Teresa Miller	123 Billywillinga Rd. Billywillinga	Miller	Location

PETITION AGAINST THE PROPOSED SOLAR PLANT BY ELGIN ENERGY AT GLANMIRE

NAME	ADDRESS	SIGNATURE	REASON FOR OPPOSITION
JOSH Holland	567 TARANA RD		Eyesore Good FARM LAND
Chris Winsor	2 Calcutta ST Newbridge.		~~use~~ Bad. Country.
JOHN GREENFIELD	45 ROM ST		SHOULD BE ON ~~FARM~~ COUNTRY
G. ALLEN	5 Hoy 7 Wells		FARMING COUNTRY
Brittany Allen	1333 Carnwarri Rd O'Connell		Farming Land.

R 50
R 51
R 52
R 53
R 54

27

PETITION AGAINST THE PROPOSED SOLAR PLANT BY ELGIN ENERGY AT GLANMIRE

NAME	ADDRESS	SIGNATURE	REASON FOR OPPOSITION	
Nicole Linnane	421 Walang Dve Walang		Not on farming land	R 55
DEBBIE OSBORNE	435 WALANG DR WALANG	DOsborne	Eyesore on entering Bathurst for our tourism + not on farming land.	R 56
Warrick Osborne	435 WALANG DR WALANG		DISTRACTION ON HIGHWAY DRIVING, & NOT ON PRIME FARMING LAND	R 57
Richard CURRIE	615 Tarana Rd. Bevendale.		Not on Farming Land.	R 58
Frat Smith	615 Tarana Rd Bevendale.		not on farming ground	R 59

PETITION AGAINST THE PROPOSED SOLAR PLANT BY ELGIN ENERGY AT GLANMIRE

NAME	ADDRESS	SIGNATURE	REASON FOR OPPOSITION
Ash Sheridon.	10/38 park st orange.		Prime land.
Alannah Hurford	5 Hurford Place Orange	A. Hurford.	Prime Land.
Dean Price	99 Icely Rd Orange.		Prime land.
Pete O'Hara	264 Tarana Rd Brewongle 2795	P. Olefare	Prime land. Not an appropriate place.
Paddy O'Hara	264 Tarana Rd. Brewongle	P. Ohara	Prime land

PETITION AGAINST THE PROPOSED SOLAR PLANT BY ELGIN ENERGY AT GLANMIRE

NAME	ADDRESS	SIGNATURE	REASON FOR OPPOSITION	
Julia Panagopoulos	380 Tarana Rd Brewongle		Wrong Place	R 65
Viv Press	390 Tarana Rd. Brewongle.	V. Press	Prime farming land	R 66
Maureen Press	393 Tarana Rd.	M Press	✓ ✓ ✓	R 67
JEFF & PAULA GRATHAM	18 GLANMIRE LANE GLANMIRE		WRONG PLACE WOULD DESTRACE ROADS USERS	R 68
PAULA TOBIN WARREN TOBIN	142 WESTS LANE BREWONGLE	Paula Tobin	Wrong use for prime farming land. ✓	R 69

80

PETITION AGAINST THE PROPOSED SOLAR PLANT BY ELGIN ENERGY AT GLANMIRE

NAME	ADDRESS	SIGNATURE	REASON FOR OPPOSITION	
BRIAN M. TOBIN	11 SYDNEY RD, RACLAN		NOT ON PRIME FARMING LAND.	R 70
Denise Clenton	1041 Tarana Rd. Wambool	D Clenton	" " " "	
Geoff Clenton.	1041 Tarana Rd Wambool	G W. Clenton.	Not on Prime Farming Land.	R 71
LIBBY MYERS	416 Timber Ridge Rd Wombool	Ellyer	Not suitable in this area	R 72
Frank Myers	416 Timber Ridge Rd Wambool	F C Myers	Not on prime farm Land & Not in MY VIEW	R 73
Steve Locke	607 Tarana Rd Brewongle		Not on prime farming land.	R 74

81

PETITION AGAINST THE PROPOSED SOLAR PLANT BY ELGIN ENERGY AT GLANMIRE

NAME	ADDRESS	SIGNATURE	REASON FOR OPPOSITION	
[illegible] Barton	34 Totnes Valley Road.		Better on crappy land.	R 75
Robin.	101 Burkes Lane. Brewongle		Crop.	R 76
Peter McGrath	Burkes Lane Brewongle		Don't use quality land	R 77
BRETT CULNANE	47 MEARES RD		WASTE OFF GOOD FARMING LAND.	R 78
LIAM O'HARA	269 TARANA RD BREWONGLE		WRONG PLACE ✓	R 79

32

PETITION AGAINST THE PROPOSED SOLAR PLANT BY ELGIN ENERGY AT GLANMIRE

NAME	ADDRESS	SIGNATURE	REASON FOR OPPOSITION
Ashlee Petch	264 Brewongle Lane, Glanmire		No benefit to locals
Andrew Petch	264 Brewongle Lane, Glanmire		loss of productive land!
JEFF GREEN	723 BREWONGLE LANE BREWONGLE		not on Prime farming land.
JOHN HOWARD	757 BREWONGLE		Not here on quality ground
SHANE HASTINGS.	12 PARNHAM ST BATHURST		NOT ON PRIME LAND!

H110

OBJECTION FORM

To Whom It May Concern

Re: Elgin Energy P/L Solar Proposal at 4823 Great Western Highway, Glanmire

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- [✓] I support State Government Designated Zone
  - Central West (Orana) Renewable Energy Zone
- [✓] OR for all of the above reasons

Other Reasons/Comments:

Signed:

Contact Details *(optional)*

denise-hennessy@hotmail.com

[redacted]

457 Brewongle Lane

Glanmire 2795

Please return completed objection forms to glanmireactiongroup@hotmail.com

~~**Or personally at the Glanmire Action Group information session 14th-15th May 2021**~~

H 111

OBJECTION FORM

To Whom It May Concern

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- ☑ OR for all of the above reasons

Other Reasons/Comments:

Signed:

Contact Details *(optional)*

PETER MENNESSY,

0414 375565

Please return completed objection forms to glanmireactiongroup@hotmail.com

~~**Or personally at the Glanmire Action Group information session 14th–15th May 2021**~~

H 112

OBJECTION FORM

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- [✓] OR for all of the above reasons

Other Reasons/Comments:

Signed:

Contact Details *(optional)*

jacinta_bb@optusnet.com.au

526 Brewongle Lane,

Brewongle 2795

Please return completed objection forms to glanmireactiongroup@hotmail.com

~~**Or personally at the Glanmire Action Group information session 14th -15th May 2021**~~

H 113

OBJECTION FORM

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- ☑ OR for all of the above reasons

Other Reasons/Comments:

Signed:

Contact Details *(optional)*

gpbowden@optusnet.com.au
461 Brewongle Lane,
Brewongle 2795

Please return completed objection forms to glanmireactiongroup@hotmail.com

~~**Or personally at the Glanmire Action Group information session 14th-15th May 2021**~~

A

agree

H 114

OBJECTION FORM

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Other Reasons/Comments:

Signed:

Contact Details *(optional)*

EVAN DOWD

462 BRENDALE LANE

GLANMIRE NSW 2795

Please return completed objection forms to glanmireactiongroup@hotmail.com

~~**Or personally at the Glanmire Action Group information session 14th-15th May 2021**~~

P115

OBJECTION FORM

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Other Reasons/Comments:

_____

_____

_____

Signed:

Contact Details *(optional)*

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P116

OBJECTION FORM

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Other Reasons/Comments:

Signed:

Contact Details *(optional)*

19 Millview Rd

Katoomba NSW, 2780

Please return completed objection forms to glanmireactiongroup@hotmail.com

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P117

OBJECTION FORM

To Whom It May Concern

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Other Reasons/Comments:

Signed: N Willmott

Contact Details *(optional)*
Nicole Willmott
Portland, NSW, 2847

Please return completed objection forms to glanmireactiongroup@hotmail.com
Or personally at the Glanmire Action Group information session 14th -15th May 2021

P118

OBJECTION FORM

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Other Reasons/Comments:

Signed:

Contact Details *(optional)*

Fairfield Street

Portland NSW

2847

Please return completed objection forms to glanmireactiongroup@hotmail.com
Or personally at the Glanmire Action Group information session 14th -15th May 2021

OBJECTION FORM

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Other Reasons/Comments:

Signed:

Contact Details *(optional)*

Deanne Davidson - Meadow Flat

Please return completed objection forms to glanmireactiongroup@hotmail.com
Or personally at the Glanmire Action Group information session 14th -15th May 2021

P120

OBJECTION FORM

To Whom It May Concern

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Other Reasons/Comments:

Signed: E&L

Contact Details *(optional)*

Pat & Liz Reen
Meadow Flat

Please return completed objection forms to glanmireactiongroup@hotmail.com
Or personally at the Glanmire Action Group information session 14th -15th May 2021

P123

OBJECTION FORM

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Other Reasons/Comments:

Signed:

Contact Details *(optional)*

Brett Nightingale

Lithgow

Please return completed objection forms to glanmireactiongroup@hotmail.com
Or personally at the Glanmire Action Group information session 14th -15th May 2021

P 121

OBJECTION FORM

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Other Reasons/Comments:

Signed: [signature]

Contact Details *(optional)*

Belinda Peychers

Meadow Flat.

Please return completed objection forms to glanmireactiongroup@hotmail.com

Or personally at the Glanmire Action Group information session 14th -15th May 2021

OBJECTION FORM

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Other Reasons/Comments:

Signed:

Contact Details *(optional)*

Laura Nightingale
Lithgow

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OBJECTION FORM

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Other Reasons/Comments:

Signed: L McDonald

Contact Details *(optional)*

Lisa McDonald
Medlow Path

Please return completed objection forms to glanmireactiongroup@hotmail.com
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P122

OBJECTION FORM

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Other Reasons/Comments:

Signed:

Contact Details *(optional)*

K. Brazel

Marrangaroo.

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OBJECTION FORM

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Other Reasons/Comments:

Signed:

Contact Details *(optional)*

KMcManus 0427626212

Wallerawang

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OBJECTION FORM

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- ☑ OR for all of the above reasons

Other Reasons/Comments:

All of the above

Signed:

Contact Details *(optional)*

Eva Ramos

Little Hartley

Please return completed objection forms to glanmireactiongroup@hotmail.com
Or personally at the Glanmire Action Group information session 14th -15th May 2021

P128

OBJECTION FORM

To Whom It May Concern

Re: Elgin Energy P/L Solar Proposal at 4823 Great Western Highway, Glanmire

I am familiar with Glanmire, its location and landscape.

I have read Elgin's Solar Proposal brochure.

I have read Glanmire Action Group's opposition brochure.

I am against the Solar Proposal because:

(Please mark boxes)

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- ☐ Too much financial loss to Bathurst
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- ☐ It is contrary to Bathurst Regional Local Strategic Planning Statement
- ☐ I support State Government Designated Zone – Central West (Orana) Renewable Energy Zone
- ☑ OR for all of the above reasons

Other Reasons/Comments:

Signed: L. Geoghegan

Contact Details *(optional)*

Emma Geoghegan
Meadow Flat

Please return completed objection forms to glanmireactiongroup@hotmail.com

Or personally at the Glanmire Action Group information session 14th -15th May 2021

P129

OBJECTION FORM

To Whom It May Concern

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Other Reasons/Comments:

Signed:

Contact Details *(optional)*

Bailey Eller

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Or personally at the Glanmire Action Group information session 14th -15th May 2021

OBJECTION FORM

To Whom It May Concern

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  - Central West (Orana) Renewable Energy Zone
- [ ] OR for all of the above reasons

Other Reasons/Comments:

Foreign owned company doesn't stay in Australia

Signed:

Contact Details *(optional)*

Glen Harrison

Portland

Please return completed objection forms to glanmireactiongroup@hotmail.com

Or personally at the Glanmire Action Group information session 14th -15th May 2021

P131

OBJECTION FORM

To Whom It May Concern

Re: Elgin Energy P/L Solar Proposal at 4823 Great Western Highway, Glanmire

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Other Reasons/Comments:

Signed:

Contact Details *(optional)*

Leanne Purkiz

Please return completed objection forms to glanmireactiongroup@hotmail.com

Or personally at the Glanmire Action Group information session 14th -15th May 2021

OBJECTION FORM

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Other Reasons/Comments:

Signed:

Contact Details *(optional)*

MEADOW FLAT.

Please return completed objection forms to glanmireactiongroup@hotmail.com
Or personally at the Glanmire Action Group information session 14th -15th May 2021

P133

OBJECTION FORM

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Other Reasons/Comments:

Signed:

Contact Details *(optional)*

WENDY JOBLIN .

MEADOW FLAT .

Please return completed objection forms to glanmireactiongroup@hotmail.com
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OBJECTION FORM

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Other Reasons/Comments:

Signed:

Contact Details *(optional)*

LAUREN DUKES.

MEADOW FLAT.

Please return completed objection forms to glanmireactiongroup@hotmail.com
Or personally at the Glanmire Action Group information session 14th -15th May 2021

OBJECTION FORM

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- ☑ OR for all of the above reasons

Other Reasons/Comments:

Signed:

Contact Details *(optional)*

TARYN BRISBOURNE

tarynnicole@msn.com

OBJECTION FORM

To Whom It May Concern

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- ☑ OR for all of the above reasons

Other Reasons/Comments:

Signed:

Contact Details *(optional)*

antoinette@dnaautoelectrics.com.au

david@dnaautoelectrics.com.au

OBJECTION FORM

To Whom It May Concern

Re: Elgin Energy P/L Solar Proposal at 4823 Great Western Highway, Glanmire

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- ☑ OR for all of the above reasons

Other Reasons/Comments:

Signed: R Bezzina

Contact Details *(optional)*

Richard Bezzina

0404 015 225

P138

OBJECTION FORM

To Whom It May Concern

Re: Elgin Energy P/L Solar Proposal at 4823 Great Western Highway, Glanmire

I am familiar with Glanmire, its location and landscape.

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  - Central West (Orana) Renewable Energy Zone
- ☑ OR for all of the above reasons

Other Reasons/Comments:

Signed: Rita Galea

Contact Details *(optional)* ritagaleaCbigpond.com

P139

OBJECTION FORM

To Whom It May Concern

Re: Elgin Energy P/L Solar Proposal at 4823 Great Western Highway, Glanmire

I am familiar with Glanmire, its location and landscape.

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- ☑ OR for all of the above reasons

Other Reasons/Comments:

Signed: I Nelle

Contact Details *(optional)*

enisuella © icloud.com

OBJECTION FORM

To Whom It May Concern

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- ☑ OR for all of the above reasons

Other Reasons/Comments:

Signed: Jenna

Contact Details *(optional)*

jends@optusnet.com.au

P141

OBJECTION FORM

To Whom It May Concern

Re: Elgin Energy P/L Solar Proposal at 4823 Great Western Highway, Glanmire

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- ☑ OR for all of the above reasons

Other Reasons/Comments:

Signed: D. Lea

Contact Details *(optional)*

davisgha@iprimus.com.au

P142

OBJECTION FORM

To Whom It May Concern

Re: Elgin Energy P/L Solar Proposal at 4823 Great Western Highway, Glanmire

I am familiar with Glanmire, its location and landscape.

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Other Reasons/Comments:

Signed:

Contact Details *(optional)*

toytime1@bigpond.net.au

P143

OBJECTION FORM

To Whom It May Concern

Re: Elgin Energy P/L Solar Proposal at 4823 Great Western Highway, Glanmire

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Other Reasons/Comments:

Signed:

Contact Details *(optional)*

Nataline Beydoun

0422 782 634

OBJECTION FORM

To Whom It May Concern

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Other Reasons/Comments:

Signed:

Contact Details *(optional)*

Leanne Bezzina

0419 488 107

P145

OBJECTION FORM

To Whom It May Concern

Re: Elgin Energy P/L Solar Proposal at 4823 Great Western Highway, Glanmire

I am familiar with Glanmire, its location and landscape.

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- ☑ OR for all of the above reasons

Other Reasons/Comments:

Signed: [signature]

Contact Details *(optional)*

0411689316

Jean Cutajar

OBJECTION FORM

To Whom It May Concern

Re: Elgin Energy P/L Solar Proposal at 4823 Great Western Highway, Glanmire

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Other Reasons/Comments:

Signed: Testa

Contact Details *(optional)*

0408434135

Alison Testa

P147

OBJECTION FORM

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Re: Elgin Energy P/L Solar Proposal at 4823 Great Western Highway, Glanmire

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- ☑ OR for all of the above reasons

Other Reasons/Comments:

Signed: J Khanafer

Contact Details *(optional)*

Joanne Khanafer

0434 432 639.

P146

OBJECTION FORM

To Whom It May Concern

Re: Elgin Energy P/L Solar Proposal at 4823 Great Western Highway, Glanmire

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Other Reasons/Comments:

put it in the Zone

Signed:

Contact Details *(optional)*

Renee Hinkley

Please return completed objection forms to glanmireactiongroup@hotmail.com

~~**Or personally at the Glanmire Action Group information session 14th -15th May 2021**~~

OBJECTION FORM

To Whom It May Concern

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Other Reasons/Comments:

Signed:

Contact Details *(optional)*

ADAM HINKLEY

Please return completed objection forms to glanmireactiongroup@hotmail.com

~~**Or personally at the Glanmire Action Group information session 14th-15th May 2021**~~

P150

OBJECTION FORM

To Whom It May Concern

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Other Reasons/Comments:

Signed:

Contact Details *(optional)*

Kristy Warren

0411217406

rascalflat@hotmail.com

Please return completed objection forms to glanmireactiongroup@hotmail.com

Or personally at the Glanmire Action Group information session 14th -15th May 2021

P156

OBJECTION FORM

To Whom It May Concern

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Other Reasons/Comments:

Signed: C.M. Hammond

Contact Details *(optional)*

CLARE & DAVID HAMMOND

WINBURNDALE VINEYARD & WINERY

116 ST. ANTHONY'S CREEK ROAD

GLANMIRE NSW 2795

Please return completed objection forms to glanmireactiongroup@hotmail.com

~~**Or personally at the Glanmire Action Group information session 14th-15th May 2021**~~

M,

OBJECTION FORM

To Whom It May Concern

Re: Elgin Energy P/L Solar Proposal at 4823 Great Western Highway, Glanmire

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Other Reasons/Comments:

Signed: E J Kelly

Contact Details *(optional)*

153 MERSING RD

GLANMIRE

M12

OBJECTION FORM

To Whom It May Concern

Re: Elgin Energy P/L Solar Proposal at 4823 Great Western Highway, Glanmire

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Other Reasons/Comments:

PUT IT IN BUSHLAND TO CAST / CUT THE TREES DOWN.

Signed:

Contact Details *(optional)*

128 MORRISE ROAD

GLANMIRE.

NSW

M3

OBJECTION FORM

To Whom It May Concern

Re: Elgin Energy P/L Solar Proposal at 4823 Great Western Highway, Glanmire

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Other Reasons/Comments:

Signed:

Contact Details *(optional)*

136 Mersing Road
Glanmire

Please return completed objection forms to glanmireactiongroup@hotmail.com

Or personally at the Glanmire Action Group information session 14th -15th May 2021

M4

OBJECTION FORM

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- ☑ OR for all of the above reasons

Other Reasons/Comments:

C'mon guys, it'll just be so ugly there.

Signed:

Helen Reynolds

Contact Details *(optional)*

219 Mersing Rd
GLANMIRE 2795

Ms

OBJECTION FORM

To Whom It May Concern

Re: Elgin Energy P/L Solar Proposal at 4823 Great Western Highway, Glanmire

I am familiar with Glanmire, its location and landscape.

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- ☑ OR for all of the above reasons

Other Reasons/Comments:

Signed: A R. Long

Contact Details *(optional)*

287 Mersing Rd
Glanmire

M6

OBJECTION FORM

To Whom It May Concern

Re: Elgin Energy P/L Solar Proposal at 4823 Great Western Highway, Glanmire

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- [ ] It is contrary to Bathurst Regional Local Strategic Planning Statement
- [ ] I support State Government Designated Zone
  - Central West (Orana) Renewable Energy Zone
- [ ] OR for all of the above reasons

Other Reasons/Comments:

Signed:

Contact Details *(optional)*

Renae Lawson

81 Morsing Rd

Glanmire

M7

OBJECTION FORM

To Whom It May Concern

Re: Elgin Energy P/L Solar Proposal at 4823 Great Western Highway, Glanmire

I am familiar with Glanmire, its location and landscape.

I have read Elgin's Solar Proposal brochure.

I have read Glanmire Action Group's opposition brochure.

I am against the Solar Proposal because:

(Please mark boxes)

- [x] Wrong location
- [x] Location too good - gateway to Bathurst
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- [ ] It is contrary to Bathurst Regional Local Strategic Planning Statement
- [x] I support State Government Designated Zone
  - Central West (Orana) Renewable Energy Zone
- [ ] OR for all of the above reasons

Other Reasons/Comments:

Signed:

Contact Details *(optional)*

232 Mersing Rd, Glanmire

[redacted]232

peter.james232@bigpond.com

Please return completed objection forms to glanmireactiongroup@hotmail.com

~~**Or personally at the Glanmire Action Group information session 14th -15th May 2021**~~

Mq

OBJECTION FORM

To Whom It May Concern

Re: Elgin Energy P/L Solar Proposal at 4823 Great Western Highway, Glanmire

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- [ ] It is contrary to Bathurst Regional Local Strategic Planning Statement
- [ ] I support State Government Designated Zone
  - Central West (Orana) Renewable Energy Zone
- [ ] OR for all of the above reasons

Other Reasons/Comments:

Signed:

A. YOUNG

Contact Details *(optional)*

0419474283

253 MERSING RD

GLANMIRE NSW 2795

M11

OBJECTION FORM

To Whom It May Concern

Re: Elgin Energy P/L Solar Proposal at 4823 Great Western Highway, Glanmire

I am familiar with Glanmire, its location and landscape.

I have read Elgin's Solar Proposal brochure.

I have read Glanmire Action Group's opposition brochure.

I am against the Solar Proposal because:

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- [x] It is contrary to Bathurst Regional Local Strategic Planning Statement
- [x] I support State Government Designated Zone
  - Central West (Orana) Renewable Energy Zone
- [x] OR for all of the above reasons

Other Reasons/Comments:

I would be better located on less productive land.

Signed:

Contact Details *(optional)*

224 Mersing Rd.
Glanmire NSW 2795
0429328256.

P157

OBJECTION FORM

To Whom It May Concern

Re: Elgin Energy P/L Solar Proposal at 4823 Great Western Highway, Glanmire

I am familiar with Glanmire, its location and landscape.

I have read Elgin's Solar Proposal brochure.

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- [ ] It is contrary to Bathurst Regional Environment Plan 2014
- [ ] It is contrary to Bathurst Regional Local Strategic Planning Statement
- [ ] I support State Government Designated Zone
  - Central West (Orana) Renewable Energy Zone
- [ ] OR for all of the above reasons

Other Reasons/Comments:

This is prime rural land regardless of access other locations not sensitive to community and environment concerns. could be and should be considered.

Signed:

Contact Details *(optional)*

259 GLANMIRE LANE
GLANMIRE. 2795.
0437 980 986.

Please return completed objection forms to glanmireactiongroup@hotmail.com

Or personally at the Glanmire Action Group information session 14th -15th May 2021

P154

OBJECTION FORM

To Whom It May Concern

Re: Elgin Energy P/L Solar Proposal at 4823 Great Western Highway, Glanmire

I am familiar with Glanmire, its location and landscape.

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- [x] It is contrary to Bathurst Regional Environment Plan 2014
- [x] It is contrary to Bathurst Regional Local Strategic Planning Statement
- [x] I support State Government Designated Zone – Central West (Orana) Renewable Energy Zone
- [x] OR for all of the above reasons

Other Reasons/Comments:

Signed:

Contact Details *(optional)*

043 80 84 35 7

Ann Moy

86 Harris Rd Raglan NSW 2795

Please return completed objection forms to glanmireactiongroup@hotmail.com

~~**Or personally at the Glanmire Action Group information session 14th-15th May 2021**~~

OBJECTION FORM

To Whom It May Concern

Re: Elgin Energy P/L Solar Proposal at 4823 Great Western Highway, Glanmire

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I am against the Solar Proposal because:

(Please mark boxes)

- [x] Wrong location
- [x] Location too good - gateway to Bathurst – we always admired the growth of crops - even during the dry weather.
- [ ] Too much financial loss to Bathurst. The cost of running the farm goes to Bathurst Businesses.
- [x] It is contrary to Bathurst Regional Environment Plan 2014
- [x] It is contrary to Bathurst Regional Local Strategic Planning Statement
- [x] I support State Government Designated Zone
  - Central West (Orana) Renewable Energy Zone
- [ ] OR for all of the above reasons

Other Reasons/Comments:

Prime farming land is scarce in Australia, this site is good land and must remain as part of our 'food bowl'. There is an adequate supply of lower value land in the state approved zone

Signed:

Dirk Heubel

Contact Details *(optional)*

Dirk Heubel
dirkheubel@gmail.com
02 6359 5741

P160

OBJECTION FORM

To Whom It May Concern

Re: Elgin Energy P/L Solar Proposal at 4823 Great Western Highway, Glanmire

I am familiar with Glanmire, its location and landscape.

I have read Elgin's Solar Proposal brochure.

I have read Glanmire Action Group's opposition brochure.

I am against the Solar Proposal because:

(Please mark boxes)

- [X] Wrong location
- [X] Location too good - gateway to Bathurst – FOOD PRODUCING ZONE
- [X] Too much financial loss to Bathurst
- [X] It is contrary to Bathurst Regional Environment Plan 2014
- [X] It is contrary to Bathurst Regional Local Strategic Planning Statement
- [X] I support State Government Designated Zone
  - Central West (Orana) Renewable Energy Zone
- [X] OR for all of the above reasons

Other Reasons/Comments:

Signed:

Contact Details *(optional)*

ANITA HEUBEL

PETITION AGAINST THE PROPOSED SOLAR PLANT BY ELGIN ENERGY AT GLANMIRE

NAME	ADDRESS	SIGNATURE	REASON FOR OPPOSITION
Sylvia Vella	187 Shane Plc Rd Shanes Park	SVella	Inappriate place for Solar. P161
Eddie Vella	187 Shane Plc Rd Shanes Plc	EVella	Wrong area P162
David Vella	Church St Cranebrook	DVella	" " P163
Justin Vella	Shanes Park	JVella	" " P164
Nick Vella	Erskine Park.	NVella	" " P165

PETITION AGAINST THE PROPOSED SOLAR PLANT BY ELGIN ENERGY AT GLANMIRE

NAME	ADDRESS	SIGNATURE	REASON FOR OPPOSITION
Kristy Warren	780 Range Rd. Pipers Flat. 2847		Incorrect use of very productive farm land. P166
Joel Warren	780 Range rd Pipers Flat NSW 2847		Not a sight I want to see Driving along a major rd into the central west. P167
DIANE WARREN	5 CARIAMA CLOSE CAMERON PARK N.S.W 2285	D Warren	love driving into Bathurst in spring to see yellow fields not solar panels. P168
CHARLES WARREN	5 CARIAMA CLOSE CAMERON PARK N.SW 2285	C Warren	BLIGT ON THE LANDSCARE P169

06

PETITION AGAINST THE PROPOSED SOLAR PLANT BY ELGIN ENERGY AT GLANMIRE

NAME	ADDRESS	SIGNATURE	REASON FOR OPPOSITION
Amanda Tushuizen	914 Ophir Road Summer Hill Creek. NSW 2800		Loss of productive land. P170
Olivia Galea	727 Merriganowry Rd Billimari NSW 2804		Loss of productive land. P171
Zoe Reeson	381 Belgravia Road Mullion Creek 2800.		Eyesore P172
MARK REESON	381 BELGRAVIA R.. MULLION CREEK 2800		Loss of Production Land & Eyesore. P173
Peter Davis	Blue Ridge Bathurst		needs to be somewhere out of sight P174

PETITION AGAINST THE PROPOSED SOLAR PLANT BY ELGIN ENERGY AT GLANMIRE

NAME	ADDRESS	SIGNATURE	REASON FOR OPPOSITION
Renée Hinkley	56 Attunga Ave, Kiama Heights		Prime land, put solar on poorer quality land. ✓ P175
Adam Hinkley	56 Attunga Ave, Kiama Heights		Prime Land ✓ P176
Phillip Bonanno Tenielle Bonanno	2033 The Escort Way Bomaderry		Prime land ✓✓ P177
Brad McKenzie	"Ermelo" Cunnock Road, Molong		Prime land P178
Deb Aposdoff	59 Olympic Dr Orange		Prime land P179

10 160

OBJECTION FORM

To Whom It May Concern

Re: Elgin Energy P/L Solar Proposal at 4823 Great Western Highway, Glanmire

I am familiar with Glanmire, its location and landscape.

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- [x] I support State Government Designated Zone
  - Central West (Orana) Renewable Energy Zone
- [ ] OR for all of the above reasons

Other Reasons/Comments:

Signed:

Contact Details *(optional)*

0474190574

10 180

OBJECTION FORM

To Whom It May Concern

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- [x] OR for all of the above reasons

Other Reasons/Comments:

Signed:

Contact Details *(optional)*

Ben Azzopardi

Bazzopardi

ben.azzopardi20@gmail.com

Please return completed objection forms to glanmireactiongroup@hotmail.com

Or personally at the Glanmire Action Group information session 14th -15th May 2021

ID 182

OBJECTION FORM

To Whom It May Concern

Re: Elgin Energy P/L Solar Proposal at 4823 Great Western Highway, Glanmire

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- [ ] OR for all of the above reasons

Other Reasons/Comments:

Signed: Sally Bembrick

Contact Details *(optional)* 0418217216

glanmireactiongroup@hotmail.com

agree

ID 183

OBJECTION FORM

To Whom It May Concern

Re: Elgin Energy P/L Solar Proposal at 4823 Great Western Highway, Glanmire

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- ☑ OR for all of the above reasons

Other Reasons/Comments:

Signed:

Contact Details *(optional)*

0408110300

Please return completed objection forms to glanmireactiongroup@hotmail.com

~~Or personally at the Glanmire Action Group Information session 14th-16th May 2021~~

10184

OBJECTION FORM

To Whom It May Concern

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- [x] OR for all of the above reasons

Other Reasons/Comments:

eye Sore

Signed:

Contact Details *(optional)*

Cory Markwick

0432165468

10 185

OBJECTION FORM

To Whom It May Concern

Re: Elgin Energy P/L Solar Proposal at 4823 Great Western Highway, Glanmire

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Other Reasons/Comments:

Signed:

Contact Details *(optional)*

Shayne Long.

63374282.

Please return completed objection forms to glanmireactiongroup@hotmail.com

Or personally at the Glanmire Action Group information session 14th -15th May 2021

10 186

OBJECTION FORM

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Other Reasons/Comments:

Signed:

Contact Details *(optional)*

Eugenie st Raglan

Adam

0427410834

10 187

OBJECTION FORM

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- ☐ OR for all of the above reasons

Other Reasons/Comments:

Signed:

Contact Details *(optional)*

RHGA YAP

0451868143

Please return completed objection forms to glanmireactiongroup@hotmail.com

Or personally at the Glanmire Action Group information session 14th -15th May 2021

10 188

OBJECTION FORM

To Whom It May Concern

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Other Reasons/Comments:

Signed:

Contact Details *(optional)*

0427 827956

glanmireactiongroup@hotmail.com

10 189

OBJECTION FORM

To Whom It May Concern

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Other Reasons/Comments:

Signed:

Contact Details *(optional)*

0400 622 470

glanmireactiongroup@hotmail.com

OBJECTION FORM

To Whom It May Concern

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- ☑ OR for all of the above reasons

Other Reasons/Comments:

Signed: Matthew McMahon

Contact Details *(optional)*

PO Box 20
Oberon NSW 2787
0408 472 022.

H97

OBJECTION FORM

To Whom It May Concern

Re: Elgin Energy P/L Solar Proposal at 4823 Great Western Highway, Glanmire

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- ☒ OR for all of the above reasons

Other Reasons/Comments:

Signed:

Contact Details *(optional)*

4541 Great Western Hwy
Glanmire

Please return completed objection forms to glanmireactiongroup@hotmail.com

~~Or personally at the Glanmire Action Group information session 14th-15th May 2021~~

1498

OBJECTION FORM

To Whom It May Concern

Re: Elgin Energy P/L Solar Proposal at 4823 Great Western Highway, Glanmire

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- [ ] OR for all of the above reasons

Other Reasons/Comments:

THE WHOLE LOCAL AREA IS AGAINST THE LOCATION, AND NEIGHBOURS OPINIONS SHOULD BE CONSIDERED, AS WE LIVE HERE.

Signed:

Contact Details *(optional)*

5074 GREAT WESTERN HIGHWAY, GLANMIRE 2795

0419 401 046

Please return completed objection forms to glanmireactiongroup@hotmail.com

Or personally at the Glanmire Action Group information session 14th -15th May 2021

A Paul Ryan

H99

OBJECTION FORM

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Re: Elgin Energy P/L Solar Proposal at 4823 Great Western Highway, Glanmire

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- ☑ OR for all of the above reasons

Other Reasons/Comments:

Signed: M. Ryan

Contact Details *(optional)*

02 63373616

0402720383

Please return completed objection forms to glanmireactiongroup@hotmail.com

Or personally at the Glanmire Action Group information session 14th -15th May 2021

H 100

OBJECTION FORM

To Whom It May Concern

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- ☑ OR for all of the above reasons

Other Reasons/Comments:

Signed: R. Garment.

Contact Details *(optional)*

Phone - 63 373444.

0427 427 478.

Please return completed objection forms to glanmireactiongroup@hotmail.com

~~**Or personally at the Glanmire Action Group information session 14th-15th May 2021**~~

agree

H 101

OBJECTION FORM

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Other Reasons/Comments:

Signed:

Contact Details *(optional)*

JEFF & PAULA GRUBHAM

0402072334

Please return completed objection forms to glanmireactiongroup@hotmail.com

Or personally at the Glanmire Action Group information session 14th -15th May 2021

LH 102

OBJECTION FORM

To Whom It May Concern

Re: Elgin Energy P/L Solar Proposal at 4823 Great Western Highway, Glanmire

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Other Reasons/Comments:

Signed:

Contact Details *(optional)*

M. Booth

0413 684 594

4580 GWH, GLANMIRE NSW 2795

Please return completed objection forms to glanmireactiongroup@hotmail.com

~~**Or personally at the Glanmire Action Group information session 14th-15th May 2021.**~~

H 103

OBJECTION FORM

To Whom It May Concern

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- [ ] OR for all of the above reasons

Other Reasons/Comments:

Signed:

Contact Details *(optional)*

Melissa Stait

0407922997

Please return completed objection forms to glanmireactiongroup@hotmail.com

Or personally at the Glanmire Action Group information session 14th -15th May 2021

agree

H 104

OBJECTION FORM

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Re: Elgin Energy P/L Solar Proposal at 4823 Great Western Highway, Glanmire

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- ☐ It is contrary to Bathurst Regional Local Strategic Planning Statement
- ☐ I support State Government Designated Zone
  - Central West (Orana) Renewable Energy Zone
- ☒ OR for all of the above reasons

Other Reasons/Comments:

Signed:

Contact Details *(optional)*

4465 Great Western Hwy

Glanmire

Please return completed objection forms to glanmireactiongroup@hotmail.com

~~**Or personally at the Glanmire Action Group Information session 14th-15th May 2021**~~

H 105

OBJECTION FORM

To Whom It May Concern

Re: Elgin Energy P/L Solar Proposal at 4823 Great Western Highway, Glanmire

I am familiar with Glanmire, its location and landscape.

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- ☒ OR for all of the above reasons

Other Reasons/Comments:

Signed:

Contact Details *(optional)*
SIPATLOJ@aol.com

glanmireactiongroup@hotmail.com

H 106

OBJECTION FORM

To Whom It May Concern

Re: Elgin Energy P/L Solar Proposal at 4823 Great Western Highway, Glanmire

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- ☒ OR for all of the above reasons

Other Reasons/Comments:

Signed

Contact Details *(optional)*

0409132269

9 107

OBJECTION FORM

To Whom It May Concern

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Other Reasons/Comments:

Signed:

Contact Details *(optional)*

0477144569

9 108

OBJECTION FORM

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- [ ] It is contrary to Bathurst Regional Local Strategic Planning Statement
- [ ] I support State Government Designated Zone
  - Central West (Orana) Renewable Energy Zone
- [ ] OR for all of the above reasons

Other Reasons/Comments:

Signed: Peter Green

Contact Details *(optional)*

Peter anna GREEN@gmail.com.

9 109

OBJECTION FORM

To Whom It May Concern

Re: Elgin Energy P/L Solar Proposal at 4823 Great Western Highway, Glanmire

I am familiar with Glanmire, its location and landscape.

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- [ ] I support State Government Designated Zone
  – Central West (Orana) Renewable Energy Zone
- [ ] OR for all of the above reasons

Other Reasons/Comments:

Signed: A. Green

Contact Details *(optional)* 0428 653 228

PETITION AGAINST THE PROPOSED SOLAR PLANT BY ELGIN ENERGY AT GLANMIRE

NAME	ADDRESS	SIGNATURE	REASON FOR OPPOSITION
DANIEL COLLINS.	RED HILL 167 SAINT ANTHONYS. CREEK. ROAD. GLANMIRE 2795		Local. NID 288
ANNFRA. COLLINS.	RED HILL 167 SAINT ANTHONYS. CREEK ROAD. GLANMIRE 2795		Local NID 289
ADRIAN REEVE	229 LIMEKILNS RD LIMEKILNS.		LOCATION. NID 290
JOSH SARGENT	3 TODD STREET Ellington		NID 291
Keely Hunter	7 Enfield Avenue Lithgow	KH	Local, waste of good farm land, eyesore, to close to towns NID 292
117 STEVE CUTLER	12 HILLCREST AVE LITHGOW		LOCATION 292A

PETITION AGAINST THE PROPOSED SOLAR PLANT BY ELGIN ENERGY AT GLANMIRE

NAME	ADDRESS	SIGNATURE	REASON FOR OPPOSITION
DAVID. CAMENZULI	SYDNEY RD. GLANMIRE.	D. Camenzuli	NID 293
Suzanne Azzopardi	8 castlereagh Rd castlereagh		Wrong Place NID 294
TONY AZZOPARDI	CASTLEREAGH RD CASTLEREAGH		BUILD SOMEWHERE ELSE NID 295

N 85

OBJECTION FORM

To Whom It May Concern

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- [x] It is contrary to Bathurst Regional Environment Plan 2014
- [x] It is contrary to Bathurst Regional Local Strategic Planning Statement
- [x] I support State Government Designated Zone
  - Central West (Orana) Renewable Energy Zone
- [x] OR for all of the above reasons

Other Reasons/Comments:

Don't use prime farm land

Signed:

Contact Details *(optional)*

Please return completed objection forms to glanmireactiongroup@hotmail.com

Or personally at the Glanmire Action Group information session 14th -15th May 2021

N86

OBJECTION FORM

To Whom It May Concern

Re: Elgin Energy P/L Solar Proposal at 4823 Great Western Highway, Glanmire

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- [x] It is contrary to Bathurst Regional Environment Plan 2014
- [x] It is contrary to Bathurst Regional Local Strategic Planning Statement
- [x] I support State Government Designated Zone
  - Central West (Orana) Renewable Energy Zone
- [ ] OR for all of the above reasons

Other Reasons/Comments:

Biodiversity Risk.

Water Runoff – Erosion Risk.

Signed: Sally Lockhart

Contact Details *(optional)*

ajnc@bigpond.com.

Please return completed objection forms to glanmireactiongroup@hotmail.com

~~**Or personally at the Glanmire Action Group information session 14th–15th May 2021**~~

N 87

OBJECTION FORM

To Whom It May Concern

Re: Elgin Energy P/L Solar Proposal at 4823 Great Western Highway, Glanmire

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- ☐ It is contrary to Bathurst Regional Local Strategic Planning Statement
- ☐ I support State Government Designated Zone
  - Central West (Orana) Renewable Energy Zone
- ☑ OR for all of the above reasons

Other Reasons/Comments:

Prime farming land going to waste

Signed:

S. Bonano

Contact Details *(optional)*

244 Brewongle Lane

Glanmire

Please return completed objection forms to glanmireactiongroup@hotmail.com

~~**Or personally at the Glanmire Action Group information session 14th-15th May 2021**~~

N 88

OBJECTION FORM

To Whom It May Concern

Re: Elgin Energy P/L Solar Proposal at 4823 Great Western Highway, Glanmire

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- ☐ It is contrary to Bathurst Regional Local Strategic Planning Statement
- ☐ I support State Government Designated Zone
  - Central West (Orana) Renewable Energy Zone
- ☐ OR for all of the above reasons

Other Reasons/Comments:

put solar in the Orana Zone
don't use prime land
it will be a eyesore.

Signed:

P Brown

Contact Details *(optional)*

244 Brewongle Lane
Glanmire

Please return completed objection forms to glanmireactiongroup@hotmail.com

~~**Or personally at the Glanmire Action Group information session 14th - 15th May 2021**~~

N 89

OBJECTION FORM

To Whom It May Concern

Re: Elgin Energy P/L Solar Proposal at 4823 Great Western Highway, Glanmire

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- [x] I support State Government Designated Zone
  - Central West (Orana) Renewable Energy Zone
- [x] OR for all of the above reasons

Other Reasons/Comments:

Adjoining neighbour with strong concerns

Signed:

Contact Details *(optional)*

N 90

OBJECTION FORM

To Whom It May Concern

Re: Elgin Energy P/L Solar Proposal at 4823 Great Western Highway, Glanmire

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  - Central West (Orana) Renewable Energy Zone
- [✓] OR for all of the above reasons

Other Reasons/Comments:

Signed: Jackie Waterhouse

Contact Details *(optional)*

JACKIE WATERHOUSE

N 91

OBJECTION FORM

To Whom It May Concern Ray WATERHOUSE

Re: Elgin Energy P/L Solar Proposal at 4823 Great Western Highway, Glanmire

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- [x] I support State Government Designated Zone
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- [x] OR for all of the above reasons

Other Reasons/Comments:

– Concerned ADJoining Neighbour

Signed:

Contact Details *(optional)*

H 94

OBJECTION FORM

To Whom It May Concern

Re: Elgin Energy P/L Solar Proposal at 4823 Great Western Highway, Glanmire

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- ☐ It is contrary to Bathurst Regional Local Strategic Planning Statement
- ☐ I support State Government Designated Zone
  - Central West (Orana) Renewable Energy Zone
- ☒ OR for all of the above reasons

Other Reasons/Comments:

This proposal fails to meet the NSW State Significant Projects Guidelines. NSW government designated the Central West Orana Renewable Energy Zone for listed detailed beneficial reasons. This proposal ignores & undermines govt. plans for future energy co-ordination

Signed: J Williams

Contact Details *(optional)* 0418 200 154

glanmireactiongroup@hotmail.com

H95

OBJECTION FORM

To Whom It May Concern

Re: Elgin Energy P/L Solar Proposal at 4823 Great Western Highway, Glanmire

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- ☒ OR for all of the above reasons

Other Reasons/Comments:

Signed: [signature]

Contact Details *(optional)*

4467 Great Western Hwy
Glanmire

Please return completed objection forms to glanmireactiongroup@hotmail.com

~~Or personally at the Glanmire Action Group information session 14th-15th May 2021~~

ID 192

OBJECTION FORM

To Whom It May Concern

Re: Elgin Energy P/L Solar Proposal at 4823 Great Western Highway, Glanmire

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- [ ] I support State Government Designated Zone
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- [ ] OR for all of the above reasons

Other Reasons/Comments:

Signed:

Contact Details *(optional)*

Nicole Brennan
0437093059

10 193

OBJECTION FORM

To Whom It May Concern

Re: Elgin Energy P/L Solar Proposal at 4823 Great Western Highway, Glanmire

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- [ ] OR for all of the above reasons

Other Reasons/Comments:

Signed: M. Perk

Contact Details *(optional)*

MARK PERKINS.

0438 228448.

OBJECTION FORM

NIO 194

To Whom It May Concern

Re: Elgin Energy P/L Solar Proposal at 4823 Great Western Highway, Glanmire

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Other Reasons/Comments:

Signed:

Contact Details *(optional)*

Cindy Engere

2 BATHURST 2795.

Please return completed objection forms to glanmireactiongroup@hotmail.com
Or personally at the Glanmire Action Group information session 14th -15th May 2021

NIO 195

OBJECTION FORM

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- ☑ OR for all of the above reasons

Other Reasons/Comments:

Signed:

AB

Contact Details *(optional)*

MT RANKIN RESIDENT/ FARMER.

NIO 196

OBJECTION FORM

To Whom It May Concern

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Other Reasons/Comments:

Signed: T. Baell.

Contact Details *(optional)*

Toni Backhouse

Oberon.

Please return completed objection forms to glanmireactiongroup@hotmail.com
Or personally at the Glanmire Action Group information session 14th -15th May 2021

NIO 197

OBJECTION FORM

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Other Reasons/Comments:

Signed:

Contact Details *(optional)*

1176 Freemans Rd Ophir

glanmireactiongroup@hotmail.com

NIO 198

OBJECTION FORM

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Other Reasons/Comments:

Signed:

Contact Details *(optional)*

Geoff Saurine

Please return completed objection forms to glanmireactiongroup@hotmail.com

~~**Or personally at the Glanmire Action Group information session 14th-15th May 2021**~~

NO 199

OBJECTION FORM

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Other Reasons/Comments:

Signed:

Contact Details *(optional)*

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NID 200

OBJECTION FORM

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Other Reasons/Comments:

Signed:

Contact Details *(optional)*

Dawn M. Klopp
40B Hamilton St.
Eglinton, NSW 2795

Please return completed objection forms to glanmireactiongroup@hotmail.com

Or personally at the Glanmire Action Group information session 14th -15th May 2021

NID 201

OBJECTION FORM

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Other Reasons/Comments:

Signed:

Contact Details *(optional)*

E. McLEAN

McLEAN.

NSW

Please return completed objection forms to glanmireactiongroup@hotmail.com

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N10 202

OBJECTION FORM

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Other Reasons/Comments:

_____

_____

_____

Signed:

Contact Details *(optional)*

_____

_____

_____

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N10 203

OBJECTION FORM

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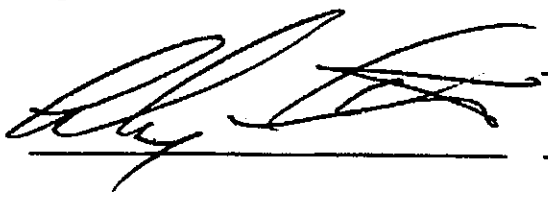
Other Reasons/Comments:

_____

_____

_____

Signed:



Contact Details *(optional)*

_____

_____

_____

Please return completed objection forms to glanmireactiongroup@hotmail.com

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N10 204

OBJECTION FORM

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Re: Elgin Energy P/L Solar Proposal at 4823 Great Western Highway, Glanmire

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Other Reasons/Comments:

Signed:

Contact Details *(optional)*

N10 205

OBJECTION FORM

To Whom It May Concern

Re: Elgin Energy P/L Solar Proposal at 4823 Great Western Highway, Glanmire

I am familiar with Glanmire, its location and landscape.

I have read Elgin's Solar Proposal brochure.

I have read Glanmire Action Group's opposition brochure.

I am against the Solar Proposal because:

(Please mark boxes)

- [X] Wrong location
- [X] Location too good - gateway to Bathurst
- [ ] Too much financial loss to Bathurst
- [ ] It is contrary to Bathurst Regional Environment Plan 2014
- [ ] It is contrary to Bathurst Regional Local Strategic Planning Statement
- [ ] I support State Government Designated Zone
  - Central West (Orana) Renewable Energy Zone
- [ ] OR for all of the above reasons

Other Reasons/Comments:

Signed:

Contact Details *(optional)*

Please return completed objection forms to glanmireactiongroup@hotmail.com

Or personally at the Glanmire Action Group information session 14th -15th May 2021

NIO 206

OBJECTION FORM

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- ☐ I support State Government Designated Zone
  - Central West (Orana) Renewable Energy Zone
- ☒ OR for all of the above reasons

Other Reasons/Comments:

_____

_____

_____

Signed:-

Contact Details *(optional)*

_____

_____

_____

NIO 207

OBJECTION FORM

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- ☐ It is contrary to Bathurst Regional Local Strategic Planning Statement
- ☐ I support State Government Designated Zone – Central West (Orana) Renewable Energy Zone
- ☒ OR for all of the above reasons

Other Reasons/Comments:

_____

_____

_____

Signed: _____

Contact Details *(optional)*

_____

_____

_____

NID 208

OBJECTION FORM

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- [ ] It is contrary to Bathurst Regional Environment Plan 2014
- [ ] It is contrary to Bathurst Regional Local Strategic Planning Statement
- [x] I support State Government Designated Zone
  - Central West (Orana) Renewable Energy Zone
- [ ] OR for all of the above reasons

Other Reasons/Comments:

Signed: A Petersen

Contact Details *(optional)*

Alan Petersen
62 Rocket St
Bathurst NSW 2795

Please return completed objection forms to glanmireactiongroup@hotmail.com
Or personally at the Glanmire Action Group information session 14th -15th May 2021

PETITION AGAINST THE PROPOSED SOLAR PLANT BY ELGIN ENERGY AT GLANMIRE

NAME	ADDRESS	SIGNATURE	REASON FOR OPPOSITION
Andrew McCabe	"Kilbrummie" 279 Barraga Rd Rocky		Wrong Location NID 209
Robyn			 NID 210 A
Margaret Ballymoade	PO Box 9330 BATHURST		Wrong Location NID 211
Paula Fitzpatrick	10 Augusta Clos Bx		Nolan Highway NID 212
BRIAN HARVEY	44A1 Winnecoo Rd Winnecoo		Glare. NID 213

PETITION AGAINST THE PROPOSED SOLAR PLANT BY ELGIN ENERGY AT GLANMIRE

NAME	ADDRESS	SIGNATURE	REASON FOR OPPOSITION
ANGELO CAUCHI.	56 NEWLANDS CRES KELSO	A. Cauchi.	Land should be left for Cattle grazing and Agriculture Purposes. NIO 214
Jeff Tuthuizen	914 Ophir Rd Summer Hill Creek		Loss of agricultural land ✓ NIO 215
Ray Borg	97 Alexander St Eglinton		Loss of productive land. & looks like Slum. NIO 216
Dianne Drummond	57 Alexander Street Eglinton	Drummond	loss of productive/agricultural land. NIO 217
BRENT GOWLAND	MURRA CLOSE BATHURST		LOSS OF GOOD FARM LAND NIO 218

PETITION AGAINST THE PROPOSED SOLAR PLANT BY ELGIN ENERGY AT GLANMIRE

NAME	ADDRESS	SIGNATURE	REASON FOR OPPOSITION
Cross Dawson	425 Mount Olive Rd Mount Olive 2787		NIO 219
Pete Evans	922 Portland Sunny Corner Rd Portland		Should'nt be done on Agricultural Productive Land NIO 220
Michael Theobald	243 Old Lachlan Rd Hobbys yards		NIO 221
Ross Wilson	3733 O'Connell Rd Bx		Inappropriate use of agricultural land. NIO 222
Dave Young	Scotts Rlose Oberon		There other Farms of power that work 24/7 NIO 223

PETITION AGAINST THE PROPOSED SOLAR PLANT BY ELGIN ENERGY AT GLANMIRE

NAME	ADDRESS	SIGNATURE	REASON FOR OPPOSITION
Samantha Ball	4181 Great Western Highway, Walang	Ball.	Im not against solar power however, pick a spot of non productive ground. NIO 224
James Thomas	4181 Great Western Highway Walang	JK Thomas	Fully utilise Solar energy from rooftop installations, without restrictions prior to building large solar farms. NIO 225
Peter Stathakopoulos	4179 Great western Hwy Walang	P. Stath	Agriculture land modification using panels seems unjust for prime land production of food. NIO 226
D Micciardo	WELLS LANE MANBARAMA		NOT ON AGRICULTURAL LAND. NIO 227
Adam Lane	1933 Oconnell Road		Should Stay Agricultural NIO 228

PETITION AGAINST THE PROPOSED SOLAR PLANT BY ELGIN ENERGY AT GLANMIRE

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NAME	ADDRESS	SIGNATURE	REASON FOR OPPOSITION
Lyn Evans.	138 Yethonme Drive. Walang.	Lyn Evans.	Good farming land NIO 229
CES EVANS	138 YETHONME DR WALANG		GOOD GROUND NO SOLAR NIO 230
PETER RAY	4313 GREAT WESTERN HWY. WALANG.		FIND A BETTER LOCATION ✓ NIO 231
CHRISTINE RAY	4313 GREAT WESTERN HWY WALANG	Christine Ray	I like to eat & put it on, bad ground where you ✓ can't grow food. NIO 232
Vanessa Mabbutt	18 Acheringa Rd Kelso		Keep good farming Land NIO 233

PETITION AGAINST THE PROPOSED SOLAR PLANT BY ELGIN ENERGY AT GLANMIRE

NAME	ADDRESS	SIGNATURE	REASON FOR OPPOSITION
LOCHLAN MATTHEWS	48 HANLANS Rd STH, BILPIN NSW		WHY DESTROY BEAUTIFUL FARMLAND WITH SUCH A HORRIBLE STRUCTURE WITH A MINIMAL LIFE SPAN. NIO 234
Tracy Sherringham	108 Clinton St Orange NSW 2800	Tracy Sherringham	Solar power is a great concept but this is the wrong location on prime farming country. What happens when the life of the solar panels is finished NIO 235
Jayne & Ruth Sherringham	1868 Norah Creek Road Gumble NSW 2865	JSherringham	Love Solar love to eat too. We have to preserve the outstanding farming country that grows food. NIO 236

PETITION AGAINST THE PROPOSED SOLAR PLANT BY ELGIN ENERGY AT GLANMIRE

NAME	ADDRESS	SIGNATURE	REASON FOR OPPOSITION
BEN BOGART	15 GLENHAVEN CRESCENT PERTHVILLE NSW 2795		PRIME FARMING LAND GOING TO WASTE NIO 237
Jasmyn Ellis	127 Hope St Bathurst 2795		NEEDS TO BE SOMEWHERE OUT OF SITE NIO 238
Zara Ellis	15 Glenhaven Crescent PERTHVILLE NSW 2795	Zara Ellis	Consideration should be made on the location and out of site to the public. Fully support but needs to be in a more discreet spot NIO 239
PAMELA WILLIS	10 CARDEW CLOSE BATHURST NSW 2795	P J Willis	CANNOT RECYCLE WHEN WORN OUT. NIO 240
STUART ELLIS	127 Hope St Bathurst 2795		Please find somewhere out of site. NIO 241

PETITION AGAINST THE PROPOSED SOLAR PLANT BY ELGIN ENERGY AT GLANMIRE

NAME	ADDRESS	SIGNATURE	REASON FOR OPPOSITION
K James	321 Rockley Rd, Pentwille	K James	Loss of agricultural ground NIO 242
S. GRECO	74 SAINT JOHNS RD	S. Greco.	" NIO 243
J N INCARROLL	360 DURRAIGH RD	J N.	" " " NIO 244
GRAHAM FRASER	205 WOLRAN RD LIOSDALE.		" " " NIO 245
Ilona PETIT	32 SINKER CRT CHARENCE TOWN		" " NIP 246

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PETITION AGAINST THE PROPOSED SOLAR PLANT BY ELGIN ENERGY AT GLANMIRE

NAME	ADDRESS	SIGNATURE	REASON FOR OPPOSITION
Tony Gillbanks	10 Byrne Ct Kelso		wrong location and eyesore for the town NIO 247
Shae Gillbanks	10 Byrne Ct Kelso	S Gillbanks	wrong location and eyesore for the town NIO 248
Terry Gill	1 Chivers close, Lithgow		wrong location, does not promote infrastructure for bathurst or surrounding towns NIO 249
HAYDEN SIMMONS	17 Ferro St Lithgow		too close to town, waste of good land NIO 250
Brandan Horner	7 Enfield Ave. Lithgow		Eyesore, to close to towns, waste of good farm land, local NIO 251
Anthony Boza.	11 Munjowee circle Lithgow 2790		Eyesore NIO 252

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PETITION AGAINST THE PROPOSED SOLAR PLANT BY ELGIN ENERGY AT GLANMIRE

NAME	ADDRESS	SIGNATURE	REASON FOR OPPOSITION
DAVID ALCE	RAY Rod EPPING		LETS LEAVE THE LAND FOR GRAZING. NIO 253
Nereda Alce	" "	NAlce	Dont ruin farming land or spoil this town for the people that live there NIO 254
MARIE ALCE	MINCHIN AVE, HOBARTVILLE		PROTECT THE LAND FROM FURTHER DESTRUCTION. SAVE OUR FARMING LAND! NIO 255
Peter Alce	Minchin avenue Hobartville		The land is prime farming land. Keep it for just that! NIO 256
Kristy Alce	Ray Road, Epping NSW	KAlce	Please save one of our great assets! No more destruction of prime farming land! NIO 257

PETITION AGAINST THE PROPOSED SOLAR PLANT BY ELGIN ENERGY AT GLANMIRE

NAME	ADDRESS	SIGNATURE	REASON FOR OPPOSITION
M STAIT	"ARMITAGE" RAGLAN		NID 258
Chris Stait	"ARMITAGE" CROSS ST. Raglan	CStait.	It's good grazing country. Position - entrance to town. NID 259
Peter Stait	"ARMITAGE" CROSS ST RAGLAN		Inappropriate visual impact on prime agricultural gateway. NID 260
Linda Reid	Ray Rd, Epping	Linda Reid	The area should remain as grazing. It would ruin the aspect. NID 261
DAVID REID	Ray RD EPPING		Lets continue to use Land for its Purpose. NID 262

PETITION AGAINST THE PROPOSED SOLAR PLANT BY ELGIN ENERGY AT GLANMIRE

NAME	ADDRESS	SIGNATURE	REASON FOR OPPOSITION
MARG. DUNKLEY	69 Evenmden Rd Bathorst.	dDunkley.	wrong place NIO 263
JANE BARKLIMORE	171 Hartwood Ave, Rolin Hill	Janet. Barklimore	Don't want prime farmland. NIO 264
Julianne Sherby	3 McKell St West Bathurst		This is prime agricultural land and needs to be used for that NIO 265
KEVIN PORTER	"WARRAWEE" YETHOLME		PRIME FARMING LAND. PUT SOLAR ON POOR QUALITY LAND. NIO 266
IAN NANCARROW	GLENORA EGLINTON		prime farm land, — NIO 267

PETITION AGAINST THE PROPOSED SOLAR PLANT BY ELGIN ENERGY AT GLANMIRE

NAME	ADDRESS	SIGNATURE	REASON FOR OPPOSITION
Polly Bonanno	244 Brewongle Lane Glanmire NSW		This is the wrong place for solar plant ✓ NIO 268
MAXINE MAY	33 CYPRESS CRESCENT KELSO NSW		Wrong place NIO 269
KERRY McRAE	9 CANBEWARRA COURT KELSO		Using prime agricultural land. NIO 270
Suja Pilu	14 Lotus Street Bathurst 2795		get a life NIO 271
Roscoe	4 COLVILLE St Bathurst 2795		Wrong place NIO 272

PETITION AGAINST THE PROPOSED SOLAR PLANT BY ELGIN ENERGY AT GLANMIRE

NAME	ADDRESS	SIGNATURE	REASON FOR OPPOSITION
Michelle Dunn	492 Lagoon Road Perthville.		Not a very nice entrance into Bathurst. N10 273
Caity Fuller	7 Sundown Dr. Kelso		Not a nice entrance into bathurst. N10 274
LES HAYES	MUSWELLBROOK		DONT SPOIL WHAT WE COME TO ENJOY N10 275
Gail Hayes.	32 Foley St. Musswellbrook 2333	L Hayes.	More Polution for everyone to see. N10 276
Robyn Staader	4 Eltham DRIVE KELSO		THEY WILL BE AN EYESORE N10 277

PETITION AGAINST THE PROPOSED SOLAR PLANT BY ELGIN ENERGY AT GLANMIRE

NAME	ADDRESS	SIGNATURE	REASON FOR OPPOSITION
A McCulloch	Piper St		Yes, then leave an eyesore to rusty rot after 10 years. NO WAY. NID 278
Damon Clark	Pioneer St Bathurst 2795		Loss of farmland, visual pollution. NID 279
John KBLONSKIS	Peacock St Eglinton		To be convinced, I need to see a recycle method. NID 280
GARTH INNES	DIAMOND CLOSE KELSO		VISUAL POLLUTION & NON RECYCLABLE AT USEFUL END. NID 281
J. SORDAN	LITTLE ACRES WATTLE FLAT		NID 282

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PETITION AGAINST THE PROPOSED SOLAR PLANT BY ELGIN ENERGY AT GLANMIRE

NAME	ADDRESS	SIGNATURE	REASON FOR OPPOSITION
B Lin	773 TARAM RD BOMADALE		NIO 283
N. Green	28 Wentworth Drive Kelso	N Green	Not on prime farming land NIO 284
M. Osborne	28 Wentworth Dr. Kelso	M. Osborne.	Not on prime farming land. NIO 285
T. HEMSLEY	390 NAPOLEON REEF RD. WALANG		WRONGFUL USE OF AGRICULTURAL LAND. NIO 286
K. Gittany	385 NAPOLEON REEF RD WALANG		NOT PRIMARY PRODUCTION LAND. NIO 287

Document 2: Sustainable Energy Generation Grp., LLC v. Photon Energy Projects B.V.

- url - link

SUSTAINABLE ENERGY GENERATION GRP., LLC V. PHOTON ENERGY PROJECTS B.V.

URL link to case:

Sustainable Energy Generation Grp., LLC v. Photon Energy Projects B.V., Civil Action No. 8524-VCP | Casetext Search + Citator



Photograph of subject site December 2020 – Canola crop

Document 3: Video https://www.youtube.com/watch?v=Ws0fHO4Iras

SAY NO TO 'GLANMIRE SOLAR FARM' - THE HIGH COST OF RENEWABLES ON CULTIVATION LAND

VIDEO – URL LINK

https://www.youtube.com/watch?v=Ws0fHO4lras



Photograph of solar array

Document 4: Photo Identifying Treed Area to West of Site

Document 5: [redacted] Assertions – BMEC 15.09.2022

15 September 2022

223 Liverpool Street,
Darlinghurst, Sydney

RE: Glanmire Solar Farm

Dear Polly,

Thank you for your recent correspondence regarding a request for a meeting with Elgin Energy and the Glanmire Action Group.

We are to hold a meeting in the coming weeks. This meeting is to follow on from recent 'near neighbour' discussions about the proposed site layout and findings from recent assessments. As discussed at our most recent 'near neighbour' meetings, follow up individual discussions are to occur as required to discuss individual areas of interest.

Our next meeting is to continue with, and build upon, our ongoing community consultation with the Action Group and its members, including:

- A meeting at the home of Peter Hennessy with Action Group members (prior to its formation);
- A drop-in day at the site of the Solar Farm over two days where we had detailed discussions with many Action Group members;
- The Royal Bathurst Show – where Elgin Energy had a stall over two days and met with members of the Action Group. Peter Hennessy also attended and provided us with a list people who had concerns with the Project at this time;
- A six hour Community Information Drop-in Session at Bathurst Memorial Entertainment Centre (BMEC) on 18th May – which was attended by several Action Group members and involved discussion;
- Members of the Action Group were invited to each CCC meeting and attended the first two (of four) meetings. Unfortunately, no members attended the last two meetings which involved DPE and other expert consultants. These meetings went for three hours (or more) and provided opportunity for detailed consultation on the Project and provided a constructive space to raise specific concerns. CCC minutes were provided to the Action Group as requested; and
- Where the Project Team has been provided with contact details, letters have been delivered, and phone call and email conversations have been held with members of the Action Group.

In relation to your comments regarding the Community Information Session at Bathurst Memorial Entertainment Centre (BMEC) on 18 May 2022, we spent a considerable amount of time with the Action Group answering questions. In our view, once the tone and the nature of the questions became unreasonably aggressive and a member from the group began filming without permission, the situation was considered no longer constructive, and we moved away to engage with a Western Advocate Journalist.

The Project Team were at BMEC until 6:00pm on 18 May 2022, meeting members of the public and other members of the Action Group, including 'near neighbours'. We confirm that conversations,

questions, and concerns were recorded and overall, we found the information session to be valuable. We remain happy to consult with anyone in relation to the Project.

As highlighted above, we will be in touch to confirm a date for our next meeting. We are currently seeking an independent party to chair this meeting. At this stage the likely venue will be BMEC, in the conference meeting room where the CCC meetings took place.

We will be in touch via email to arrange a time as soon as details are confirmed.

Should you have any questions in the meantime, please give [redacted] from NGH a call on [redacted] or email engage@nghengage.com.au

Kind regards,

[redacted]

General Manager – Australia
Elgin Energy

Document 6: Elgin Energy Brochure

Will there be a Community Benefit Fund?

Elgin Energy aims to deliver a community benefit fund on every project and is committed to delivering a Community Benefit Fund if this project proceeds to energisation. There are several successful examples of the delivery of Community Benefit Funds from renewable energy projects across Australia.

Funds are usually based on the project owner paying a fee to the local community organization on a fixed sum per MW basis. This fund is then distributed to suitable local projects/initiatives. We are keen to hear the community's thoughts in relation to this and invite residents to share their views on suitable local projects/initiatives.

What are the next steps?

Following this first stage of initial preliminary consultation with local landowners, Council, and the local member, a project layout can be finalised and included in the Preliminary Environmental Assessment (PEA). The PEA will be lodged with the Department of Planning Industry and Environment (DPIE).

Following consideration of our PEA, DPIE will issue the Secretary's Environmental Assessment Requirements (SEARs) which will define the requirements for a detailed Environmental Impact Statement (EIS) for the project, which is the key component of the formal Development Application.

Should we progress to this stage, further consultation will be undertaken during the preparation of the EIS and also during the Development Application assessment process.

About Elgin Energy

Elgin Energy is a leading international solar developer with operations in Australia, UK, and Ireland.

To date, we have delivered 21 projects including the largest operational solar farms in Scotland (13MW) and Northern Ireland (46MW). As of this year, we have secured consents on close to 60 projects (700MW+). Our success rate in achieving planning approval is attributable to the work of our team in collaboration with local communities.

In 2019, Elgin Energy established an Australian office in Sydney to begin development. Elgin Energy takes a long-term development approach across our selected markets and our business model was designed for both a subsidy and post-subsidy market.

ELGIN ENERGY

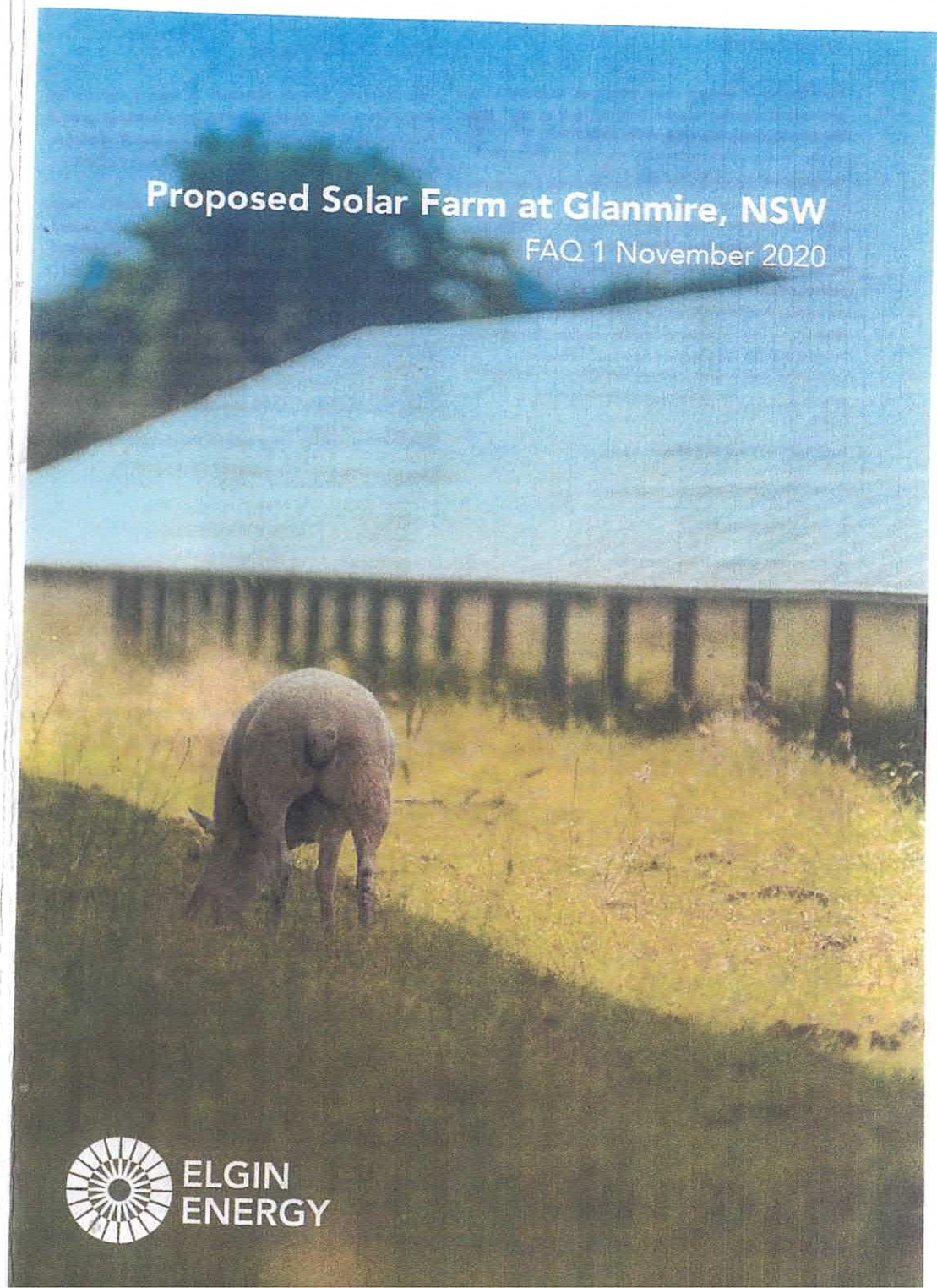
We would be grateful for the opportunity to assist with general enquiries or to arrange a time to discuss the project in person.

Elgin Energy Pty Ltd.
223 Liverpool Street,
Darlinghurst, Sydney
NSW 2010

W: www.glanmiresolarfarm.com.au
The website will be published shortly
T: 1800 947 933
E: shane.melotte@energyforms.com.au

Proposed Solar Farm at Glanmire, NSW

FAQ 1 November 2020



ELGIN ENERGY

Introduction

Elgin Energy is seeking views from local residents on the proposal to develop a solar farm on land at 4823 Great Western Highway, Glanmire, NSW 2795.

The project is categorised as a State Significant Development under environmental legislation and therefore the Development Application will be assessed by the Department of Planning, Industry and Environment. Elgin Energy will be undertaking community and stakeholder engagement throughout the process.

Elgin Energy have engaged specialist consultants Energy Forms to assist with the Development Application process.

Key project details

Location: 11km east of Bathurst township

Project size: 60MW (ac)

Site area: 186 hectares

Development footprint: 140 hectares

Grid connection: Existing 66kV line

Construction duration: 12 months

Grazing: Sheep will continue grazing once operational

Project Overview

Glanmire solar farm is proposed to have a capacity of approximately 60 megawatts (MW)(ac) comprising ground mounted solar photovoltaic (PV) modules (panels) similar to those installed on rooftops around Australia.

Glanmire solar farm is proposed on a site at 4823 Great Western Highway, Glanmire, NSW 2795. This site is located approximately 11km east of the township of Bathurst and approximately 4.5km east of Raglan.

The project will cover a development footprint of approximately 140 hectares on land that is currently used for grazing with a small area used for intermittent cropping. The project is aiming to continue sheep grazing within the development footprint of the project once operational.

Reasons for choosing the proposed site include:

- High solar irradiance
- Cost-effective grid connection with capacity
- Relatively flat and clear land with few environmental constraints
- Not identified as highest quality agricultural land or 'Biophysical Strategic Agricultural Land'.



Physical elements of a solar farm

The following components are proposed for this solar farm:

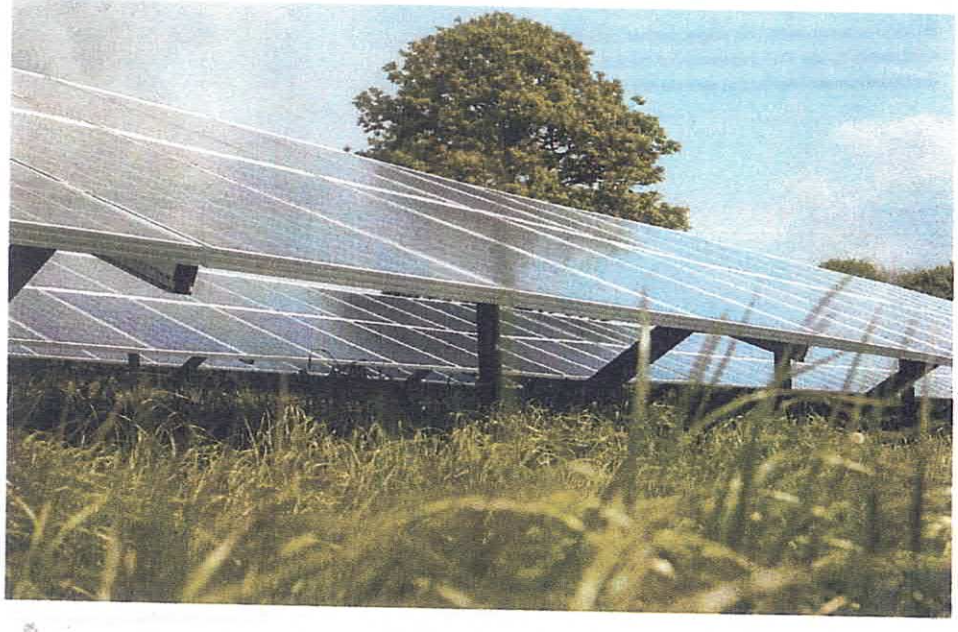
- Solar PV modules, either on a fixed-tilt or single-axis tracking system
- Inverters
- Transformers
- Underground cabling from the panels/inverters to the substation
- A substation to connect the project to the electricity network
- An upgrade to existing powerlines from the site back to the substation located in Raglan
- Access roads from the local road network and internal access tracks
- Fencing and CCTV around the perimeter.

The project may also include a battery energy storage system (BESS).

Benefits of the project

The project will provide a number of benefits including:

- Opportunities for both local and regional businesses to support delivery and operation of the project
- Employment opportunities, with approximately 150 employees needed during the construction period of approximately 12 months, and approximately 3 ongoing jobs during the operational phase
- Contributing to progress towards the NSW and Commonwealth government renewable energy targets
- Annual reductions in greenhouse gas emissions and generation of enough clean electricity to power approximately 24,000 NSW homes; and
- Ongoing community benefits through a local community benefit scheme.



Document 7: P. O'Hara Personal Health Impact

From: Peta O'Hara <Peta.Ohara@outlook.com>
Date: Sunday, 11 December 2022 at 11:11 pm
To: karyn@goindigo.com.au <karyn@goindigo.com.au>
Subject: Email - Brewongle Solar Farm

mailto:karyn@goindigo.com.au

Hi Karyn,

Please find my email below.

Peta

In 2017, we had been living in our dream home for less than two years, a small property in Brewongle on the outskirts of Bathurst, surrounded by prime farming land where we had hoped to raise our young family peacefully. One afternoon we received a notification in our letterbox from a foreign owned company called Photon Energy, informing us that they were proposing to build a 500-acre solar farm across the road from our home. We spent the next year opposing this proposal which took a huge toll on our family and our community.

This proposal had an impact on approximately 50 residents in the Brewongle area. Our community banded together immediately to oppose this proposal. We were lucky to have such a tight knit, determined and supportive group of people. My husband and I volunteered for major roles on the committee that was formed to oppose the proposal. For the next year we held regular community meetings at our home, wrote letters to all levels of government pleading for help, meeting with local, state and federal government members and other various stakeholders, held meetings with Photon Energy and the community at our home for their "community consultation" process and spent over $20,000 employing various specialists (e.g., town planners, agronomists etc) and working with the local council to find an alternative, more appropriate site.

Trying to raise a young family and run business at the same time as opposing the proposed development for over a year had an enormous impact on me personally, both medically and emotionally. I became so stressed that I couldn't sleep. I became very emotional and developed medical issues following this prolonged period of intense stress, affecting my ability to function as a business owner and Mum for a period of time.

We were opposing a proposal introduced by a foreign owned company with no ties to, knowledge of or interest in our local community, which was difficult to say the least. Their focus was purely on the profits that they would reap and they readily admitted this. They also readily admitted that once approved, they would on sell the proposed project for another company to build, making substantial profits in the process. With no laws in place to prevent such developments being proposed, the state government is leaving rural communities exposed and vulnerable to these companies who are profiteering from the governments focus on reducing net carbon emissions. I understand and support this focus, but there needs to be stringent guidelines in place which are adhered to, preventing these developments from even being proposed in unsuitable areas. By unsuitable, I mean not on prime agricultural land which has been cultivated for decades, not close to residential areas and not where there are heightened risks and implications for neighbouring properties.

Document 8: Glanmire Action Group Brochure

"At this place, the natural elements – the quality and health of the soil, the temperature range throughout the various distinctive seasons and the rainfall combine and interact to render this land with great productive potential."

David Harbison, Agronomist, DR Agriculture Pty Ltd

The proposed solar farm on the southern side of the Great Western Highway on the proponent's property is sited entirely on prime agricultural land and in complete view of a large number of neighbouring properties. It is considered that the proposal is incompatible with the RU1 Primary Production provisions and objectives. This coupled with the potential heritage, air and road safety and water pollution concerns, the site identified for the future solar farm is far from ideal and the proponents should consider other more suitable locations.

Excerpt from a letter by Anthony Daintith
Principal, Anthony Daintith Town Planning Pty Ltd

Glanmire Action Group

Who We Are

Glanmire Action Group consists of Brewongle/Glanmire residents and wider community residents.

Our group is formed to:

- Protect our neighbouring farms/assets
- Protect our land and landscapes
- Protect Bathurst's beauty
- Protect community financial benefits
- Protect Bathurst Regional Environment Plan – 2014
- Ensure proper and full use of Central West Orana Renewable Energy Zone

We are TRULY INFORMED Green.
We want our land use and renewables.
We want compatible planning.

Support us. Join our group. Learn more.

Jo Petch
Secretary/Coordinator, Glanmire Action Group
Email: jo.petch17@gmail.com

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The gateway to Bathurst

OBJECTION TO

PROPOSED SOLAR PLANT

4823 GREAT WESTERN HIGHWAY

BY GLANMIRE ACTION GROUP

Bathurst is regarded as 'the gateway to the Central West'. The picturesque rural scene that exists in the area has existed at the approach to Bathurst through until now. The vision is appropriate for one entering the first inland city over the mountains. It is rightly promoted as a most significant city rich in history, heritage and agriculture.

In recent times, most substantial sums have been spent by nearby residents improving their homes and their holdings. All of this infrastructure improvement has occurred at the gateway to Bathurst and is consistent with Bathurst Regional Development Plan. This picturesque and productive locality is very much part of Bathurst's beauty and heritage and deserves protection.

The proposed site for a solar farm is 4823 Great Western Highway, Glanmire. 186 hectares of prime agricultural land that has demonstrated its capacity to produce a spectacular crop. While the owner lives elsewhere, the farming tenant lives locally. He buys and maintains machinery, fertilises the land, cultivates it, and harvests the produce. The natural product may vary from canola, wheat, oats, barley or to the less productive sheep and cattle but all have one thing in common, that is, feeding our population. All his spending and all his produce benefits the local community. Instead of young farmers progressing or farming this land, it is proposed to fill the area with 250 football fields worth of solar panels.

The pursuit of a solar plant on this site will result in a blight on the land and its surrounds and financially impact negatively upon the city of Bathurst and upon local residents. The land will lose the capacity to produce an annual grain crop. In reality, say 560 tonnes of grain, enough produce to produce 670,000 packets of pasta for example. A most substantial loss. These huge annual losses will continue for the duration of the solar lease – PERHAPS 40 YEARS.

This proposal is an imposition upon Bathurst and residents for an unspecified period. Unspecified both as to the option period and as to the lease period and this has the potential to cause a most significant loss to residents and to Bathurst. The irrational secrecy maintained by the proponent shows disregard to residents and their desire to plan and their desire for certainty.

'Energy Forms' will represent 'Elgin Energy' to assist with a Development Application for the proposed solar farm and battery storage project at 4823 Great Western Highway, Glanmire.

"There is, in this country, a finite and indeed rather limited area... this land is a most valuable commodity to agriculture."

DAVID HARBISON, AGRONOMIST, DR AGRICULTURE PTY LTD



The typical Australian farmer can strut the world stage for efficiency and productivity. They are amongst the best in the world.

Will our State Government respect our farmers and their jobs?
Will it stop Elgin here and send it to the right location?

Before.

ELGIN ENERGY

WHO IS ELGIN ENERGY?

Elgin Energy is said to be in England and Ireland. Elgin Energy Pty Limited, a mere subsidiary, was incorporated in 2019. Initially its main business was said to be in Queensland but then Darlinghurst in Sydney but it is currently in neither of those places. It is now said to be in Victoria. Its address was not provided. In its literature, Elgin Energy claims it *"is a leading international solar developer with operations in Australia, UK and Ireland"*.

But we know:

- **It has no development in Australia.**
- **Its only presence in Australia is Elgin Energy P/L. A limited liability company.**
- **Its assets are?**
- **It's research is near nil.**
- **It calls Bathurst 'a township'.**

It has not researched this land. It has not turned a sod of soil. It simply arrived in our country, picked the site off a map and stuck a flag on this block.

THE SOLAR PROPOSAL

The proposal will include:

- **the equivalent of 250 football fields of solar panels, together with inverters, transformers, and a substation;**
- **a high wire fence with CCTV cameras around the perimeter.**

THE RESULT

- the obliteration of food production
- the channelling of not just an owner's rent elsewhere, but the tenant's as well.

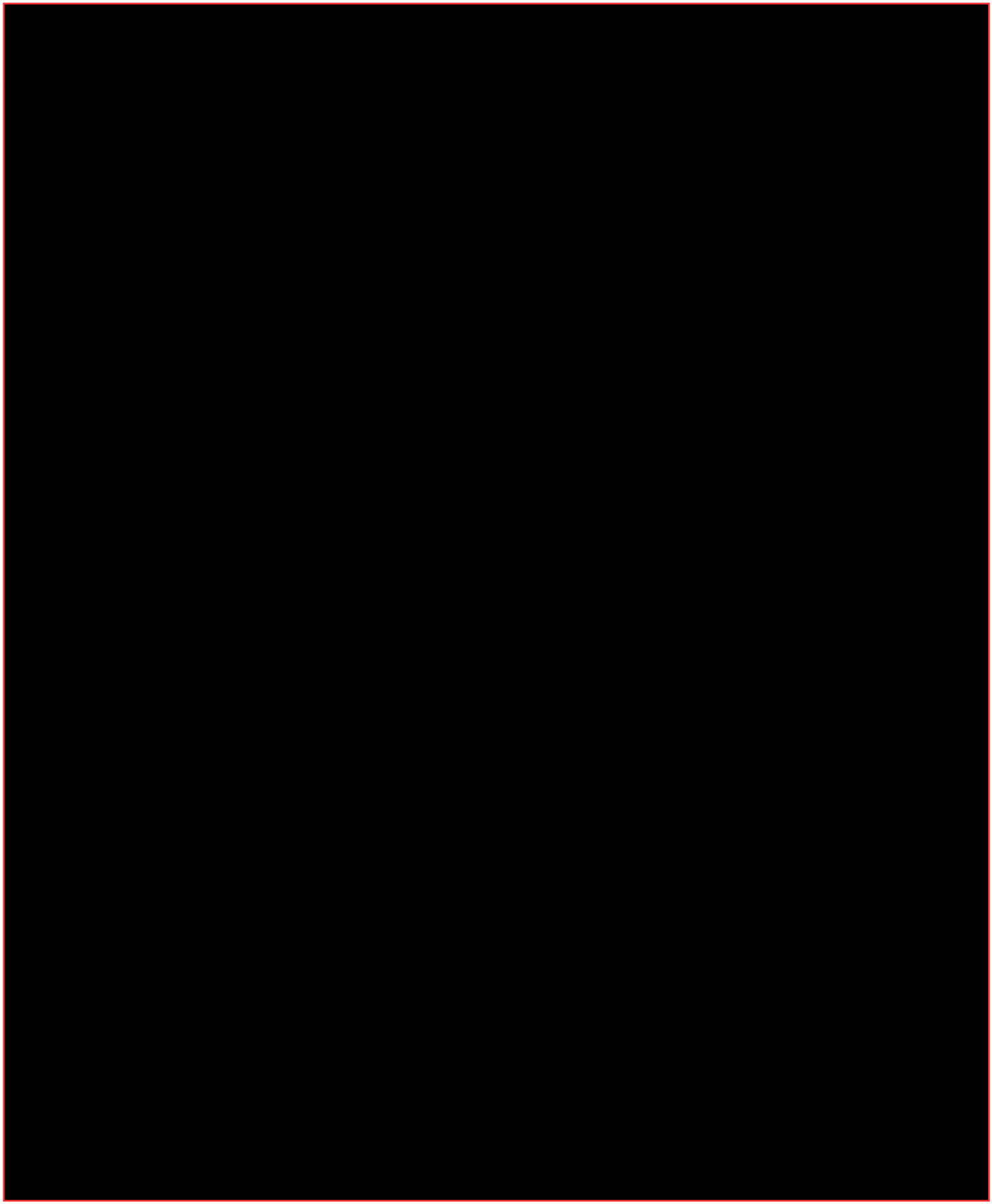
ELGIN SAYS:

"No plan for power to Bathurst. Just feed it into the grid."
It *"MAY employ approximately three people."*



After.

Document 9: P. Bonanno Health Impact



Document 10: A. Daintith Town Planner Report 11.12.2020

ANTHONY DAINTITH
TOWN PLANNING

4 Isaac Drive, Orange
145 Keppel Street, Bathurst
PO Box 1975
Orange NSW 2800
ABN: 46 121 454 153
Phone: 0408249700
Email: anthony@adtp.com.au

Our Ref: 2021-080

11 December 2020

Mr Peter Hennessy
Glanmire Action Group
C/- peter_hennessy@hotmail.com

Dear Peter

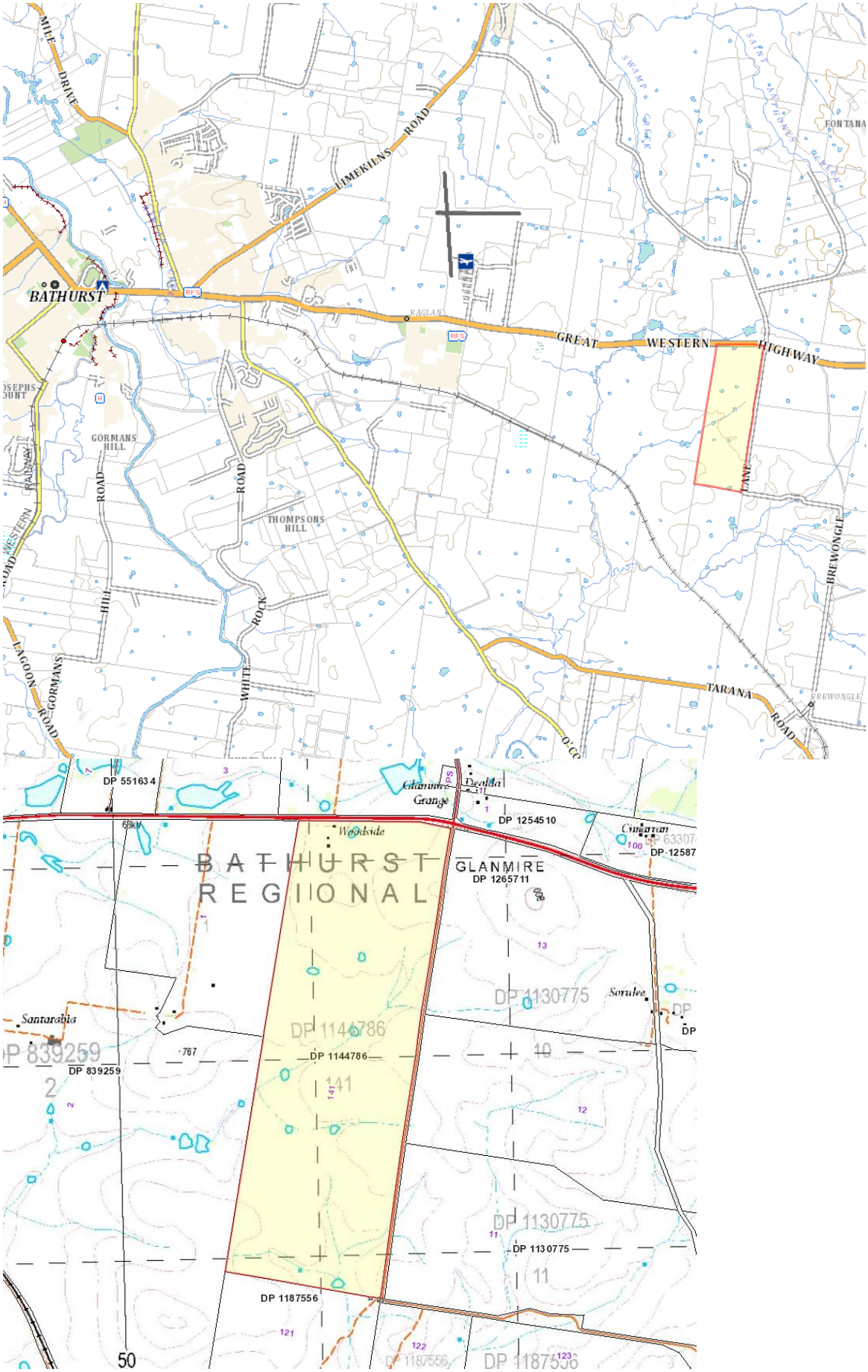
RE: PROPOSED SOLAR FARM
"WOODSIDE", 4823 GREAT WESTERN HIGHWAY, GLANMIRE
LOT 141 DP 1144786

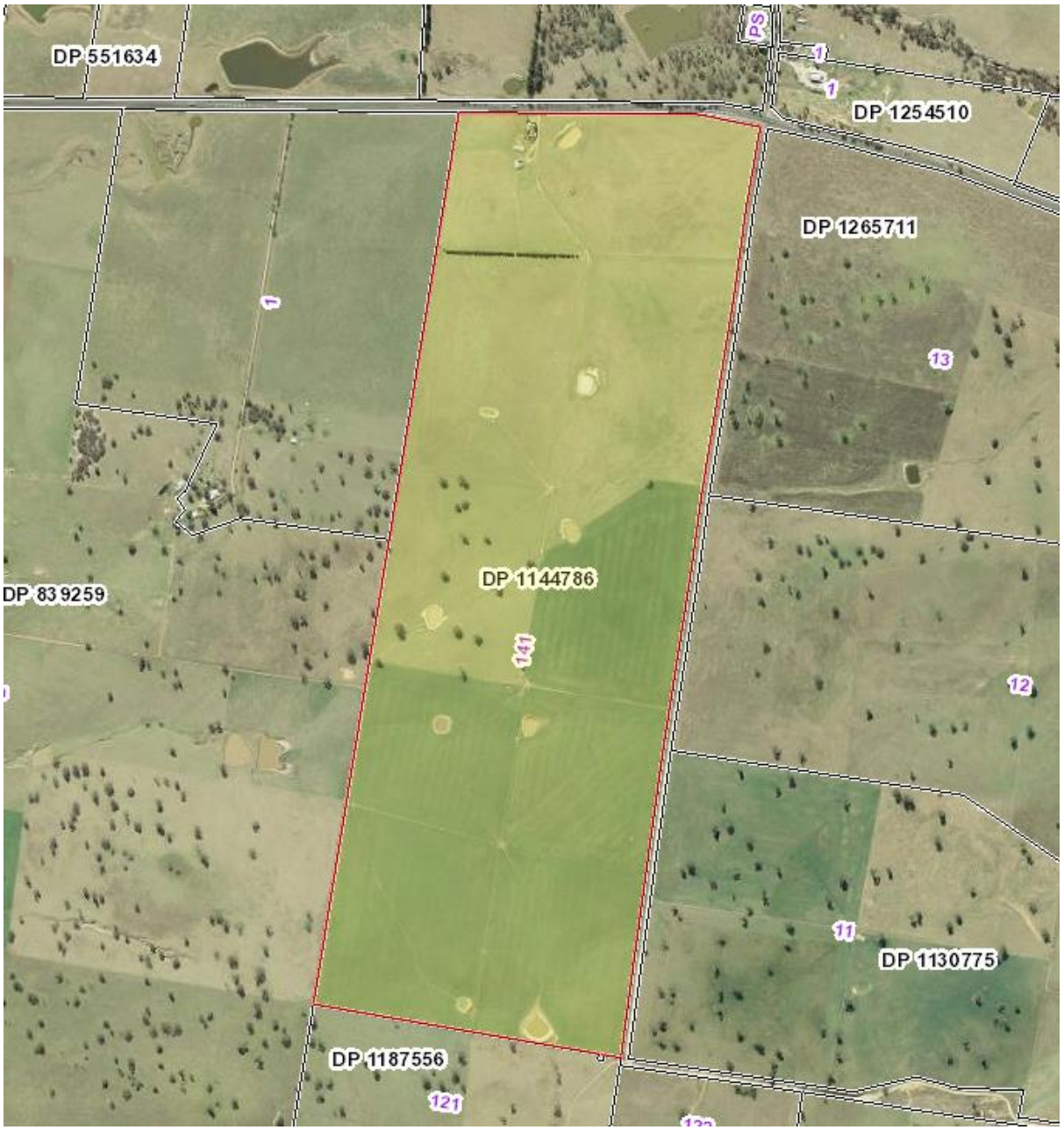
Reference is made to the solar farm proposed on the subject land at Brewongle by the development group "Elgin Energy". The proposed solar farm includes the installation of 60 MW (ac) solar farm on approximately 140 hectares of land. The subject land is located 11 km east of Bathurst and 4.5km east of Raglan.

"Woodside" consists of:

- The Woodside homestead and associated sheds & infrastructure that fronts onto the Great Western Highway (770m frontage).
- The subject land has a total area of 185.8ha.
- There is 2.4km frontage to Brewongle Lane.
- The land consists of Class 2 and 3 Agricultural Land.
- The land is generally cleared and is slightly undulating country.

Following are maps of the subject land.


BATHURST
GREAT WESTERN HIGHWAY
LIMEKILNS ROAD
MILE DRIVE
GORMANS HILL ROAD
THOMPSONS HILL
WHITE ROCK ROAD
LAGOON GORMANS ROAD
TARANA ROAD
BREWONGLE
LANE
BATHURST REGIONAL
GLANMIRE
DP 1265711
DP 1254510
DP 1255871
DP 551634
DP 1144786
DP 1130775
DP 1187556
DP 839259
Glanmire Grange
Dredda
Woodside
Santarabia
Sorulee
Cintaran
50


DP 551634
DP 1254510
DP 1265711
DP 1144786
DP 839259
DP 1130775
DP 1187556
PS
1
1
13
141
12
11
121

PROPOSED SOLAR FARM LOCATION

The following plans have been prepared with respect the proposed solar plant on the southern side of the Great Western Highway at Glanmire:

Figure 1 – Cadastral plan that indicates the location of the "Woodside" holding and the location of the proposed solar farm. The plan also includes the location of the existing dwellings within a 1km, 2km and 3km radius of the proposed solar farm.

Figure 2 – Provides a cadastral plan as indicated in Figure 1, but with an aerial photo overlay.

Figure 3 – Provides a cadastral plan as indicated in Figure 1, but with a topographical plan overlay

Figure 4 - Provides a cadastral plan as indicated in Figure 1, but with an Agricultural Suitability overlay

As depicted in the **Figures 1-4** as articulated above, there are approximately 57 dwellings within a 3km radius of the proposed solar farm. This is broken down as follows:

Distance from Solar Plant	Number of Dwellings
0-1km	6
1-2km	22
2-3km	29
Total	**57**

Because of the land topography of this proposed site (relatively level open country) the majority of the affected residences will have the 2.5m high fence and solar panels within view.

The subject land is zoned RU1 Primary Production under the provisions of the *Bathurst Regional Local Environmental Plan 2014 (LEP)*. The minimum lot size under the LEP is 100ha.

The objectives of the RU1 Primary Production zone are:

- *To encourage sustainable **primary industry production** by maintaining and enhancing the natural resource base.*
- *To encourage diversity in primary industry enterprises and systems appropriate for the area.*
- *To minimise the fragmentation and alienation of resource lands.*
- *To **minimise conflict between land uses** within this zone and land uses within adjoining zones.*

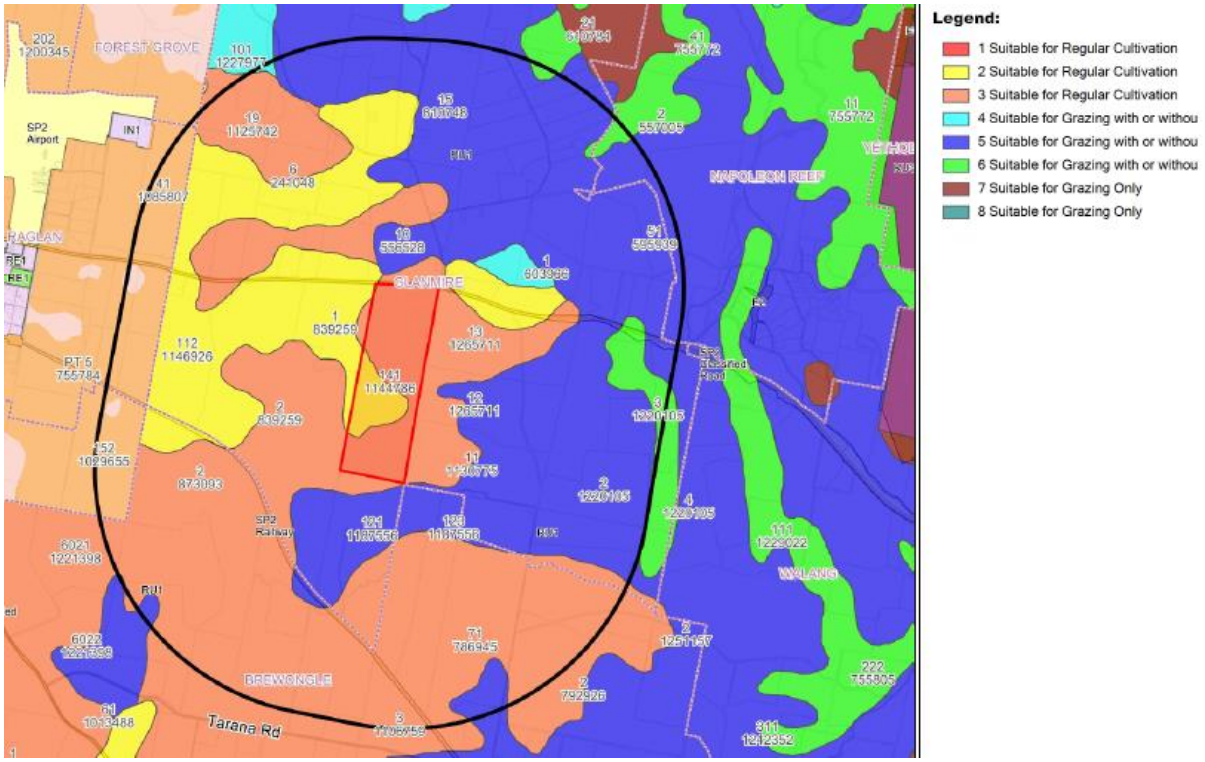
- *To maintain the **rural and scenic character** of the land.*
- *To provide for a range of **compatible land uses that are in keeping with the rural character of the locality**, **do not unnecessarily convert rural land resources to non-agricultural land uses**, minimise impacts on the environmental qualities of the land and avoid land use conflicts.*

Based on an assessment of the objectives of the zone, it can be concluded that the proposed solar plant:

- Does not encourage sustainable primary industry production (there will be a loss of 140ha of prime "Class 2 & 3" agricultural land. The land has historically been cropped with a variety of grain crops along with grazing of livestock.
- Will lead to conflict between non compatible land uses.
- Is not a compatible land use that is in keeping with the rural and scenic character of the locality.
- It will unnecessarily convert rural land resources to non-agricultural land uses.
- The scenic quality to the "gateway" entrance to Bathurst will be negatively impacted by the construction of the solar farm. The entry is characterised by open farming land and then the Bathurst urban area with the famous Mount Panorama in the background that provides an ideal backdrop to the landscape that is synonymous with Bathurst.
- The picturesque and productive locality is very much part of Bathurst's beauty and heritage and deserves protection.

The minimum lot size under the LEP allows for a 100ha minimum lots in this area for the purpose of a dwelling house (subject to the lodgement of a development application). There has been a number of subdivisions approved in this locality and there is the potential for more (this will have the impact of increasing the number of residential receptors).

The proposed solar plant location is mapped **Class 2 & 3** land (refer to the map below), that been "Suitable for regular cultivation" – Class 2 & 3 land is considered to be "**Prime Agricultural Land**". Class 4 to Class 8 is considered to be "Non-Prime Agricultural Land". This further supports the non-compliance with the objectives of the RU1 Primary Production zone, in proposing a non rural land use on prime agricultural land.



Heritage Item

The subject land includes a Heritage Item under the LEP – "Woodside (formerly Woodside Inn).

The following extracts are taken from the Heritage Inventory Sheet from NSW State Heritage Inventory.

Lat: S 33 ° 25.583 Long: E 149 ° 42.068

Statement of Significance

A cottage that was constructed in 1850-60 and was the Woodside Inn. The verandah was added circa 1930. Rear adjoining building and beehive style ground tank demonstrate its interesting past.

The area was connected with significant gold mining in its construction period.

Physical Description

Hughes Trueman Ludlow note a substantial Inn with hipped roof and hipped verandah. Walls have been plastered and balustrade added to verandah. Original shutters and twelve pane windows remain.

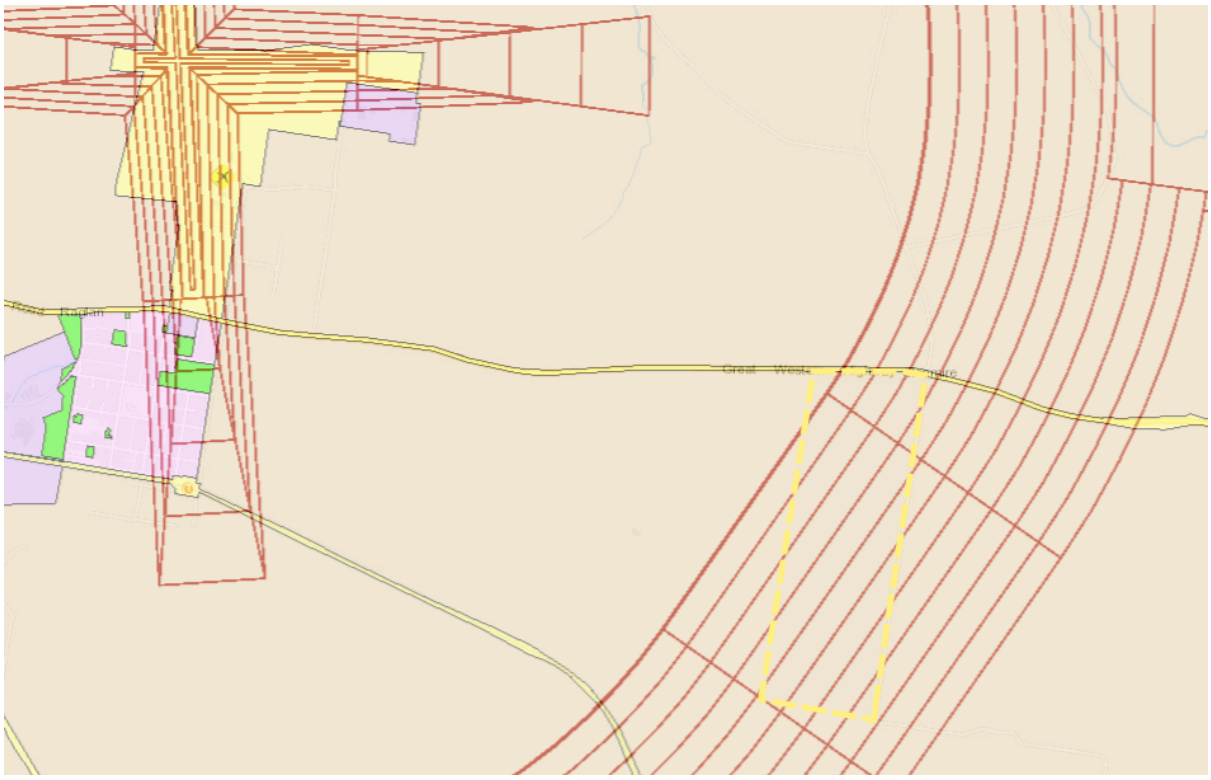
Once a substantial Inn with hipped roof and hipped verandah. While verandah has been altered twelve pane windows remain. Rear adjoining building and beehive style ground tank demonstrate its interesting past.



Substantial justification would be required to demonstrate how a solar farm would be compatible with a heritage building that is approximately 170 years old.

Obstacle Limitation Surface

The subject land is mapped as been within the Obstacle Limitation Surface (OLS) of the Bathurst Airport under the LEP (see extract below).



The positioning of a solar farm within this area could potentially lead to a glint and glare hazard for aircraft. Consultation should be initiated with the relevant Commonwealth body do determine the suitability of the subject land in this regard. Regardless a glint and glare study should be undertaken to ensure that there is no negative impact on surrounding houses and just as importantly Highway motorists.

Intersection Great Western Highway and Brewongle Lane

Large trucks such as B-Doubles will be accessing the site for many months during the construction of the solar farm. The Great Western Highway and Brewongle Road would come under the jurisdiction of Transport for NSW where traffic safety is of their highest concern. Accessing at this location could be problematic would require significant assessment to determine its suitability.

Watercourses

The subject land has a number of watercourses and farm dams. The land drains via Salt Water Creek to the Fish River and then into the Macquarie River. Accordingly, the potential for contamination and erosion needs to be thoroughly investigated.

The proposed solar farm on the southern side of the Great Western Highway on the proponent's property is sited entirely on prime agricultural land and in complete view of a large number of neighbouring properties. It is considered that the proposal is incompatible with the RU1 Primary Production provisions and objectives. This coupled with the potential heritage, air and road safety and water pollution concerns, the site identified for the future solar farm is far from ideal and the proponents should consider other more suitable locations.

Should you have any questions with respect to this matter, please contact the office on 63624523.

Yours faithfully
Anthony Daintith Town Planning Pty Ltd



Anthony Daintith
Principal

Document 11: D. Harbison Agronomist Report 16.11.2020

Agronomic Inspection Report

Glanmire Action Group

C/- Jo Petch
264 Brewongle Lane
Glanmire, NSW 2795

Private and Confidential

D R Agriculture Pty Limited
As trustee for the D R H Agricultural Trust ABN: 51 068 260 644

2470 Mitchell Highway
Molong NSW 2866
Ph: 0408 820 467 / 02 6366 9118

Jo Petch
Secretary/Coordinator
Glanmire Action Group
264 Brewongle Lane,
Glanmire 2795

November 16th, 2020

Agronomic Inspection Report

Dear Jo,

The following report provides an agronomic summary of my observations and discussions of the areas inspected, and in places tested, at "Longfield", part of "Sornlee", "Old Blarney" and "Posam Park" on November 12th 2020. Inspections were conducted on a representative area of these properties, with the knowledge that the areas between such inspection sites will vary little from those inspected and tested.

The soil samples taken at the time of the inspection, and their observed test results, identify the soil types present and some preliminary properties. Further, crop and pasture observations were made and are reported

Should you wish for further clarification of any of the material presented, please do not hesitate to contact me.

Yours sincerely,

David Harbison
Director.

Agronomic Inspection Report – Visit November 12th, 2020

I, David Harbison, of D R Agriculture Pty Ltd, 2470 Mitchell Highway, Molong, being an independent agronomist / agricultural advisor say;

1. My academic qualifications are a Bachelor Degree of Rural Science, along with various industry "Statement of Attainments" including Fertcare Advisor, Cert IV in Training and Assessment, Cert IV in Agriculture.

2. My practical experience covers 30 years as an agricultural advisor, in both the commercial and independent sector. I specialize in providing services to a range of agricultural sectors and private clients, including plant nutrition and soil science, crop and pasture production, crop and pasture research, agronomic 'due diligence' and property productivity capacity assessments, industry training, and livestock production systems.

   I have managed contracts with Meat & Livestock Australia (MLA) in pasture species research, Adelaide Research & Innovation (University of Adelaide) in crop nutrition, and currently conduct species trials for the pasture seed industry. I have done a significant amount of pasture fertility research and pasture species performance and persistence work.

Introduction

3. I am aware of a proposal by a company Elgin Energy Pty Ltd to seek permission from the State Planning Authority to install solar panels on a 160 ha area of land within a 186 ha block of land located at Glanmire.

4. The address of the rural block is 4823 Great Western Highway, Glanmire. The property is identifiable in Figure 1, as a map of reference.

5. Improvements on the property include;

   a) An old, perhaps historic, home fronting onto the highway together with some surrounding rural sheds etc

   b) Fences

6. The land is generally cleared and is slightly undulating country. It is located at the foothills of the Great Dividing Range and would, before European settlement, have highly likely to have been treed.

7. I have obtained;

   a) Aerial photography of the whole of the property and its surrounds, and

   b) A topographical map of the whole of the property and its surrounds, and attached a copy of each (Figures 1 and 2)

Observation

8. I am familiar with the site. I have visited properties within the area including "Old Blarney" and "The Oaks" that adjoin the site on the western side, "Posam Park" on the southern side, and "Longfield" and part of "Sornlee" that are located on the opposite side of Brewongle Lane on the eastern side of the site. I have seen soil test results taken from "Posam Park", "Longfield", "The Oaks" and "Old Blarney", as well as taken my own samples from such properties.

9. I have marked on the aerial photograph (figure 1) and the topographical map (figure 2) the area of the subject block.

10. I am aware of the relevance of the Bathurst Regional Environmental Plan 2014 and am aware the subject land is zoned RU1. Rural blocks of not less than 100 ha (approx. 250 acres) are allowed. I see however there are smaller blocks in the area and am informed they were created before the plan was introduced.

11. I am also aware the Dept. of Agriculture has produced a map that deals with RU1 land and categorises it. By NSW Land Classification, cultivation land is in the top categories (Land Class I – III), with grazing land considered below the top categories (Class IV and V). There are in fact many categories, with the Land Class system extending to Class VIII. This land is identified by the Dept. of Agriculture as 'cultivation' land and as such is in the second top category (only cultivation land that can be irrigated is above it). It is sought after for cultivation. It is sought after by farmers.

12. Land productivity is determined by the combination and interaction of the natural elements including:

    a) The quality and health of the soil

    b) The temperate range throughout the various distinct seasons (figure 3), and

    c) Rainfall (figure 4).

13. Land productivity is further determined by a farmer's input (management, time, crop, pasture, fertilizer, chemical etc). Generally speaking in the Bathurst area, and indeed of the land in the Glanmire district, soils need to be healthy, with input from whatever source that may be chosen (organic, biological, chemical etc) to achieve their productivity potential.

14. From my observations, the soils in this block may be described as free draining loamy sands/sandy loams in the surface, with a heavier textured loam to sandy clay material deeper in the profile (figure 5a and 5b). The "Bathurst Granite" geology of the Bathurst Basin has generally resulted in light textured sandy soils over much of the local district similar to this site.

15. At this location, the natural elements referred to in para 12 above combine and interact to render this land with good productive potential. It is sought after by farmers/rural producers.

Opinion

16. In expressing my opinion of the land use I am assuming it is in the management of a reasonably competent farmer.

17. In my opinion, this land can be appropriately used for broadacre dryland cropping (figure 6), be it oats, canola, wheat, barley etc, as well as for pasture. According to NSW DPI national variety trials (NVT's), wheat yields in the district of up to 5.39 t/ha have been achieved (source NVT Online). Such trial data is not directly available for canola or oats, however it is generally accepted that canola yields about half that of wheat. As such, canola yields of up to 2.7 t/ha may be achieved, with 2.5 t/ha being achieved quite often, while oats is a lighter grain and yields less than wheat, more typically 2.5 – 4 t/ha. In the pasture phase, much of this land has historically grazed 7.5 – 10 dry sheep equivalents (dse's) per ha, with the higher performing farmers reaching annualized stocking rates even higher.

18. My opinion expressed in point 17 is supported by many crops and pastures in the district this year, and indeed in the crops and pastures of the site in question and the properties and paddocks of its neighbours.

19. There is in this country, a finite, and indeed rather limited area, where the natural elements of soil, seasons and rainfall, referred to in paras 12 and 15, combine and interact, to produce the rural products referred to in para 17, in particular, grain. This land is a most valuable commodity to agriculture.

20. With Climate Change a reality, and the predicted forecasts from *Climate Change in Australia*, (which was developed by CSIRO and the Bureau of Meteorology in partnership with the Department of Climate Change and Energy Efficiency) I foresee this land's commodity increasing in importance.



Figure 1 - Aerial image of the Glanmire district, with the proposed site located.(source Google Earth)

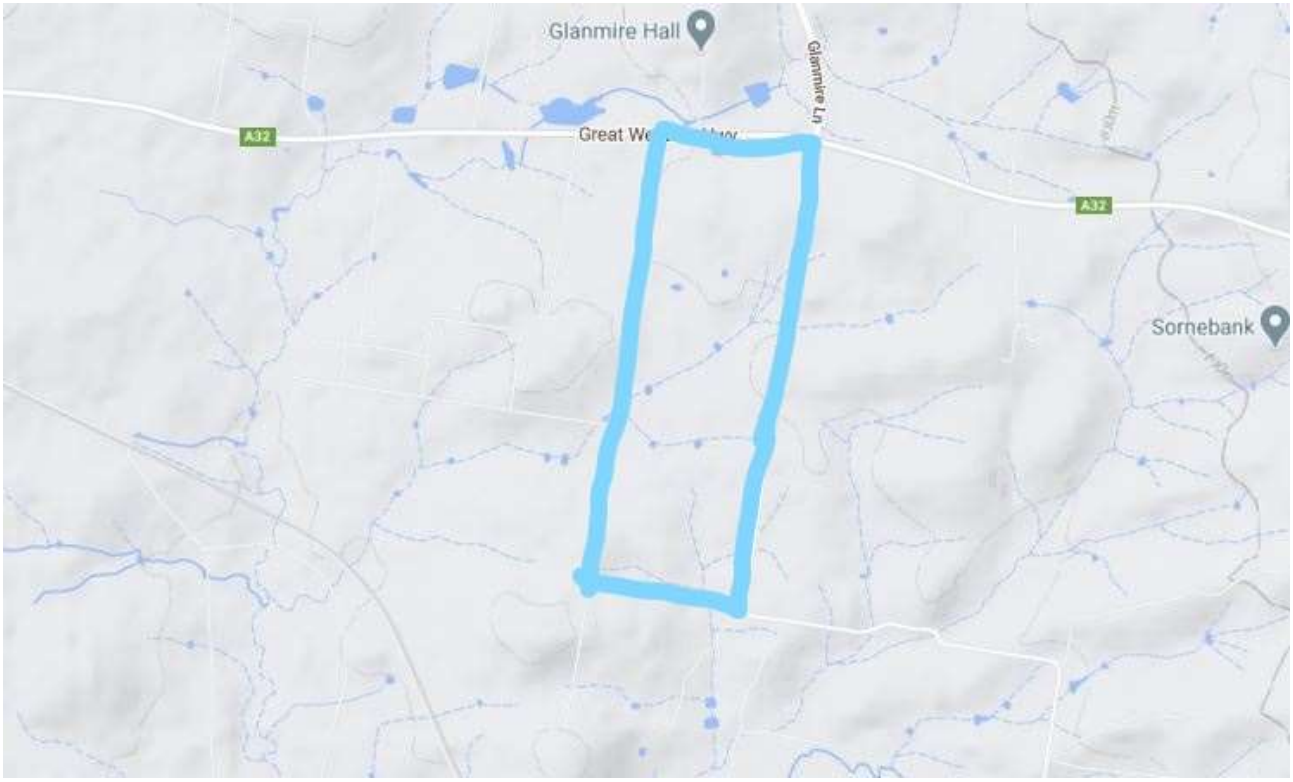


Figure 2 - Topgraphical map of the Glanmire district, with the proposed site located.(source SSSS)

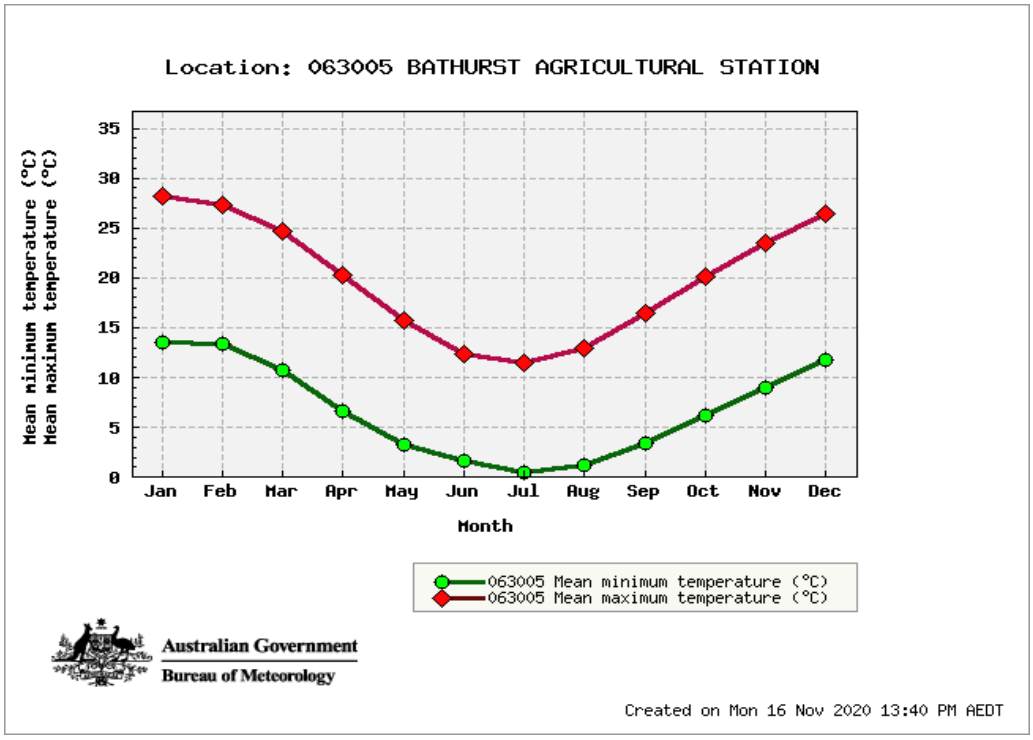


Figure 3 - Average monthly maximum and minimum temperatures for more than 100 years of data from the Bureau of Meteorology's weather station at the Bathurst Agricultural Station

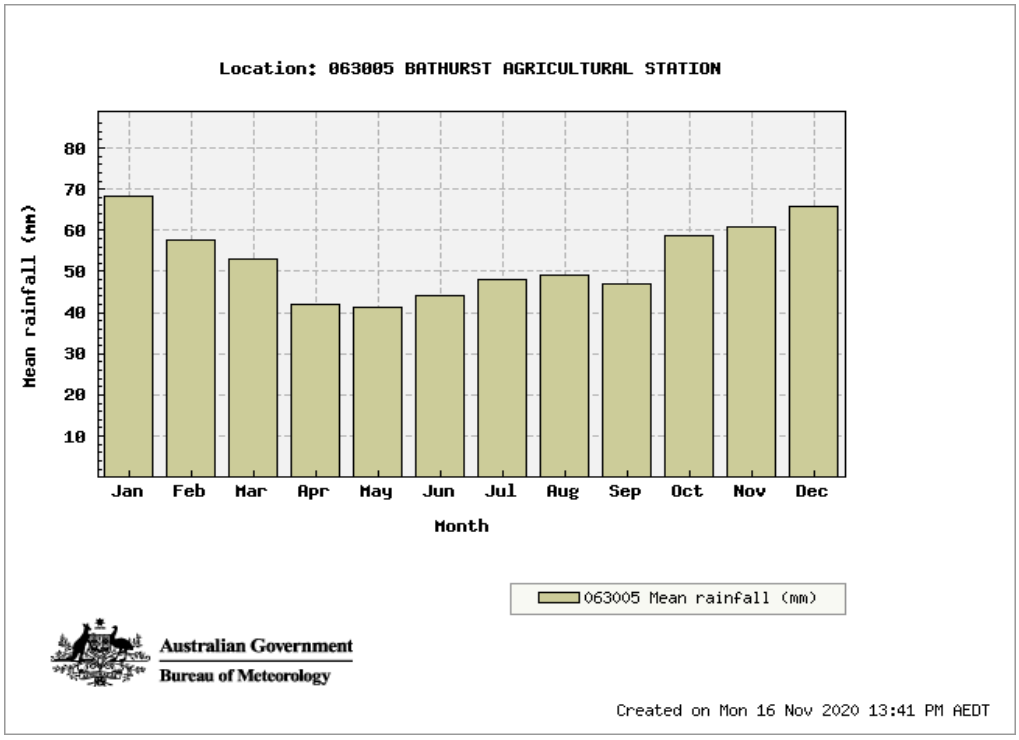


Figure 4 - Average monthly rainfall for more than 100 years of data from the Bureau of Meteorology's weather station at the Bathurst Agricultural Station



Figure 5 - Soil samples and pH identification on the eastern (a) and western (b) side of the proposed site



Figure 6 - Current crop prospects on the site, canola and oat crops, with a spray fallowed paddock (likely for 2021crop) in the background of the oats

Disclaimer
The information contained in this report, while believed to be true and accurate at the time of publication, is subject to change pending future management. You should always seek updated professional agronomic advice before taking any action, particularly when weather conditions and rainfall have such a determining outcome. Liability for any errors or omissions is excluded by D R Agriculture Pty Limited, its directors and employees.

Document 12: Tremain & Ivey Advising Report 19.1.2021

Tremain Ivey Advisory
Agricultural Consultants

Agricultural Impacts of Proposed Glanmire Solar Farm

Draft Agricultural Consulting Report to:

Glanmire Action Group

Prepared for: Jo Petch and Peter Hennessy on behalf of Glanmire Action Group

19 January 2021

Prepared by: **Tremain Ivey Advisory**
Author: **Richard Ivey and Andrew Rice**

Wellington Office
26 Swift St
(PO Box 445)
WELLINGTON NSW 2820

Contact
Tel 02 6845 4545
Email TIA@TIAdvisory.com.au
Web www.TIAdvisory.com.au

Sydney Office
Level 14, 52 Phillip St
(GPO Box 3486)
SYDNEY NSW 2000

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ABN 99 559 318 656

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1 Executive Summary

1.1 Introduction

This report presents an investigation of the agricultural and economic impacts of the proposed solar farm on land at 4823 Great Western Highway, Glanmire, NSW 2795 ("the Property"). Proponents of the project are Elgin Energy. The report was written under instructions from Jo Petch and Peter Hennessy, acting on behalf of the Glanmire Action Group.

This report details the outputs of an investigation of the agricultural productivity of the proposed site of the solar project.

1.2 Agricultural Capacity of Solar Project area

Elgin Energy (2020) advises that:

- the Property that comprises the Solar Project has a total area of **186 ha**; and
- the development footprint for the Solar Project is **140 ha**.

Further, Elgin Energy (2020) advise that the aim is to return the development footprint area to grazing with sheep once the Solar Project is operational.

TIA analysis using GIS mapping shows:

- The area available for agricultural production on the Property is approximately **185 ha** (the 'Productive Area').
- The arable area is approximately **179.5 ha**. This is the area able to support cultivation to establish crops and pastures.

1.3 Assessed Agricultural Production Potential

TIA agree with the assessment of agricultural potential of the Solar Project area provided in a report prepared by Mr David Harbison and dated 16 November 2020. The Solar Project area is capable of supporting an intensive mixed crop and livestock farming system. Such a farming system is typical of that utilised by farm businesses on the lands of similar agricultural potential surrounding the Solar Project area and generally in the Bathurst region.

1.4 Agricultural Financial Returns

The financial returns from agricultural production on the Solar Project area is based on a mixed crop and livestock farming system and the assessed agricultural potential provided by Mr Harbison. The key assumptions within the analysis are designed to provide financial returns indicative of an average year with respect to climate and market conditions.

An overview of the key results from the budget is shown over.

Overview - Whole Farm Budget - Average Year

Budget Overview	
Income	$228,714
Operating Expenses	126,664
Operating Return	102,050
Non Operating Costs	12,750
Total Cash Outgo	126,664
Net Cash Surplus/Deficit	$102,050

1.5 Alternative Sites

The report presents financial returns from alternative sites, in areas with lower agricultural production potential.

Comparable financial returns have been prepared for the NSW Far West based on the median stocking rate calculated from ABARES (2021) data.

The TIA analysis has included allowance for general expenses that are directly linked to the operation of 186 ha in the Far-West area of NSW.

An overview of the key results from the budget is shown below.

Overview - Whole Farm Budget – NSW Far West

Budget Overview	
Income	$4,512
Operating Expenses	1,868
Operating Return	2,644
Non Operating Costs	250
Total Cash Outgo	1,868
Net Cash Surplus/Deficit	$2,644

1.6 Comparison of Financial Returns

Comparing the results of the analyses, the annual gross income for Solar Project area is $228,714 compared to $4,512 for NSW Far West.

The gross income for 186 ha in NSW Far West is less than 2.0% of the Solar Project area.

2 Introduction

2.1 Background

This report presents an investigation of the agricultural and economic impacts of the proposed solar farm on land at 4823 Great Western Highway, Glanmire, NSW 2795 ("the Solar Project"). Proponents of the project are Elgin Energy. The report was written under instructions from Jo Petch and Peter Hennessy, acting on behalf of the Glanmire Action Group.

The Glanmire Action Group comprises a group of eight landowners of neighbouring properties. The group is not a formal entity (ie. not a registered incorporated association).

This report details the outputs of an investigation of the agricultural productivity of the proposed site of the solar project, 4823 Great Western Highway, GLANMIRE NSW 2795 ("the Property").

This report has been prepared in accordance the Ag Institute Australia code of ethics.

All enquiries which are desirable and appropriate have been made. No relevant matters of significance which the author regards as relevant have, to the knowledge of the author, been withheld.

This report has been prepared by Richard Ivey with the assistance of Tremain Ivey Advisory (TIA) associate Andrew Rice.

2.2 Instructions Accepted

The initial brief for the TIA investigations was detailed in a letter from the Glanmire Action Group (dated 19 November 2020).

The instructions accepted where detailed in a TIA engagement agreement (dated 23 November 2020). The engagement agreement specified the following tasks to be undertaken under the engagement:

1. Obtain and review all relevant background documents including land classification and utilisation options [for the Property].
2. Undertake discussions with the lessee [of the Property].
3. Determine an appropriate average year management program [for the Property].
4. Prepare detailed budgets quantifying gross and net financial returns expected from the average year program.
5. Research relative impact of establishing the Solar project on the Property compared to other sites with lower [agricultural] productivity.
6. Prepare and present draft [written] report detailing the above issues.
7. Receive and review feedback from members of the Glanmire Action Group in relation to the above draft report.
8. Incorporate any further issues as appropriate into a final report.

9. Prepare and present a final report as detailed above.

2.3 Documents Provided

The following documents were provided by Glanmire Action Group for the preparation of this report:

1. Letter to TIA (dated 19 November 2020) detailing initial brief and background information.
2. Document titled 'Synopsis (Full)' (undated); provides background information on the proposed Solar Project, Glanmire Action Group and the proposed Project site.
3. Proposed Solar Farm at Glamire, NSW: FAQ (1 November 2020), Elgin Energy Pty Ltd.
4. Agronomic Inspection Report (dated 16 November 2020), DR Agriculture Pty Ltd (author: Mr David Harbison, Director).

2.4 Goods and Services Tax

It is assumed that operators of the Property have an Australian Business Number (ABN) and are registered for Goods and Services Tax (GST). On this basis operators will receive a tax credit for GST paid on goods and services in operation of the Property.

Therefore, income and expenses presented in this report on a GST exclusive basis, unless otherwise stated.

2.5 Acronyms and Abbreviations

arable area	Area able to support cultivation to establish crops and pastures.
ASC	Australian Soils Classification
Average year	Average year with respect to climate and market conditions.
BOM	Bureau of Meteorology
BSAL	Biophysical Strategic Agricultural Land
DPIE	(NSW) Department of Planning, Industry and Environment
DSE	Dry Sheep Equivalents
GIS	Geographic Information System
ha	Hectare(s)
ISF	Inherent Soil Fertility
LGA	Local Government Area

Mixed farming	Mixed crop and livestock production.
NDVI	Normalised Difference Vegetation Index
(NSW) OEH	former (NSW) Office of Environment & Heritage
Productive Area	Area of the Property that is available for agricultural production.
(the) Property	823 Great Western Highway, GLANMIRE NSW 2795
Km	Kilometre
M	Metre
SL	Soil Landscape
TIA	Tremain Ivey Advisory
(the) Solar Project	Glanmire Solar Farm project

3 Proposed Glanmire Solar Farm Project

3.1 Background

The Solar Project proponent is understood to be Elgin Energy Pty Ltd.

With offices in London (United Kingdom), Dublin (Ireland), Sydney (NSW) and Melbourne (VIC)[1], Elgin Energy was founded in 2009. Reportedly, Elgin Energy has plans for solar farm developments in United Kingdom, Ireland and Australia. While plans are held for solar farm projects in Australia, there are no other current projects known to exist in Australia based on information available on Elgin Energy website.[2]

3.2 Project Site Location

The site of the Glanmire Solar Farm project ("the Solar Project") is 4823 Great Western Highway, GLANMIRE NSW 2795 ("the Property") (Elgin Energy 2020).

The Property is understood to comprise Lot 141 DP1144786 (Bathurst Regional LGA). This is based on site address details and location mapping (Elgin Energy 2020) and use of SIX Maps (NSW Spatial Services 2021a) to obtain full lot details.

The Property is some 11 km east of the major regional centre of Bathurst (NSW).

Project site and location in relation to Bathurst is shown in Figure 1. Figure 1 has been prepared by TIA and shows the following spatial information from NSW Spatial Services (2021b):

- a base map comprising the latest available satellite imagery (15 August 2013; 50 cm resolution); and
- overlays;
    - Lot (boundary and numbers);
    - Project boundary (based on lot boundaries); and
    - 1 m contours.

NSW Spatial Services imagery has been used in Figure 1 as it provides evidence of historical land use for the Property (discussed further Section 3.3).

3.3 Current Site Ownership and Operation

The Property that comprises the proposed Solar Farm site is owned by Mr Michael Danziger. The farm operations on the Property are understood to be conducted under a share farming agreement. The share farmer is Mr Brett Bailey. Mr Bailey leases land in other areas within NSW.

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[1] https://www.elgin-energy.com/contact-us/

[2] https://www.elgin-energy.com/

While the property has supported mixed crop and livestock operations in the past, the Glanmire Action Group advise that it is currently operated as farm business focused on grazing (sheep for meat and wool). Mr Harbison (personal communication 6 January 2021) confirmed that at the time of his inspection (12 November 2020) there was wheat, oats and canola crops growing on the Property.

Figure 1 (base image) shows evidence of past cultivation for crop and pasture. Within the 2013 base image in Figure 1, winter crops can be seen within the 5 paddocks that comprise the Southern portion of the Property.

The residence on the Property is understood to be under a residential rental lease, separate to the share farming agreement.

3.4 Project Site and Development Footprint Areas

Elgin Energy (2020) advise that the Property that forms the Solar Project site is **186 ha**.

As per Section 3.2, the Solar Project Site comprises Lot 141 DP1144786 (Bathurst Regional LGA). Verification by TIA using Geographic Information Systems (GIS) mapping shows that this lot has an area of 185.8 ha. This is consistent with the Site area reported by Elgin Energy (2020). An area of 186 ha will be assumed for the Property in the TIA analysis presented in this report.

The development footprint is understood to be **140 ha** (Elgin Energy 2020). Details of the development footprint location where not available for the preparation of this report.

3.5 Project description

The Solar Project is described by Elgin Energy (2020) as follows:

> *Glanmire Solar Farm is proposed to have a capacity of approximately 60 megawatts (MW)(ac) comprising ground mounted solar photovoltaic (PV) modules (panels) similar to those installed on rooftops around Australia.*
>
> *The project is aiming to continue sheep grazing within the development footprint of the project once operational.*

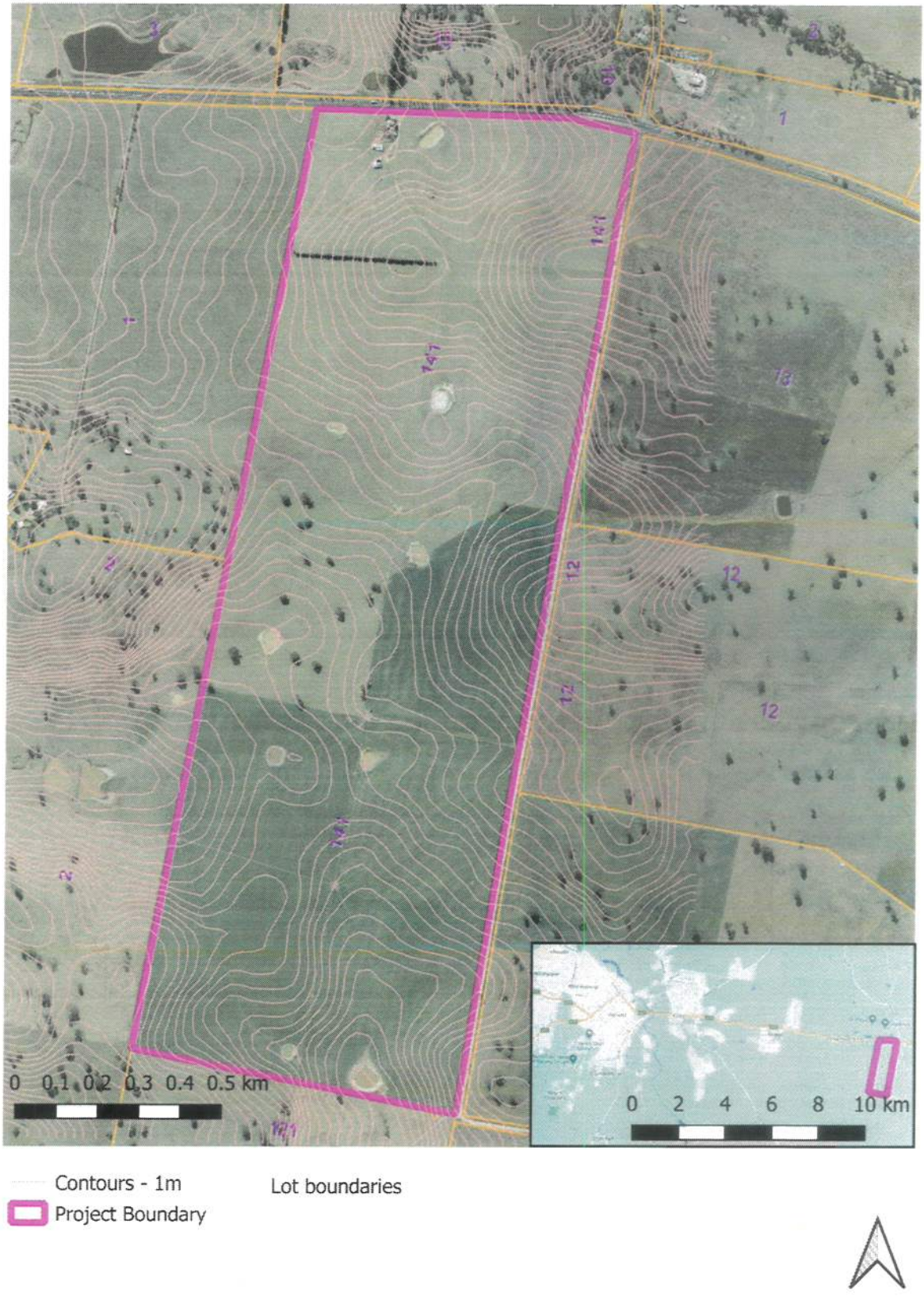
3.6 Reasons for selecting proposed Solar Farm Site

Elgin Energy (2020) advise that the reasons for selecting the proposed Site include:

- *High solar irradiance;*
- *Cost-effective grid connection with capacity;*
- *Relatively flat and clear land with few environmental constraints; and*
- *Not identified as highest quality land or 'Biophysical Strategic Agricultural Land'.*

TIA understand that the reference to Biophysical Strategic Agricultural Land refers to the NSW Department of Planning, Industry and Environment system of classification and mapping of agricultural land (DPIE 2021).

Figure 1: Solar Project site map



4 Agricultural Capacity of Solar Project area

The agricultural capacity of the Solar Project area is defined by the area available for production, property improvements, biophysical resources, climate and the regional infrastructure and support services. These aspects are discussed in the follow in sub-sections.

The assessment of agricultural productive capacity is assessed based on a combination of these resources.

4.1 Areas

As detailed in Section 3.4, Elgin Energy (2020) advises that:

- the Property that comprises the Solar Project has a total area of **186 ha**; and
- the development footprint for the Solar Project is **140 ha**.

Further, Elgin Energy (2020) advise that the aim is to return the development footprint area to grazing with sheep once the Solar Project is operational.

TIA analysis using GIS mapping shows:

- The area available for agricultural production on the Property is approximately **185 ha** (the 'Productive Area'). There is approximately 1.2 ha associated with the area surrounding the dwelling and farm sheds on the property. While the area would be utilised for limited grazing with livestock, it has been deducted from the Productive Area.
- The arable area is approximately **179.5 ha**. This is the area able to support cultivation to establish crops and pastures. Areas on the Property assessed as non-arable includes area surrounding the dwelling and sheds, dams, waterways, watercourses and tree lots. These non-arable areas can be seen in Figure 1.

Mr Harbison (personal communication 6 January 2021) confirmed that at the time of his inspection (12 November 2020) there was wheat, oats and canola crops growing on the Property.

Figure 2 shows Normalised Difference Vegetation Index (NDVI) imagery for the Property captured by satellite on 15 November 2020. NDVI imagery is an indicator of crop and pasture health and growth [1]. Maximum NDVI values are normally around 0.85. The scale at the bottom of Figure 2 shows that the darker blue areas on the Solar Project area are around 0.7. This suggests that these areas were under winter crop at the time of the image. Areas of orange (NDVI 0.17) are likely to be heavily grazed areas or crops that were approaching or at maturity. For example, canola ready for windrowing is generally around 0.40 NDVI.

[1] https://www.decipher.com.au/blog/agriculture/what-is-ndvi-imagery-and-how-can-i-use-it-this-season/

For comparison NDVI imagery from earlier in the year (23 July 2020 is shown). A dark blue area (NDVI 0.84) in the north-western portion of the property is expected to represent a winter crop paddock.

Figure 2: NDVI imagery (10 November 2020) for the Solar Project area

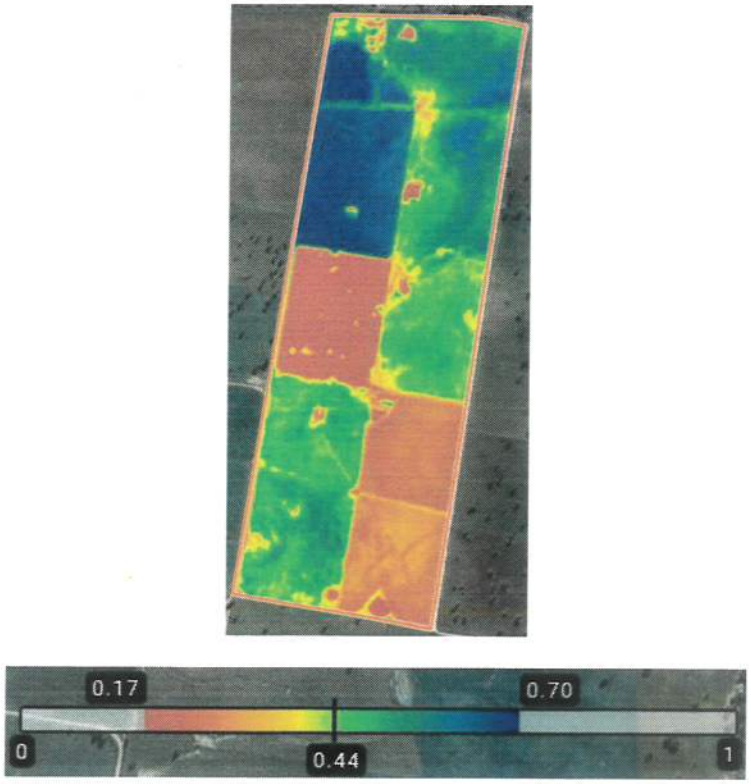
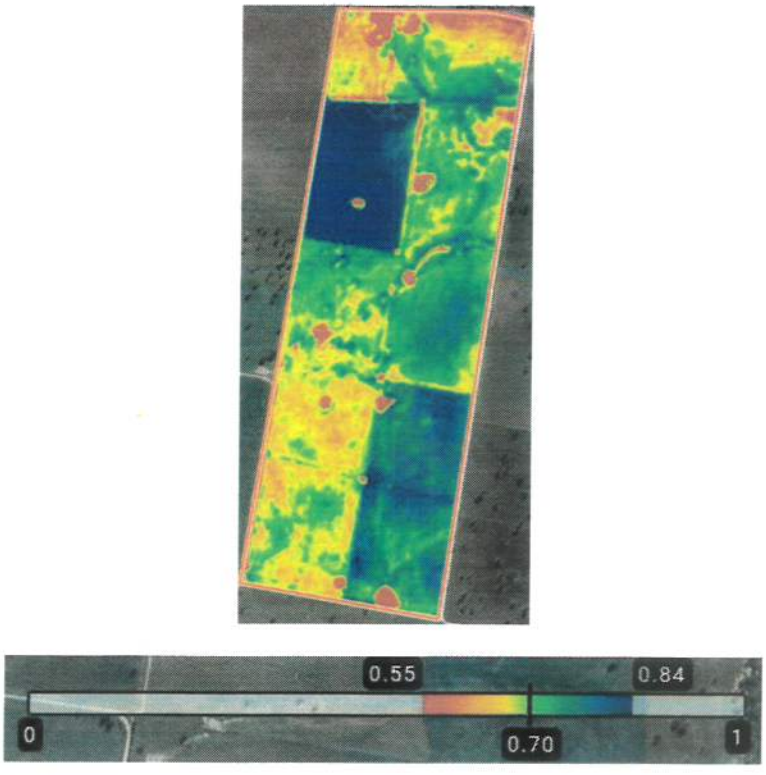


Figure 3: NDVI imagery (23 July 2020) for the Solar Project area



4.2 Property Improvements

Based on his inspection of the property, Mr Harbison describes the structural improvements on the Property in his report (dated 16 November 2020) as:

- Dwelling and associated farm sheds; and
- Livestock fencing.

TIA understands that fencing is suitable for containment of both sheep and cattle. Based on satellite imagery (Figure 1), TIA notes that the property has subdivision fencing to form eleven major paddocks for grazing.

Based on satellite imagery (Figure 1), TIA notes that there are nine earthen dams on the property. These dams capture surface water runoff from the property and water from first and second order streams flowing across the Property.

It is not known if there are any other sources of water for livestock on the Property in addition to the dams. TIA consider that the dams noted in Figure 1 would be sufficient to meet the water requirements for livestock grazing on the property on a year-round basis with surface water runoff in most years.

4.3 Biophysical Resources

Soils are the key property biophysical resource determining the agricultural productivity of the Solar Project area. Mr Harbison provides a detailed account of his assessment of the soils on the Solar Project area and surrounding farms in his report (dated 16 November 2020).

In his report (dated 16 November 2020), Mr Harbison described the soils as follows:

> *The soils in this block may be described as free draining loamy sands/sandy loams in the surface, with a heavier textured loam to sandy clay material deeper in the profile. The "Bathurst Granite" geology of the Bathurst Basin has generally resulted in light textured sandy soils over much of the local district similar to this site.*

Soils mapping covering the site (NSW Spatial Services 2021b and) with TIA analysis using GSI mapping shows the following with respect to soils on the Solar Project area:

- **Australian Soils Classification (ASC):** The majority of the Solar Project area has soils from the ASC group - Sodosols (131.4 ha; 71% of area). The balance of the area has soils from ASC group – Chromosols (54.6 ha; 29% of area).
- **Inherent Soil Fertility (ISF):** The majority of the Solar Project area has soils from the ISF class - moderate (131.4 ha; 71% of area). The balance of the area has soils from ISF class – moderately low (54.6 ha; 29% of area). The ISF classes match the ASC groups mapped on the Solar Project area, whereby Sodosols are mapped as ISF class – moderate and Chromosols are mapped as ISF class – moderately low.
- **Soil Landscape (SL):** Like the ISF, SL mapping matches the ASC mapping. There are two SL present on the Solar Project area. The majority of the Solar

Project area is Bathurst SL (131.4 ha; 71% of area). The balance of the area is Raglan SL (54.6 ha; 29% of area).

The SL mapping provides a useful description of the landscape and soil sequences for the Solar Project site. Descriptions from SL mapping (DPIE 2020a):

Bathurst SL: The Bathurst soil landscape is located on hills around Bathurst and has non-calcic brown soils with yellow solodic soils on the lower slopes and in drainage lines. Sands (Uc1) and mottled yellow solodic soils also occur.

This landscape has undulating to rolling hills, with elevations of 650–850 m and most slopes from 6–10%. Slope lengths vary from 400–800 m, but can range up to 2000 m. Drainage depressions slopes are from 4–7%, but range from 1–9%. Local relief is from 30–70 m. Erosional channels drain north into the major streams. Drainage pattern is convergent, with drainage lines from 500–1000 m apart.

A savannah woodland with a yellow box community is dominant vegetation type.

Raglan SL: This landscape comprises the gently undulating to undulating rises on the Bathurst Plains. Red solodic soils are the dominant soils with yellow solodic soils commonly found on lower slopes and in drainage depressions. Some non-calcic brown soils are associated with Bathurst soil landscape on upper slopes. Red massive earths and yellow earths are also present.

This landscape comprises of gently undulating to undulating rises, 680–780 m above sea level. Average slope angles range from 2–5%, with small pockets between 6–10%. Slope lengths are from 100–300 m, with some up to 2000 m. Drainage depressions have slopes of 1–2%. Local relief is from 20–30 m, with some up to 40 m. Drainage lines are fixed and are widely spaced at 400–500 m apart.

Savannah grassland is the dominant vegetation community, with river she-oaks along main drainage channels.

4.4 Climate

The nearest Bureau of Meteorology (BOM) recording station is Bathurst Airport (Station 063291) some 4.5 kilometres to the north-west of the Solar Project area. However, this station only opened in 1988 and the key data from this station relevant to this report (rainfall and temperature) is only from 1994 onwards. Therefore, Bathurst Agricultural Station (Station 063005), some 11.5 km west of the Solar Project area has been used in this report. The Bathurst Agricultural Station was opened in 1908, with temperature records from 1909 and rainfall from 1908.

TIA considers that the Bathurst Agricultural Station (the 'Bathurst BOM station') will provide an apprpriate indication of the climate for the Solar Project are, suitable for the purposes of this report.

The mean rainfall (**Error! Reference source not found.**) is 635.2 millimetres for Bathurst Agricultural Station (elevation 713 m). As with other parts of Central

Tablelands region, rainfall is strongly influenced by altitude. The Solar Project area has elevation that generally ranges from 720 to 740 m. Therefore, the Bathurst Agricultural Station rainfall is expected to be similar to the Solar Project area.

The rainfall at the Bathurst BOM station is relatively reliable with moderately variability[1] of 64%. Records indicate that one in 10 years records an annual rainfall of less than approximately 69% of the long-term average. One in 10 years also records rainfall of more than 132% of the long-term average. Variability in rainfall is greater in in summer and early autumn (December to March) than at other times of the year.

A summary of temperature records for Bathurst BOM station is set out in **Error! Reference source not found.**. The mean maximum monthly temperature reaches a high of 28.2°C in January and a low of 11.4°C in July.

There has been an average of 5.7 days per annum over 35°C. The mean minimum monthly temperature falls to a low of 0.5°C in July but is around 13.5°C in January and February.

Temperatures in the Solar Project area will largely be similar to the Bathurst BOM station, based on elevation.

There has been an average of 94.4 days per annum with a minimum temperature under 2°C, which is generally regarded as the approximate temperature at which a frost will occur. Nights with a minimum temperature of less than 2°C can be generally expected in between June and August in a typical year.

[1] Defined as the 90th rainfall percentile minus the 10th rainfall percentile divided by the median.

Table 1: Summary of rainfall records – Bathurst Agricultural Station

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Annual
Bathurst (Bathurst Agricultural Station)													
Station Number: 063005 · Opened: 1908 · Latitude: 33.43°S · Longitude: 149.56°E · Elevation: 713 m													
Mean	68.3	57.8	52.9	42.0	41.3	44.0	48.1	49.2	47.1	58.8	60.7	65.7	635.2
Median	58.2	47.8	41.7	37.2	33.7	36.8	41.7	44.6	43.6	53.9	55.4	59.0	626.9
10th percentile	13.2	5.6	6.3	6.8	8.4	15.8	14.4	15.4	15.8	17.3	17.7	12.1	436.8
90th percentile	116.4	127.8	120.5	84.3	80.7	89.3	92.1	89.3	80.6	105.4	111.5	135.1	840.4

Table 2: Summary of temperature records – Bathurst Agricultural Station

Statistic Element	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Annual
Bathurst (Bathurst Agricultural Station)													
Station Number: 063005 · Opened: 1908 · Latitude: 33.43°S · Longitude: 149.56°E · Elevation: 713 m													
Mean maximum temperature (°C)	**28.2**	**27.3**	**24.6**	**20.2**	**15.7**	**12.3**	**11.4**	**13.0**	**16.5**	**20.1**	**23.5**	**26.5**	**19.9**
Decile 1 maximum temperature (°C)	22.0	22.0	19.7	15.9	11.8	8.7	7.8	9.0	11.2	14.4	17.0	20.6	
Decile 9 maximum temperature (°C)	34.2	33.0	29.5	25.0	20.2	15.8	15.0	17.7	22.0	26.0	30.0	32.4	
Mean number of days >= 35°C	2.8	1.4	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.4	1.0	5.7
Mean minimum temperature (°C)	**13.5**	**13.4**	**10.8**	**6.7**	**3.3**	**1.6**	**0.5**	**1.2**	**3.4**	**6.2**	**9.0**	**11.7**	**6.8**
Decile 1 minimum temperature (°C)	9.0	9.0	5.6	1.3	-2.0	-3.5	-4.4	-3.2	-1.3	1.0	3.9	6.2	
Decile 9 minimum temperature (°C)	17.5	17.0	15.0	11.8	9.0	6.6	5.0	5.6	8.1	11.0	13.8	15.6	
Mean number of days <= 2°C	0.0	0.0	0.3	4.3	13.6	16.9	20.6	19.1	13.0	5.5	1.0	0.1	94.4

4.5 Land Zoning

The entire Solar Project area are zoned RU1 Primary Production under the Bathurst Regional Local Environmental Plan (LEP) 2014 (Bathurst LEP 2014).

The objects of the RU1 zone within Bathurst LEP are to:

- encourage sustainable primary industry production by maintaining and enhancing the natural resource base;
- encourage diversity in primary industry enterprises and systems appropriate for the area;
- minimise the fragmentation and alienation of resource lands;
- minimise conflict between land uses within this zone and land uses within adjoining zones;
- maintain the rural and scenic character of the land; and
- provide for a range of compatible land uses that are in keeping with the rural character of the locality, do not unnecessarily convert rural land resources to non-agricultural land uses, minimise impacts on the environmental qualities of the land and avoid land use conflicts.

4.6 Land Classification

There are a number of measures of land capability relevant to agriculture. This report concentrates on the land and soil capability assessment scheme (OEH 2012). However, other measures are also examined in the following sections.

4.6.1 Land and Soil Capability

4.6.1.1 Background

The land and soil capability (LSC) assessment scheme was published in 2012 by the former Office of Environment & Heritage (OEH 2012), representing a revision of an earlier scheme that was first published by the former Soil Conservation Service of NSW in 1986 (Emery 1986). The LSC system builds on the earlier scheme, but with more emphasis on a broader range of soil and landscape properties.

LSC is based on an assessment of the biophysical characteristics of the land, the extent to which this will limit a particular type of land use, and the current technology that is available for the management of the land. It indicates the broad agricultural land uses most physically suited to an area. That is, it determines the best match between the physical requirements of the use and the physical qualities of the land, and the potential hazards and limitations associated with specific uses over a site. The LSC system can provide guidance on the inputs and management requirements associated with different intensities of agricultural land use (Woodward 1988).

The LSC assessment is based on the premise that using land beyond its capability may have serious consequences for the land and soil resources of the State as well as broader environmental impacts on water, air and biodiversity (Woodward 1988).

The LSC assessment scheme comprises eight Land Capability Classes (1 to 8) with values representing a decreasing capability of the land to sustain intensive agricultural land use. Class 1 represents land capable of sustaining most intensive land uses including those that are often associated with regular soil cultivation, whereas Class 8 represents land that can only sustain very low intensity land uses.

The current LSC scheme was initially developed for the NSW property vegetation planning program under the former *Native Vegetation Act* 2003 and further upgraded for the NSW Natural Resources Monitoring, Evaluation and Reporting program.

The LSC assessment scheme uses the biophysical features of the land and soil including landform position, slope gradient, drainage, climate, soil type and soil characteristics to derive detailed rating tables for a range of land and soil hazards. These hazards include water erosion, wind erosion, soil structure decline, soil acidification, salinity, waterlogging, shallow soils and mass movement. Each hazard is given a rating between 1 (best, highest capability land) and 8 (worst, lowest capability land). The final LSC class of the land is based on the most limiting hazard.

The LSC class gives an indication of the land management practices that can be applied to a parcel of land without causing degradation to the land and soil at the site and to the off-site environment. As land capability decreases, the management of hazards requires an increase in knowledge, expertise and investment. In lands with lower capability, the hazards cannot be managed effectively for some land uses.

The LSC assessment scheme is most suitable for broad-scale assessment of land capability, particularly for assessment of lower intensity, dryland agricultural land use. It is less applicable for high intensity land use, or for irrigation (Woodward 1988).

4.6.1.2 The Solar Project area

Based on existing state-wide mapping by OEH (2012), The Solar Project area consists of Class 3 and 5 land. There are areas of Class 2 land immediately outside the Project area to the south (Figure 4). The class 3 land occurs in the south-west portion of the Project area.

The LSC mapping matches the soils mapping (ASC, ISF and SL) presented in Section 4.3. The majority of the Solar Project area is Class 3 (131.4 ha; 71% of area). The balance of the area is Class 5 (54.6 ha; 29% of area).

Class 3 land is described as "*high capability land: Land has moderate limitations and is capable of sustaining high-impact land uses, such as cropping with cultivation, using more intensive, readily available and widely accepted management practices. However, careful management of limitations is required for cropping and intensive grazing to avoid land and environmental degradation.*

Class 5 land is described as "*moderate–low capability land: Land has high limitations for high-impact land uses. Will largely restrict land use to grazing, some horticulture (orchards), forestry and nature conservation. The limitations need to be carefully managed to prevent long-term degradation.*

The LSC class for land is based on the most limiting constraint. In the case of the Solar Project area, class 5 land is water erosion (5) and wind erosion (4). This is based on soil type, not landscape factors (eg. slope). Other constraint classes for these areas show only low levels with respect to other soil constraints (structure, acidification, salinity, waterlogging, shallow/rockiness and mass movement). With modern farming practices, the risk of erosion can be managed, and this would enable the class 5 areas on the Solar Project area to be utilised with similar capability to the class 3 areas.

The LSC mapping broadly concurs with observations made by Mr Harbison.

Figure 4: Soil and land capability for the Solar Project site



4.6.2 Other Measures of Land Capability

4.6.2.1 Agricultural Land Classification

The agricultural land classification (ALC) system is similar to the LSC assessment scheme. The current agricultural land classification (ALC) system (Hulme, et al 2002) was developed by the former NSW Agriculture (now DPI).

Under the ALC system land is classified by evaluating biophysical, social and economic factors that may constrain the use of land for agriculture. In general terms, the fewer the constraints on the land, the greater its value for agriculture. Each type of agricultural enterprise has a particular set of constraints affecting production.

The ALC system is not considered in detail in this assessment due to its similarity to the LSC assessment scheme, and its limitations. Squires (2017) states that the ALC system has limitations with *"poor quality control of product, limited availability and suitability for digital conversion (available as paper maps only in some areas), does not identify specific industry needs and excludes non-soil based agricultural needs".*

There is no known, existing ALC mapping covering the Solar Project site. Unlike the LSC assessments, there is not state-wide mapping coverage. ALC mapping tends to be undertaken by NSW DPI on an as needed basis for assessment of proposed developments in localised areas.

4.6.2.2 Biophysical Strategic Agricultural Land

Biophysical strategic agricultural land (BSAL) is land with high quality soil and water resources capable of sustaining high levels of productivity. The protocol for determining BSAL is set out in OEH (2013). BSAL have the best quality intrinsic landforms, soil and water resources which are naturally capable of sustaining high levels of agricultural production and require minimal management practices to maintain this high quality (DPE 2013).

In October 2013, 1.74 million hectares of BSAL were mapped in Upper Hunter and New England North West regions by the then NSW Department of Planning and Infrastructure (DPIE 2020b). In January 2014, the NSW Government finalised mapping for an additional one million hectares of BSAL across the rest of the State.

Broadly, the criteria for BSAL requires land to be moderate to high inherent fertility (Section 4.3) and LSC class 1 to 3 (Section 4.6).

There is BSAL mapped within the Bathurst Regional LGA. The closest BSAL to the Solar Project site is some 3.6 km to the north-west and only 0.8 km to the south (Figure 5).

DPIE (2020) have not mapped any BSAL in the Solar Project area.

Figure 5: BSAL in close proximity to the Solar Project site



4.6.2.3 Important Agricultural Land

The DPI is undertaking important agricultural land ("IAL") mapping across nine regions in NSW. The IAL mapping program contributes to the DPIE's regional planning actions that identify the need to map important agricultural lands in NSW. Knowing where important agricultural land is situated and understanding its requirements, value and contribution will assist state and local government, organisations and industries with making decisions about current and future agricultural land uses (DPI 2020a).

Important agricultural land ("IAL") is not precisely defined by DPI. The key document on important agricultural land "A guideline to identifying important agricultural lands in

NSW" (DPI 2017) states that IAL is defined as *"existing or future location of local or regionally important agricultural industries or resources as mapped"*.

A pilot project in the Central West and Upper Hunter of NSW defined important agricultural industry land as *"land that is highly suitable for specific agricultural industries in accordance with the typical biophysical, marketing and climatic conditions for the locality or region"*.

DPI (2017) sets out the criteria and thresholds used in the mapping of IAL during a study of the Central West and Orana regions of NSW. However, the criteria and thresholds for agricultural industries in a particular study area may vary considerably from those in a different geographic area, and some criteria may not be directly transferable from one region to another.

DPI advise that the IAL Project has recently been updated in response to feedback. The IAL project remains a key part of the Government's commitment to implementing Right to Farm Policy and is proposed to be completed in 2020. The revised project will ensure a product is developed which is suitable for inclusion in the planning framework.

The intent of the revised IAL Mapping Project is to identify areas in a region which are key contributors to that region's agricultural economy; and have the inherent capability of being productive with minimal inputs. These areas will be identified on a basis that they are suitable for consideration when consent authorities are undertaking strategic and statutory planning (DPI 2020d).

The pilot project in the Central West covered the Orange, Cabonne and Blaney LGAs[5]. Mapping for these LGA show extensive coverage of IAL for grazing and cropping, wool production and horticulture and viticulture. The area of IAL mapped within these LGAs is far greater than BSAL.

It is understood that IAL mapping has not yet been undertaken for the Bathurst Regional LGA.

4.7 Assessed Agricultural Production Potential

In his report (dated 16 November 2020), Mr Harbison stated that the agricultural productivity of land is determined by the combination and interaction of the natural elements including:

a) *The quality and health of the soil;*
b) *The temperate range throughout the various distinct seasons; and*
c) *Rainfall.*

Mr Harbison described the agricultural production potential of the Solar Project area as follows:

[5] https://www.dpi.nsw.gov.au/agriculture/lup/agriculture-industry-mapping/ag-mapping

At this location [the Solar Project area], the natural elements [listed a) to c) above] combine and interact to render this land with good productive potential. It is sought after by farmers/rural producers.

In my opinion, this land can be appropriately used for broadacre dryland cropping, be it oats, canola, wheat, barley etc, as well as for pasture. According to NSW DPI national variety trials (NVT's), wheat yields in the district of up to 5.39 t/ha have been achieved (source NVT Online). Such trial data is not directly available for canola or oats, however it is generally accepted that canola yields about half that of wheat. As such, canola yields of up to 2.7 t/ha may be achieved, with 2.5 t/ha being achieved quite often, while oats is a lighter grain and yields less than wheat, more typically 2.5 – 4 t/ha. In the pasture phase, much of this land has historically grazed 7.5 – 10 dry sheep equivalents (DSE) per ha, with the higher performing farmers reaching annualized stocking rates even higher.

TIA agree with the assessment of agricultural potential of the Solar Project area provided by Mr Harbison. The Solar Project area is capable of supporting an intensive mixed crop and livestock farming system. Such a farming system is typical of that utilised by farm businesses on the lands of similar agricultural potential surrounding the Solar Project area and generally in the Bathurst region.

While OEH (2012) land and soil capability mapping shows variation in capability across the Solar Project area (Section 4.6.1.2), TIA consider that with the application of best management practices, the effective agricultural capacity of the land is relatively uniform. The reasoning for this assessment is detailed in Section 4.6.1.2.

5 Agricultural Management Program

5.1 Background

A detailed assessment of the agricultural production potential of the Solar Project area was presented in Section 4 (see summary in Section 4.7). The TIA assessment of agricultural production potential agrees with that of Mr Harbison (his report dated 16 November 2020).

The following sub sections detail an agricultural management program based on the above assessments. The management program is indicative of an average year with respect to climate and market conditions.

5.2 Productive Area

Full details of the different areas that comprise the Solar Project area were provided in Section 4.1.

While the total area of the Solar Project area is understood to be 186 ha, the area available for agricultural production is only approximately **185 ha**. Within this area, the arable area is approximately 179.5 ha.

5.3 Farming System

Mixed crop and livestock production ('mixed farming') is a common farming system in the area surrounding the Solar Project area and the broader Bathurst Region. The historical and current land use on the Solar Project area has been mixed farming.

While mixed farming is the common agricultural land use, there is the potential for other farming systems on the Solar Project area. The most common alternative in the local area is specialist grazing with sheep only, cattle only or both sheep and cattle.

The Solar Project area has potential to support more intensive agricultural land use, such as dryland horticulture. This would require significant capital investment to establish.

TIA consider that in assessing the impacts on agricultural productivity of the proposed site of the Solar Farm project, that an assessment based on mixed farming system is most appropriate. This is consistent with both the historical and current land use on the Solar Project area.

5.4 Crop Production

While summer crop production is possible in the Bathurst area, winter crop production is the most commonly practiced. Summer crop production is generally practiced where there is a capacity to irrigate the land.

The TIA assessment of is based on winter crop production as part of a mixed farming system. Within a mixed farming system crops are grown in rotation with pasture, with crop and pasture phases of varying lengths. There is a wide variation in the length of phases in the Bathurst area. Commonly pasture phases vary between 5 to 15 years and crop phases between 3 to 5 years. The crop phase commonly consists of different winter crops grown in sequences to maximise crop rotation benefits. While not an exhaustive list, crop rotation benefits include pests, weeds, disease management and crop residue management and increased nutrient availability.

For the purpose of the TIA analysis the following is the assumed crop production system:

- Crop phase:
  - Phase Length: 3 years.
  - Crop Sequence: canola (winter type – grazing and grain), wheat (winter type – grazing and grain) and wheat or barley (spring type).
  - Crop Area (annual): 59.8 ha (33% of arable area, based on crop phase 3 years and pasture phase 6 years)
- Pasture phase:
  - Phase Length: 6 years (pasture established in year 1).
  - Pasture Types: Mixed pasture with combination of perennial grasses, lucerne and annual legumes.

The above crop production system is consistent with the assessment of agricultural production potential by Mr Harbison (Section 4.7).

5.5 Livestock Production

Glanmire Action Group advise that the Solar Project area it is currently operated as farm business focused on grazing (sheep for meat and wool).

The current returns for breeding enterprises, dual purpose Merino sheep (meat and wool) and beef cattle, are very similar, with both around $54 per DSE.

Based on the current operation of the Solar Farm area, farm infrastructure is assumed to best suit sheep. For the purpose of the TIA analysis, it assumed that sheep are the sole livestock enterprise operated on the Solar Farm area.

Consistent with the assessment of agricultural production potential by Mr Harbison, the TIA analysis is based on an annual stocking rate of 10.0 DSE per hectare plus an additional 3.0 DSE per hectare allowance for the use of grazing crops. Therefore, the total annual stocking rate used in the analysis is 13 DSE per hectare.

6 Agricultural Financial Returns

6.1 Background

The financial returns from agricultural production on the Solar Project area is based on the management program detailed in Section 5. The key assumptions within the analysis are designed to provide financial returns indicative of an average year with respect to climate and market conditions.

6.2 Key Assumptions

Following are details of key assumptions for the analysis of financial returns:

- All income and expenses are presented on a GST exclusive basis.
- The analysis is based on enterprise gross margin budgets that include allowance for contracting for key enterprise operations; crop (machinery operations – spraying, sowing and harvest) and livestock (lamb marking and shearing).
- A general allowance is included for casual labour to cover labour not associated with key enterprise operations above.
- Agricultural output prices within the analysis reflect current market values (January 2021). These are considered representative of expected on-going values.
- Input prices reflect expected values for 2021 production. These are considered representative of expected on-going values.
- Livestock enterprise gross margins are based on the latest NSW DPI gross margins (NSW DPI 2021). NSW DPI sheep budgets where last updated September 2019, hence TIA have constructed own budgets to reflect current market conditions for input and output pricing. TIA budgets utilise the physical production parameters from the NSW DPI budgets.
- Crop enterprise gross margins are based on the past NSW DPI gross margins (NSW DPI 2021). NSW DPI no longer publish winter crop budgets (last updated 2012), hence TIA have constructed own budgets to reflect current production parameters and market conditions.
- Financial returns are shown before an allowance for the value of owner-operators management and labour.
- Financial returns are shown before finance costs.

6.3 Results of Analysis

Table 3 shows the annual - whole farm budget.

Table 3: Whole Farm Budget – Average Year

						Annual TOTAL
INCOME						
Livestock Gross Income	**Units (head)**		**Income ($/hd)**		**Sub Total ($)**	
Merino Breeding ewes (self replacing) - dual purpose (wool & meat)	700 ewes	@	$176 /ewe		$123,527	
Other					0	$123,527
Crop & Pasture Gross Income	**Area (hectares)**		**Income ($/ha)**	**% Production Retained**	**Sub Total ($)**	
Wheat (grazing & grain)	19.93 ha	@	$1,544 /ha	0%	$30,767	
Wheat (after cereal)	19.93 ha	@	$1,788 /ha	20%	28,505	
Canola (Clearfield)	19.93 ha	@	$2,253 /ha	0%	44,912	
Pasture - perennial (establishment)	19.93 ha	@	-		0	$104,184
Other Farm Income						
Fuel Rebate - general fuel usage*	2,500 L	@	$0.42 /L			1,003
Interest received						0
TOTAL INCOME						**$228,714**
EXPENSES						
Livestock Enterprise Expenses (inc. contract services & shearing)	**Units (hd)**		**Costs ($/hd)**		**Sub Total ($)**	
Merino Breeding ewes (self replacing) - dual purpose (wool & meat)	700 ewes	@	$52 /ewe		$36,467	
Purchase fodder & supplements					0	$36,467
Crop & Pasture Enterprise Expenses (inc. P&E variable costs)	**Area (ha)**		**Cost ($/ha)**		**Sub Total ($)**	
Wheat (grazing & grain)	19.93 ha	@	$563 /ha		$11,215	
Wheat (after cereal)	19.93 ha	@	$572 /ha		11,409	
Canola (Clearfield)	19.93 ha	@	$939 /ha		18,714	
Pasture - perennial (establishment)	19.93 ha	@	$355 /ha		7,076	$48,414
Pasture Variable Expenses (established pasture areas)						
Contact forage conservation (hay/silage)	20 ha	@	$152 /ha		$3,022	
Fertiliser (allowance for maintenance P applications)	1,624 DSE	@	0.8 kg P/DSE x $2.98 /kg P		3,874	
Pest & Weed Control - established pastures	125 ha	@	$50 /ha x 25% area		1,565	$8,460
General & Overhead Expenses						
Pest & weed - general*					$500	
Freight & Cartage - general*					500	
Labour - casual (includes super 9.5% & workers comp. 10.0%)	0.02 FTE	@	$106,080/FTE		2,367	
Labour - permanent (includes super 9.5% & workers comp. 10.0%)	0.00 FTE	@	$90,000/FTE		0	
Contracting - general*					250	
Fuel & Lubricants - general fuel use*	2,500 L	@	$1.25 /L		3,125	
Electricity & Gas					3,000	
R&M - Plant & Machinery					6,375	
R&M - Land & Improvements					7,500	
Licences, Permits & Regos					750	
Rates - Shire & LLS					2,570	
Insurance					1,275	
Bank Fees & Gov't Charges					1,200	
Professional Fees - accounting, legal & other specialist services					2,500	
Telephone, Internet & Postage					660	
Subscriptions, Publications & Advertising					250	
Office & Computer Supplies					250	
Sundry					250	$33,322
TOTAL OPERATING EXPENSES						**$126,664**
OPERATING RETURN						**$102,050**
Land Lease & Rent						$0
Plant & Equipment Finance						0
EBITDA						**$102,050**
Depreciation - P&E	$255,000	@	5.0%			$12,750
OPERATING PROFIT (EBIT)						**$89,300**
Finance Expenses						
Interest - overdraft (allowance)	$0	@	5.5%			$0
Interest - loan(s)	$0	@	3.0%			0
NET PROFIT before tax						**$102,050**
Non Operating Expenses						
Capital Movements						$0
Loan Movements						0
Drawings/Owner Operator Renumeration						0
TOTAL CASH OUTGO						**$126,664**
Net Cashflow						**$102,050**

** - General allowance only: direct enterprise cost for these items included in GM budgets.*

An overview of the key results from the budget is shown in Table 4.

Table 4: Overview - Whole Farm Budget - Average Year

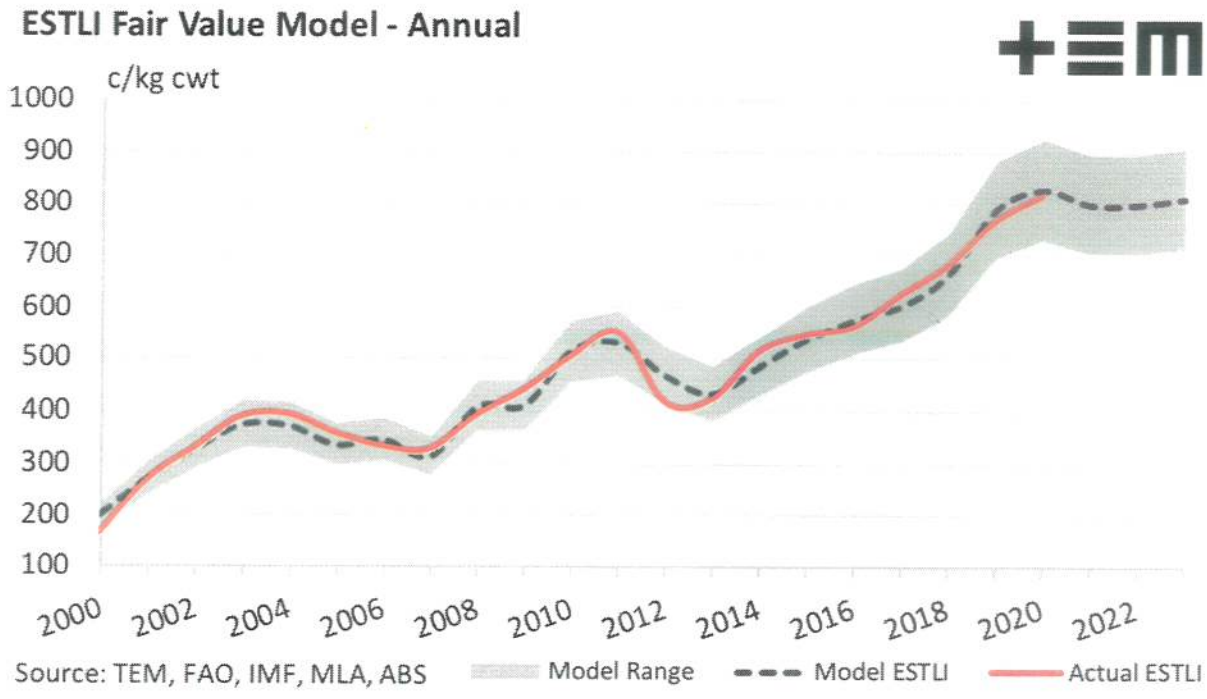
Budget Overview	
Income	$228,714
Operating Expenses	126,664
Operating Return	102,050
Non Operating Costs	12,750
Total Cash Outgo	126,664
Net Cash Surplus/Deficit	$102,050

6.4 Projected Trading

The major factors affecting financial returns from trading are climate and markets for farm input and outputs. The interaction of climate and markets can have both positive and negative impacts on financial returns.

Given the livestock management program is based on dual purpose sheep, sheep prices have a significant impact on the financial returns. Current sheep prices are at historical highs at present but are predicted to be maintained for the foreseeable future. Figure 6 shows the Eastern States Trade Lamb Indicator (ESTLI) actual (2000 – 2020) and modelled (2000 -2023), based on an analysis prepared by TEM (2021).

Figure 6: ESTLI - actual (2000 – 2020) and modelled (2000 -2023)



7 Alternative Sites

7.1 Background

Section 6 presents the financial returns from agricultural production on the proposed Solar Project area.

The following sections present information on the financial returns from alternative sites, in areas with lower agricultural production potential.

7.2 Far West NSW

Due to the combination of climate and soils, NSW Far West generally has a significantly lower agricultural production potential to that of the Solar Project area.

ABARES (2021) Farm Surveys Data for NSW Far West for the period 1990 to 2019 has been used to estimate the actual stocking rates. TIA analysis shows that over the period 1990 to 2019, the median stocking rate was 0.32 DSE per hectare (maximum 0.46 and minimum 0.08). By comparison the assessed carrying capacity for the Solar Project area is 13 DSE/ha.

In Far West NSW there is only limited areas of crop sown. ABARES (2021) data for the period 1990 to 2019 shows that the median proportion of the property sown to crop was only 1.01% (maximum 2.08% and minimum 0.33%).

7.3 Financial Returns

Comparable financial returns can be prepared for the NSW Far West based on the median stocking rate calculated from the ABARES (2021) data.

In the TIA analysis for the NSW Far West operation it is assumed that sheep are the sole enterprise on 186 ha. For simplicity the same sheep gross margin ($/DSE) is applied to the modelled operation in the NSW Far West as that used for the Solar Project area. In reality, the gross margin per DSE may be lower for NSW Far West compared to the Solar Project area.

Farm businesses in the NSW FAR West are much larger than the 186 ha that comprises the Solar Project area. ABARES (2021) data for the period 1990 to 2019 shows that the median property area operated was 31,379 ha. As such, there is some complexity in representing the share of general and overhead expenses associated with 186 ha as part of a much larger operation. For ease of interpretation the TIA analysis has included only allowance for general expenses that are directly linked to the operation of 186 ha.

An overview of the key results from the budget is shown in Table 4.

Table 5: Overview - Whole Farm Budget – NSW Far West

Budget Overview	
Income	$4,512
Operating Expenses	1,868
Operating Return	2,644
Non Operating Costs	250
Total Cash Outgo	1,868
Net Cash Surplus/Deficit	$2,644

Comparing the results of the analysis in Section 6, the annual gross income for Solar Project area is $228,714 compared to $4,512 for NSW Far West. The gross income for 186 ha in NSW Far West is less than 2.0% of the Solar Project area.

8 References

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9 Curriculum Vitae – Richard Ivey

NAME:	Richard Victor IVEY 13 Gipps Street, Wellington, NSW
POSITION:	Agricultural Consultant & Forensic Accountant Tremain Ivey Advisory (formerly with Crowe Horwath)
PROFESSIONAL AFFILIATIONS:	Chartered Accountant (CA) Registered Tax Agent Justice of the Peace
TERTIARY QUALIFICATIONS:	Accounting Conversion (Bachelor of Commerce) University of Tasmania (1980-81) Post-Graduate Diploma of Agricultural Economics, University of New England (1973) Bachelor of Agricultural Science, University of Tasmania (1972)
PROFESSIONAL EXPERIENCE:	Chartered Accountant, Agricultural Advisor & Management Consultant Sydney and Regional NSW Finance Officer, Tasmanian Development Authority Owner and operator of a beef cattle enterprise, Wellington NSW
SPECIAL EXPERTISE:	• Business Assessment, Analysis & Valuation • Appraisal of Investment Proposals • Special Projects and Surveys • Management, Financial and Investigative Accountancy • Assessment of Primary Production Systems

MAJOR PROJECTS:

Farm and Agribusiness Management

- Pre purchase appraisal of agricultural investment proposals. Tasks include: assessment of all resources required for the proposal; quantifying input requirements (including start up and working capital, technical, financial & marketing expertise); development of discounted cashflow budgets and risk analyses.

- Providing ongoing financial and technical expertise to primary producer clients in south eastern Australia. Advice is provided on many aspects of crop, stock and pasture husbandry. Also on enterprise mix, feed utilisation, enterprise analysis and whole farm management including cash flow budgeting and management (ongoing).

- Providing farm management inputs for the management and operation of various properties on behalf of absentee landowners (ongoing).

- Present Value Calculations for future expenses and income. These calculations include all relevant operating and capital income and outgo associated with a broad range of agricultural industries and enterprises. Also the establishment of appropriate discount factors to account for production, market and climatic risk.

- Acted as mediator in disputes between primary producers and trading banks. This was performed under the terms of the NFF/ABA Farm Assessment Scheme.

- Team Leader for a project involving the design and installation of a computerised asset register for a major Australian agricultural company involved in the cotton, beef, sheep and grain industries.

- Negotiated the terms and conditions associated with the leasing of agricultural holdings. Monitored lease progress on behalf of both lessees and lessors. Nominated as arbitrator in respect of past and existing lease agreements.

- Advised on the establishment and operation of a commercial cross-breeding enterprise involving some 2,000 breeding cows.

- Consultant to private consortium looking to market wool to China through direct sale and joint venture arrangements with Chinese processors (ongoing).

- Team leader responsible for the investigation and evaluation of the profit potential of a major Northern Territory abattoir. Work involved documenting and analysing source, type and cost of slaughter cattle over a five year time frame, costs of processing, type and market price of outputs.

Accounting

- Provision of financial and accounting advice to individuals and companies looking to establish, operate and expand small business activities. These businesses are representative of a broad spectrum of agricultural and other industry sectors.

- Preparation of financial statements on behalf of small business clients. These statements are required for management, taxation and compliance purposes.

- Completed business valuations in many industry sectors including retail, professional services, agribusiness, finance, accommodation, construction, and personal services.

- Developed a benchmarking and comparative analysis service for clients aimed at improving their business performance.

- Developed a specialised management accounting service for primary producers. The system involves monthly reporting based on budgeted and actual financial information relating to primary producer clients' farming operations (ongoing).

Land Management, Suitability and Classification

- Assess potential use of multi million dollar South Coast NSW land holding as agricultural land to determine eligibility for exemption from land tax. (Administrative Decisions Tribunal matter).
- Assessments of economic costs associated with granting of Exploration and Mining Leases on agricultural land in the Braidwood, Broken Hill and Northern Tableland districts. (Mining Warden's Court matters).
- Comprehensive assessment of the agricultural value, suitability and classification of land proposed for use as refuse disposal area by Cabonne and Orange City Councils (Land and Environment Court matter).
- Assessment of the effect of large scale Mining development on major grape producer in the Hunter Valley. (Land and Environment Court matter).
- Appraisal and assessment of significant agricultural land holding within Singleton Council boundaries being considered for rezoning purposes.
- S515 of the Local Government Act. (Baulkham Hills Shire Council).

Forensic Accounting

- Examples of large investigative accountancy projects undertaken include:
  - Breach of contract claim involving rural property developer and large investment bank.
  - Class action by over 400 cattle producers.
  - Damage claims arising from various fires involving approximately 200 rural properties.
  - Breach of contract claim involving large contracting firm.
  - Product liability action involving a major grain supplier and a malt manufacturing and export company.
  - Damage claims by Victorian and South Australian potato growers arising from supply of contaminated mother seed.
  - Professional negligence action brought by a prominent venture capital business.
- Acting as an expert witness for litigation matters arising from various causes including negligence, breach of contract, trade practice disputes, personal injury and workers compensation claims. Services provided include investigations, report preparation and presentation of evidence before the Courts.
- Acting as Court appointed expert to assess economic losses of litigants.
- Services provided included complete analysis of financial statements and supporting documents, application of industry statistics, and benchmarks together with analysis of markets, quantification of trends and identification and appraisal of causal factors associated with variation in financial performance.

10 Curriculum Vitae – Andrew Rice

NAME:	Andrew John Rice "Kimbar Park", 252 Mugincoble Lane, PARKES NSW 2870
POSITION:	Agribusiness Consultant, ASPIRE agri
PROFESSIONAL AFFILIATIONS:	Australian Institute of Company Directors – member (2016 to present) and graduate (MAICD, June 2017).
TERTIARY QUALIFICATIONS:	Bachelor of Rural Science (1st Class Hons) 1992 University of New England
PROFESSIONAL EXPERIENCE:	2017 - present: Agribusiness Consultant (ASPIRE agri, Parkes NSW) 2015 - present: Non-Executive Director, Chair since November 2018 (Foundation of Arable Research Australia, ACN 159 209 480) 2015 - 2017: Agribusiness Consultant (ORM, Parkes NSW; ACN 618 781 927) 2012 - 2015: Manager – Regional Grower Services, South (Grains Research & Development Corporation, Parkes NSW) 1999 - 2012: Agribusiness Consultant (WHK Parkes NSW) 1997 - 1999: Agricultural Resource Management Officer (NSW Agriculture, Forbes NSW) 1996 - 1997: Field Agronomist (CRT, Parkes) 1992 -1996: Agronomist & Farm Management Consultant (Ivey ATP, Wellington NSW)
SPECIAL EXPERTISE:	• Applied farm business management; • Farm budgeting, business modelling and performance analysis; • Crop and pasture agronomy; • Livestock and grazing management; • Grain marketing; and • Management of agricultural research, development & extension (RD&E).

Schedule 1

Sheep Enterprise Gross Margin

Merino Breeding ewes (self replacing) - dual purpose (wool & meat)
Merino Ewes (59 kg LWT - 20 micron fleece) joined to Merino Rams

			Av. Growth Rates	Av. Sale Weight (LWT)
	Enterprise Units:	700 ewes	59 kg LWT	
	DSE Rating:	2.32 dse/ewe		
Wethers Sold @:	4.0 months of age	weaners	0.145 kg/day wethers	23 kg
	18.0 months of age	hoggets	0.080 kg/day wethers	48 kg
Ewes Sold @:	4.0 months of age	weaners	0.145 kg/day ewes	23 kg
	18.0 months of age	hoggets	0.080 kg/day ewes	48 kg

INCOME:

Livestock	Livestock Class	Number (head)	Average Carcase (CWT kg/head)	Price (c/kg CWT)	Average Value ($/head)	TOTAL
SALES	Weaner Wethers	301	10 kg	983	$102	$30,828
	Weaner Ewes	-	10 kg	983	$102	0
	Hogget Wethers	-	21 kg	727		0
	Hogget Ewes	90	20 kg		$261	23,490
	Culi Hogget Ewes	14	20 kg		$261	3,654
	CFA/cull Ewes	172	25 kg	633	$157	26,979
	CFA Rams	3	30 kg	448	$134	403
	Total Sales	580	*head*		Sub Total - Livestock	$85,355

Wool	Livestock Class	Number (head)	Average Greasy Wool Production (kg/head)	Greasy Price (c/kg)	Average Value ($/head)	TOTAL
SHEARING	Adults - ewes	672	5.64 kg	758	$42.76	$28,733
	Hoggets - ewes	211	3.70 kg	777	$28.75	6,066
	Rams	14	7.50 kg	758	$56.86	796
	Weaners - ewes	289	1.18 kg	344	$4.06	1,173
CRUTCHING	Adults	714	0.40 kg	390	$1.56	1,114
	Lambs	301	0.30 kg	390	$1.17	352
	Total Wool Production	30	*bales*		Sub Total - Wool	$38,234
					A. TOTAL INCOME	**$123,589**

VARIABLE COSTS:

	Livestock Class	Number (head)	Average Liveweight - LWT (kg/head)	Price (c/kg LWT)	Average Cost ($/head)	TOTAL
PURCHASES	Ewes/Ewe Hoggets	0				
	Rams	4			$2,500	$10,000
	Total Purchases:	4	*head*		Sub Total - Purchases	$10,000

	Livestock Class	Number (head)	Applications	Cost per Application ($/head)		TOTAL
SHEARING & CRUTCHING						
Shearing	Ewes, Hoggets & Lambs	1,172	1	$7.15		$8,380
	Rams	14	1	$10.09		141
Crutching	Ewes, Hoggets & Lambs	1,001	1	$1.41		1,411
	Rams	14	1	$2.33		33
ANIMAL HEALTH						
6-in-1 Vaccine	Ewes/Ewe Hgts/Rams	917	1	$0.24		$220
Internal Parasites	Ewes/Ewe Hgts/Rams	917	2	$0.93		1,706
Jetting (fly control)	Ewes/Ewe Hgts/Rams	917	1	$1.76		1,614
Preg Scanning	Ewes/Ewe Hgts	700	1	$0.80		560
6-in-1 Vaccine	Weaners	623	1	$0.24		$150
Internal Parasites	Weaners - ewes	312	3	$0.44		411
Internal Parasites	Weaners - wethers	312	1	$0.44		137
Jetting (fly control)	Weaners - ewes	211	1	$0.46		97
CONTRACTING						
Lice Control (dipping &	Ewes/Ewe Hgts/Rams	917	1	$1.12		1,027
Mark & Mules	Weaners - ewes	301	1	$4.18		1,258
Mark (only)	Weaners - wethers	301	1	$1.50		452
EAR TAGS	NLIS	623	1	$0.26		162
	Replacement Ewe Hgts	189	1	$1.25		236
LIVESTOCK SELLING COSTS						
Commission, Yard Dues & Transit Insurance				6.0%		5,121
MLA Levies						765
Freight		580		$1.60		928
WOOL SELLING COSTS						
Commission, Warehousing & Testing				$43.00	bale	1,290
Freight		30	bales	$10.00	bale	300
Wool Packs		30	bales	$11.29	pack	339
Wool Tax				1.5%		574
SUPPLEMENTARY FEEDING						0
PASTURE	125 ha	@		$56.00 /ha	maintenance costs	6,996
					B. TOTAL VARIABLE COSTS	**$44,306**

GROSS MARGIN:	Pasture Costs *Excluded*	Pasture Costs *Included*
Total (A-B)	$86,278	$79,283
per ewe	$123.25	$113.26
per DSE	$53.13	$48.82
per hectare	$690.65	$634.65

WOOL PRICES

as at 16/01/2021 WoolCheque

	Specifications	Micron	AWEX Type	Specifications (all 35n/ktex)	Clean Price (c/kg)	Yield	Greasy Price	% Clip
Adults (ewes & rams)								
Fleece	1% VM, 90 mm, 35 n/kte	20	MF5	1% VMB, 90mm	1,230	65%	800	75%
Skirtings / Belli	4.8% VM, 80 mm, 35 n/k	19	MP5	4.8% VMB, 80mm	1,241	56%	695	20%
Cardings	2.9% VM, 90 mm, 35 n/k	20	MZ2	2.9% VMB, 80mm	750	52%	390	5%
						Average	758	
Hoggets								
Fleece						65%	-	75%
Skirtings / Bellies						56%	-	20%
Cardings						52%	-	5%
						Average	-	

DETAILED FLOCK PARAMETERS

General

Enterprise Units:	700 ewes		Birth Weight (kg/hd):	5.25	
Base DSE rating:	2.32 /ewe				
Flock mortality:	4%		Marking %	89%	
			Weaning %	86%	3 months of age
Ewes culled as dry after scanning:		11%			
Ewes culled for other reasons		0%	ie. total ewes culled	11%	
			or	77 ewes	
Rams CFA @:	4 years old				

Mating Management

Joining %:	2.00%		Total Number of Rams:	14 hd
Ewe hoggets culled/not joined:		30.0%		

Marketing Program

Wethers sold as hoggets:	0%
Ewes sold as hoggets:	100%

Grazing Management

Stocking rate/ha:	13.00 DSE

Schedule 2

Wheat (grazing & grain) - GROSS MARGIN

Indicative Program
CW - East

TOTAL AREA:	20 ha	YIELD:	4.90 t/ha			
GRADE:	4 APW1	BASE:	11.0%	Protein		
SILO PRICE:	$315.00 /t	PROTEIN:	11.0%			

INCOME:						**$ / Hectare**	**TOTAL**
GRAIN PAYMENTS		$315 /t	@	4.90 t/ha		$1,543.50	$30,767
LIVESTOCK GRAZING:							
Steers	2.5 hd/ha @	0.8 kg/day	x 60 days x	$3.38 /kg		$405.60	$8,085
			A. TOTAL INCOME			**$1,949.10**	**$38,852**
		Average Grain Price	$398 /t				
VARIABLE COSTS:							
MACHINERY OPERATIONS							
(contract)	*Sowing - direct drill*	$57.00 /ha	@	100% of area		$57.00	$1,136
(contract)	*Spraying*	$10.00 /ha	@	400% of area		$40.00	$797
SPREADING	*Ground Spreading - fertiliser <200 kg/ha*	$105.00 /t	@	0.150 t/ha			
(contract)				100% of area		$15.75	$314
SEED	(retained)	60 kg/ha	@	$0.71 /kg		$42.48	$847
FERTILISER	*MAP*	225 kg/ha	@	$650 /t		$146.25	$2,915
	Urea - granulated	0% of area	(predrilled - prior to sowing)				
		0 kg/ha	@	$560 /t		$0.00	$0
	Urea - granulated	100% of area	(topdress)				
		150 kg/ha	@	$560 /t		$84.00	$1,674
HERBICIDES	*Glyphosate 450 - C*	200% of area	Fallow				
		1.25 L/ha	@	$4.15 /L		$10.38	$207
plus -	*Kombo 950*	0.250 kg/ha	@	$5.00 /kg		$2.50	$50
	Amicide Advanced	100% of area	Fallow	(applied as a mix)			
		0.50 L/ha	@	$7.10 /L		$3.55	$71
	Logran 750 WG	0% of area	Pre-emergent				
		0.035 kg/ha	@	$135.00 /kg		$0.00	$0
	Trifluralin 480/Tref	100% of area	Pre-emergent	(applied as a mix)			
		1.50 L/ha	@	$9.00 /L		$13.50	$269
	Tristar Advance	0% of area	Post - Emergent				
		1.50 L/ha	@	$22.00 /L		$0.00	$0
	Tigrex	100% of area	Post - Emergent				
		0.75 L/ha	@	$12.50 /L		$9.38	$187
	MCPA LVE	100% of area	Post - Emergent	(applied as a mix)			
		0.30 L/ha	@	$11.50 /L		$3.45	$69
FUNGICIDES	*Bayleton/Triad*	100% of area	Post - Emergent				
		0.50 L/ha	@	$5.13 /L		$2.57	$51
	Opus 125	0% of area	Post - Emergent				
		0.25 L/ha	@	$24.00 /L		$0.00	$0
HARVEST	(contract)	4.90 t/ha	@	$15.90 /t		$77.91	$1,553
CARTAGE	(contract)	4.90 t/ha	@	$11.00 /t		$53.90	$1,074
AERIAL SPRA	(contract)	$120.80 /ha	@	0% of area		$0.00	$0
			B. TOTAL VARIABLE COSTS			**$562.61**	**$11,215**
			TOTAL GROSS MARGIN (A-B)			**$1,386.50**	**$27,637**

PARAMETRIC BUDGET ($ per Hectare)

		GRAIN PRICE ($/t)				
		284	299	315	331	364
GRAIN YIELD (t/ha)	3.92	$575.08	$636.82	$698.56	$760.30	$889.95
	4.41	$700.81	$770.27	$839.73	$909.18	$1,055.04
	4.90	$826.55	$903.72	$980.90	$1,058.07	$1,220.14
	5.39	$952.28	$1,037.17	$1,122.06	$1,206.96	$1,385.23
	5.88	$1,078.01	$1,170.62	$1,263.23	$1,355.84	$1,550.32

Schedule 3

Wheat (after cereal) - GROSS MARGIN

Indicative Program
CW - East

TOTAL AREA:	20 ha	YIELD:	5.50 t/ha			
GRADE:	H2	BASE:	11.0%	Protein		
SILO PRICE:	$325.00 /t	PROTEIN:	11.0%			

						$ / Hectare	TOTAL
INCOME:							
GRAIN PAYMENTS		$325 /t	@	5.50 t/ha		$1,787.50	$35,631
			A. TOTAL INCOME			**$1,787.50**	**$35,631**
	Average Grain Price	$325 /t					
VARIABLE COSTS:							
MACHINERY OPERATIONS							
(contract)	*Sowing - direct drill*	$57.00 /ha	@	100% of area		$57.00	$1,136
(contract)	*Spraying*	$10.00 /ha	@	575% of area		$57.50	$1,146
SPREADING	*Ground Spreading - fertiliser <200 kg/ha*	$105.00 /t	@	0.150 t/ha			
(contract)				100% of area		$15.75	$314
SEED	(retained)	50 kg/ha	@	$0.71 /kg		$35.40	$706
FERTILISER	*MAP*	180 kg/ha	@	$650 /t		$117.00	$2,332
	Urea - granulated	0% of area	(predrilled - prior to sowing)				
		50 kg/ha	@	$560 /t		$0.00	$0
	Urea - granulated	100% of area	(topdress)				
		150 kg/ha	@	$560 /t		$84.00	$1,674
HERBICIDES	*Glyphosate 450 - (*	250% of area	Fallow				
		1.25 L/ha	@	$4.15 /L		$12.97	$259
plus -	*Kombo 950*	0.250 kg/ha	@	$5.00 /kg		$3.13	$62
	Amicide Advanced	100% of area	Fallow	(applied as a mix)			
		0.50 L/ha	@	$7.10 /L		$3.55	$71
	Logran 750 WG	0% of area	Pre-emergent				
		0.035 kg/ha	@	$135.00 /kg		$0.00	$0
	Trifluralin 480/Tref	100% of area	Pre-emergent				
		1.00 L/ha	@	$9.00 /L		$9.00	$179
	Tristar Advance	75% of area	Post - Emergent				
		1.50 L/ha	@	$22.00 /L		$24.75	$493
	Tigrex	100% of area	Post - Emergent				
		0.75 L/ha	@	$12.50 /L		$9.38	$187
	MCPA LVE	100% of area	Post - Emergent	(applied as a mix)			
		0.30 L/ha	@	$11.50 /L		$3.45	$69
FUNGICIDES	*Bumper/Aurora/Til*	50% of area	Post - Emergent				
		0.25 L/ha	@	$11.39 /L		$1.42	$28
	Opus 125	0% of area	Post - Emergent				
		0.25 L/ha	@	$24.00 /L		$0.00	$0
HARVEST	(contract)	5.50 t/ha	@	$14.10 /t		$77.55	$1,546
CARTAGE	(contract)	5.50 t/ha	@	$11.00 /t		$60.50	$1,206
AERIAL SPRAY	(contract)	$82.00 /ha	@	0% of area		$0.00	$0
			B. TOTAL VARIABLE COSTS			**$572.34**	**$11,409**
			TOTAL GROSS MARGIN (A-B)			**$1,215.16**	**$24,222**

PARAMETRIC BUDGET ($ per Hectare)

		GRAIN PRICE ($/t)				
		293	309	325	341	375
GRAIN YIELD (t/ha)	4.40	$742.27	$813.77	$885.27	$956.77	$1,106.92
	4.95	$889.34	$969.78	$1,050.21	$1,130.65	$1,299.57
	5.50	$1,036.41	$1,125.78	$1,215.16	$1,304.53	$1,492.22
	6.05	$1,183.48	$1,281.79	$1,380.10	$1,478.42	$1,684.87
	6.60	$1,330.55	$1,437.80	$1,545.05	$1,652.30	$1,877.52

Schedule 4

Canola (Clearfield) - GROSS MARGIN

Indicative Program

CW - East

		TOTAL AREA:	20 ha	YIELD:	3.50 t/ha		
		SILO PRICE:	$625.00 /t	OIL:	44.0%		
INCOME:						**$ / Hectare**	**TOTAL**
GRAIN PAYMENTS			$625 /t	@	3.50 t/ha	$2,187.50	$43,604
	Oil Bonus		$9.38 /t	premium @	2.00%	$65.63	$1,308
				A. TOTAL INCOME		**$2,253.13**	**$44,912**
			Average Grain Price	**$643.75 /t**			
VARIABLE COSTS:							
MACHINERY OPERATIONS							
(contract)	*Sowing - direct drill*		$57.00 /ha	@	100% of area	$57.00	$1,136
(contract)	*Spraying*		$10.00 /ha	@	600% of area	$60.00	$1,196
SPREADING	*Ground Spreading - lime 2.5 t/ha*		$15.50 /t	@	2.50 t/ha		
(contract)					100% of area	$38.75	$772
	Ground Spreading - fertiliser <200 kg/ha		$105.00 /t	@	0.150 t/ha		
					100% of area	$15.75	$314
SEED	*IT - Hybrid*		3.00 kg/ha	@	$34.00 /kg	$102.00	$2,033
(purchased)							
FERTILISER	*Lime (Westlime)*		100% of area	(topdress)			
			2,500 kg/ha	@	$55 /t	$137.50	$2,741
	MAP		150 kg/ha	@	$650 /t	$97.50	$1,944
	SOA - Granular		0% of area	(predrilled - prior to/at sowing)			
			75 kg/ha	@	$445 /t	$0.00	$0
	Urea - granulated		100% of area	(topdress)			
			150 kg/ha	@	$560 /t	$84.00	$1,674
HERBICIDES	*Glyphosate 450 - G*		200% of area	Fallow			
			1.25 L/ha	@	$4.15 /L	$10.38	$207
plus -	*Kombo 950*		0.250 kg/ha	@	$5.00 /kg	$2.50	$50
	Amicide Advanced		100% of area	Fallow	(applied as a mix)		
			0.50 L/ha	@	$7.10 /L	$3.55	$71
	Propyzamide 500		100% of area	Pre-Emergent			
			1.00 L/ha	@	$26.45 /L	$26.45	$527
	Intervix / Intercept		100% of area	Post-Emergent			
			0.60 L/ha	@	$31.00 /L	$18.60	$371
	Select Xtra/Clethod		100% of area	Post - Emergent			
			0.33 L/ha	@	$19.00 /L	$6.27	$125
plus -	*Hasten*		1.00 L/ha	@	$4.70 /L	$4.70	$94
	Lontrel Advanced/C		25% of area	Post - Emergent	(applied as a mix)		
			0.15 L/ha	@	$42.05 /L	$1.58	$31
FUNGICIDES	*Prosaro 420 SC*		100% of area	Post - Emergent			
			0.375 L/ha	@	$74.50 /L	$27.94	$557
INSECTICIDES	*Talstar 250EC*		0% of area	Pre-emergent (bare earth)			
			0.04 L/ha	@	$136.00 /L	$0.00	$0
	Karate Zeon		100% of area	Post - Emergent			
	(aerial application)		0.036 L/ha	@	$108.00 /L	$3.89	$78
WINDROW	(contract)				$37.05 /ha	$37.05	$739
HARVEST	(contract)		3.50 t/ha	@	$42.50 /t	$148.75	$2,965
CARTAGE	(contract)		3.50 t/ha	@	$11.00 /t	$38.50	$767
AERIAL SPRAY	(contract)		$16.20 /ha	@	100% of area	$16.20	$323
				B. TOTAL VARIABLE COSTS		**$938.85**	**$18,714**
				TOTAL GROSS MARGIN (A-B)		**$1,314.28**	**$26,198**

PARAMETRIC BUDGET ($ per Hectare)

		GRAIN PRICE ($/t)				
		375	500	625	656	722
GRAIN YIELD (t/ha)	2.85	$197.00	$564.03	$931.07	$1,022.83	$1,215.52
	3.00	$246.92	$633.28	$1,019.63	$1,116.22	$1,319.06
	3.16	$299.48	$706.17	$1,112.85	$1,214.53	$1,428.04
	3.33	$354.80	$782.89	$1,210.98	$1,318.01	$1,542.76
	3.50	$413.03	$863.65	$1,314.28	$1,426.93	$1,663.51
	3.85	$529.49	$1,025.18	$1,520.87	$1,644.79	$1,905.02
	4.20	$645.95	$1,186.70	$1,727.45	$1,862.64	$2,146.53

Attachment 1

ABARES Farm Survey Data – NSW Far West

Year	ABARES Data						TIA Analysis - based on ABARES data				
	Beef Cattle - numbers as at 30 June		Sheep - numbers as at 30 June		Area Operated - as at 30 June	Crop Area	Total DSE			Stocking Rate	Crop Area
	Cows	Herd (Total)	Ewes	Flock (Total)	(ha)	(ha)	Cattle	Sheep	TOTAL	(DSE/ha)	(% total property
1990	84	170	4,330	8,333	24,478	93	1,281	10,046	11,327	0.46	0.38%
1991	93	190	3,673	6,720	24,888	121	1,418	8,521	9,940	0.40	0.49%
1992	78	146	3,407	5,691	23,842	78	1,190	7,904	9,094	0.38	0.33%
1993	80	174	3,136	5,265	26,697	128	1,220	7,276	8,496	0.32	0.48%
1994	112	227	3,049	5,483	30,327	121	1,708	7,074	8,782	0.29	0.40%
1995	107	227	3,225	5,381	26,207	140	1,632	7,482	9,114	0.35	0.53%
1996	112	217	3,100	5,518	26,328	175	1,708	7,192	8,900	0.34	0.66%
1997	112	219	2,601	4,615	24,072	172	1,708	6,034	7,742	0.32	0.71%
1998	82	182	2,213	3,752	20,154	420	1,251	5,134	6,385	0.32	2.08%
1999	134	260	2,826	4,780	24,368	217	2,044	6,556	8,600	0.35	0.89%
2000	118	238	3,357	5,649	28,051	244	1,800	7,788	9,588	0.34	0.87%
2001	121	256	3,393	5,228	28,523	207	1,845	7,872	9,717	0.34	0.73%
2002	79	153	2,597	3,910	24,677	245	1,205	6,025	7,230	0.29	0.99%
2003	-	148	-	3,221	30,077	249	*2,257*	*343*	*2,600*	0.09	0.83%
2004	-	136	-	3,855	29,788	305	*2,074*	*316*	*2,390*	0.08	1.02%
2005	63	125	2,945	4,306	31,379	418	961	6,832	7,793	0.25	1.33%
2006	96	173	2,417	3,574	27,214	282	1,464	5,607	7,071	0.26	1.04%
2007	73	154	2,456	4,048	30,649	223	1,113	5,698	6,811	0.22	0.73%
2008	100	193	2,424	3,863	23,950	337	1,525	5,624	7,149	0.30	1.41%
2009	94	171	2,008	3,110	22,199	352	1,434	4,659	6,092	0.27	1.59%
2010	117	239	2,188	3,326	25,629	309	1,784	5,076	6,860	0.27	1.21%
2011	136	278	2,579	4,185	26,019	321	2,074	5,983	8,057	0.31	1.23%
2012	134	314	2,739	4,565	24,861	290	2,044	6,354	8,398	0.34	1.17%
2013	176	353	2,448	4,152	23,455	282	2,684	5,679	8,363	0.36	1.20%
2014	125	235	2,969	4,196	25,017	300	1,906	6,888	8,794	0.35	1.20%
2015	144	254	3,216	4,996	27,952	326	2,196	7,461	9,657	0.35	1.17%
2016	148	281	3,488	4,954	29,247	323	2,257	8,092	10,349	0.35	1.10%
2017	135	260	3,265	4,924	27,155	481	2,059	7,575	9,634	0.35	1.77%
2018	100	197	2,422	3,447	26,893	430	1,525	5,619	7,144	0.27	1.60%
2019	75	161	1,796	2,247	29,115	262	1,144	4,167	5,310	0.18	0.90%
High					31,379					0.46	2.08%
Low					20,154					0.08	0.33%
Median					26,268					0.32	1.01%

Document 13: Tremain & Ivey Advising Report 12.12.2022

Tremain Ivey Advisory
Agricultural Consultants

12 December 2022

Glanmire Action Group

Attention: Jonty Boshier
By email only: jonty@hennessydowdlawyers.com

Dear Jonty

Re: Proposed Solar Farm, Glanmire

Thank you for your letter of instruction dated 6 December 2022. Our preliminary comments on the environmental impact statement (EIS) for the Glanmire Solar Farm are as follows:

1 Key values and risks

We disagree with the claim in section 2.4.3 'key values and risks' that sustained intensive agricultural activities such as cropping would not be appropriate. This claim is hypothetical and is apparently based on a soil survey, but is inconsistent the actual capacity of the subject land as follows:

1. Mr Harbison's report (16 November 2020) indicates that the land is identified by the Department of Agriculture as class II 'cultivation' land under the NSW Land Classification system.
2. Mr Harbison's conclusion that the land can be appropriately used for broadacre dryland cropping.
3. Mr Harbison's observation that the subject land and neighbouring land has successfully grown crops.
4. The conclusion in our report dated 19 January 2021 ('2021 report') that the property has supported mixed crop and livestock operations in the past.
5. Satellite imagery which shows past cultivation for crop and pasture.
6. The EIS' own statement that "it has historically been used as agricultural land, showing evidence of both cropping and grazing" (page 26).

2 Alternative sites

In section 2.5.1, the EIS states that "the project site was selected through a screening process based on generation capacity, connection capacity, desk top environmental due diligence studies, high-level ground truthing and landowner interest".

There is nothing in this section that indicates that alternative sites with less impact on agriculture and visual amenity were properly considered.

Several solar farms have been proposed in NSW for lower rainfall non-cropping sites with agricultural productivity 30 to 50 times lower than the Glanmire site.

3 Existing Environment

3.1 Slope

The slope analysis of the project site appears inaccurate and the claimed impact of slope on the land and soil capability of the site is exaggerated.

Figure 6-27 of the EIS purports to show significant areas of the site at between 10% and 20%. However, Figure 1 in our 2021 report shows that the steepest areas have slopes of between 5% and 8%.

The claimed slope is contradicted by the EIS own description of the project site as "gently undulating" (pages 23, 29, 149 and 159).

3.2 Land and soil capability

3.2.1 Background

The EIS claims that 92% of the project site is class 4 land, based on the Land and Soil Capability ('LSC') Assessment Scheme. The remainder is class 5 based on a slope greater than 10%.

The broad-scale mapping of the area indicates that 71% project site is class 3 land, while the remainder is class 5 land. However, the EIS claims that a soil survey undertaken by SLR Consulting ('SLR') indicated the majority of the project was class 4 instead of class 3.

It is noted that the Land & Soil Capability Assessment was only completed by SLR in October 2022, well after substantial resources had been committed to the project by Elgin Energy. It is unclear why this aspect of the investigations was not undertaken at an earlier stage as part of the site selection when most of the subject land was nominally class 3 land according to broadscale mapping, and if (as stated in the EIS page 163) LSC classes 1–3 "*are considered important agricultural land and would typically not be considered appropriate for solar farm development without very strong justification*".

3.2.2 Lack of Consistency with Actual Land Use

The SLR Land & Soil Capability Assessment ('SLR LSC assessment') concludes that the majority of the project land is class 4, and there is no class 3 land. Class 4 land is described by OEH[1] as being "only suitable for intermittent cultivation with specialised practices". This is not consistent with the actual land use of the project site which shows extensive regular cropping.

[1] Office of Environment and Heritage ('OEH') 2012, The Land and Soil Capability Assessment Scheme (second approximation) – a General Land Evaluation System for New South Wales.

Conversely, class 3 land is "capable of sustaining cultivation on a rotational basis. This land can be readily used for a range of crops including cereals, oilseeds and pulses". This description exactly matches the past land use of the project site.

3.2.3 SLR Assessment

In our opinion, the SLR assessment of LSC is deficient in that it does not show that SLR have followed the guidelines for assessing LSC. The SLR report does not set out its assessment of each criteria required to assess each hazard, and does not state how the decision tables were used to assess the LSC class under each hazard.

In addition, the assessment appears to be based on an inadequate soil survey program. Table 3 of the SLR report refers to a 1:100,000 survey density target, or a minimum of 3 sites. However, the solar energy guideline[2] requires an inspection density of 1 site per 5 to 25 hectares. This is equivalent to 7 to 37 sites. However, the SLR assessment involved only 4 “laboratory analysed” sites and only 6 “detailed sites” (including the “laboratory analysed” sites).

The survey density appears insufficient to accurately determine the LSC of the site.

3.2.4 Waterlogging

SLR’s table 11 indicates that waterlogging is the limiting LSC hazard over most of the project site.

For land to be classified as class 4 under the LSC guidelines, it must have a typical waterlogging duration of 2–3 months every 2 to 3 years. By comparison, soil which is waterlogged for up to 2 months every year would be class 1 to 3.

SLR has provided no evidence that the subject land is waterlogged for more than 2 months every 2 to 3 years on average. The LSC guidelines indicate that the assessment of waterlogging hazard should be based on information contained in soil landscape reports and other natural resource products or knowledge from local soil and land practitioners to determine the waterlogging duration and return period.

SLR do not refer to any information contained in soil landscape reports that supports their assessment of waterlogging. More importantly the LSC assessment contains no “knowledge from local soil and land practitioners” to determine the waterlogging duration and return period. Mr Harbison described the surface soil as “free draining”.

SLR indicate that waterlogging was determined by the soils drainage characteristics, “specifically field sample evidence of mottling, soil texture attributes as well as slope and climate”. SLR do not show how these factors were used to determine the claimed waterlogging duration and return period.

SLR’s profile descriptions and soil tests indicate that seasonal waterlogging is not generally a problem in the top 50 cm of the soil profile. The top 15-50 cm of the soil profile at all six sites is described by SLR as well drained, and three of those sites the top 40-50 cm is described as well drained.

[2] ‘Large-Scale Solar Energy Guideline’. Department of Planning and Environment. August 2022.

The soil colours and mottling do not indicate substantial seasonal waterlogging in the top 50 cm in any of SLR's 4 laboratory tested sites. One of the 4 tested sites (BS5) showed no clear evidence of waterlogging to the limit of testing (75 cm deep).

None of the tests or information presented in the SLR report are a definitive measure of the waterlogging duration and return period.

The conclusions concerning waterlogging drawn by SLR are not consistent with the productive nature of the project site.

3.3 Biophysical Strategic Agricultural Land

One of the SLR's 6 detailed soil survey sites (BS5) met all the requirements of biophysical strategic agricultural land ('BSAL'), apart from "poor drainage".

As for LSC (section 3.2.4), SLR's assessment of poor drainage is not adequately supported in their report and is not consistent with the productivity of the project site. The BS5 site is described by SLR as being well drained to a depth of at least 50 cm. Laboratory analysis indicates showed no clear evidence of waterlogging to the limit of testing (75 cm deep) with no mottles to this depth.

In our preliminary opinion, the SLR report does not show that this site is not BSAL.

4 Agricultural productivity and value

The assessed gross income and gross margin of the project area in the EIS is relatively consistent with the assessment in our 2021 report.

While the area of agricultural land taken up by the project is relatively small on a regional scale, the comparison of the project site to the Central West Orana Region on page 186 is inappropriate. This region extends from the Lithgow area in the eastern tablelands to the Bogan Shire in the western plains. Therefore, the comparison that the project site represents 0.0006% of the agricultural holdings within the Central West Orana Region is meaningless.

A more reasonable regional comparison would be to the Bathurst LGA, or to the central tablelands area. The project area is approximately 0.1% of the total agricultural land in the Bathurst LGA.

It is not clear from the EIS that an increase in "diversity of groundcover" will be achieved "with biosecurity management" (page 186), or how this will be achieved. It is also unclear how the project will result in an increase in soil moisture and nutrient holding capacity.

It is also unclear how "appropriate weed management will reduce biosecurity risks" on a regional level. The management of the project land by persons who are not as attuned to biosecurity risks as primary producers is unlikely to reduce biosecurity risks (page 187).

The EIS does not show that insurance premiums of surrounding landowners will not increase due to the construction and operation of the solar farm and offers no mitigating action if that is the case (page 187).

The solar energy guideline requires the proponent to “consider co-location with existing agricultural practices and investigate feasibility of agrisolar where it would result in a meaningful benefit”.

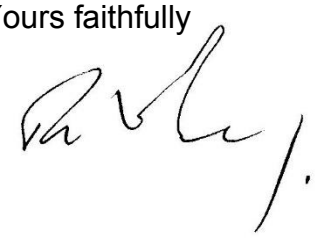
The solar farm would appear to incorporate minimal continued agricultural practices, stating:

- It is anticipated that the existing land use of grazing and cropping will cease within the operational areas of the solar farm, for the life of the Project (page 8).
- The operational solar farm may continue to have some grazing production but is unlikely to generate a meaningful agricultural income (page 177).
- During operation, the Development site would change from agricultural land use to power generation and meaningful agricultural output would cease. While grazing may provide some income and a practical ground cover management strategy, the site would no longer contribute meaningfully to the local agricultural economy, including the service sectors that support it (page 186).
- The key impact will be removal of the grazing regime (page 215).

The EIS has not addressed co-location with existing agricultural practices or investigated the feasibility of agrisolar.

Please do not hesitate to contact me if you have any questions relating to this matter.

Yours faithfully



Richard Ivey

Agricultural Consultant

Email richardi@tiadvisory.com.au

Ref: Comments Glanmire EIS 2022 12.docx

Document 14: C. Mizon Insurance Broker Report February 2021

Glanmire Action Group
Insurance implication caused by a proposed Solar Plant located at 4823 Great Western Highway, Glanmire.

I have been approach by the Action Group to expose the Insurance Implication to the Property Owners immediately adjacent to the Project and to the District and those who work in and around the location.

Of particular concern is the direct consequences to the neighbouring properties:

- 4824 Great Western Highway, Glanmire
- 4657 Great Western Highway, Glanmire
- 4887 Great Western Highway, Glanmire
- And those properties immediately to south, and lying north of the Railway Line or who gain access from Brewongle Lane

Whether you insure or not the first thing you must be aware of that you have duty of care is a legal obligation (that we all have) to take reasonable steps to not cause foreseeable harm to another person or their property.

In tort law, a duty of care is a legal obligation which is imposed on an individual, requiring adherence to a standard of reasonable care while performing any acts that could foreseeably harm others. It is the first element that must be established to proceed with an action in negligence

When a duty of care is owed to a person, and it is breached resulting in injury or damage, the injured person can sue the person who breached the duty of care for damages, which can include:

- Compensation for pain and suffering, and loss of enjoyment of life caused by physical injury, psychological injury or both
- Past loss of earnings
- Loss of future earnings or loss of earnings if your capacity to work is affected
- Past and future medical and related treatment and care expenses
- The past and future costs associated with the care you have been provided by loved ones on a voluntary basis (for example if a family member gives up their time to provide care and assistance to you while you are incapacitated)
- Past and future damages for the loss of capacity to provide voluntary care to dependent(s) (for example if your injury prevents you from caring for someone who depends on you)

The fact that some trade as partnership, trust or Companies does not diminish the obligation one has for another.

So why do we insure and what happens when we insure.

An event that could lead to a successful claim against us (as described above) could financially break us. We purchase insurance to protect our financial position (and not to profit). As most of you can see in the attached Farm Policy there are a great number of types of events that could affect us. For the purpose of this exercise we will limit our concerns to Liability and the Duty of Care we have for other in activities as owners and occupiers of rural enterprises where we live and undertake commercial activities as farmers and graziers.

By the act of purchasing liability insurance you are entering into a contract with a provider to stand by you and provide protection in the event a demand is made against as a result of your action. You

are asking the Insurer to stand in you place and defend and protect you. We will use the most obvious claim event likely to befall and provide the greatest impact on our proposed new neighbour and that is the escape of fire from your farm. You were burning a heap, or a paddock of stubble or simply driving your Ute through a paddock of long grass and fire gets away, jumps the fence and burns out our "new" neighbour.

The Solar Farm's will be insured for full replacement value and for a least 2 or 3 years of Gross Profit whilst they rebuild the complex, but that means you will be dealing with an insurance company…why?

Subrogation is a term describing a right held by most insurance carriers to legally pursue a third party that caused an insurance loss to the insured. This is done in order to recover the amount of the claim paid by the insurance carrier to the insured for the loss.

The Fact is this solar installation on 100ha site and is report ably worth $250,000,000, and that might not include the Loss of Earning.

So you need to purchase liability insurance (and you probably already have),

There are two important questions you need to discuss

How much???

The limit of liability on your current farm policy is probably at best $20,000,000. You need I suspect probably $250,000,000 Liability to protect yourself adequately as a minimum. Such cover is available but may cost in excess of $100,000 per annum. You could maintain an entity like the Glanmire Action Group and use it to insure all the effected parties, but even this cost amortised over the membership every year is a heavy impost to bear.

If you engage sub-contractor to undertake any work on your property it is not unreasonable (but impractical) to compel them to carry the same level of cover. Grain harvesting, and Lucerne baling particularly during the summer months, will leave you both with a heighten level of stress and with the potential for joint action as the property owner could vicarious obligation for liability allowing such contractor to work in those conditions.

Once your existing Limit of Indemnity has been exhausted you will be on your own and your assets will be exposed.

Your current farm package will not offer this additional cover and it will left to an Insurance Broker like me to obtain such protection.

Your Duty of Disclosure???

Whilst most Liability Proposals and Farm Packages don't expressly or specifically ask what neighbours your rural holding (and they probably should) you are then bound by the Duty of Disclosure.

The duty of disclosure requires the insured to make certain disclosures to the insurer before entering into a policy of insurance. The insurer must (if it wants to rely on a breach of the duty) inform the insured of the duty – which must also necessarily occur before the time at which the insured must make the disclosures.

However, a broker's duty is slightly different. A broker has a common law duty to advise their client on the importance and effect of the duty of disclosure. Whenever you take out an insurance policy or you renew or endorse you policy you must advise your insurer &/or broker of any changes

Your Duty of Disclosure:
You have a duty to tell Us before the policy is entered into, every matter known to You which

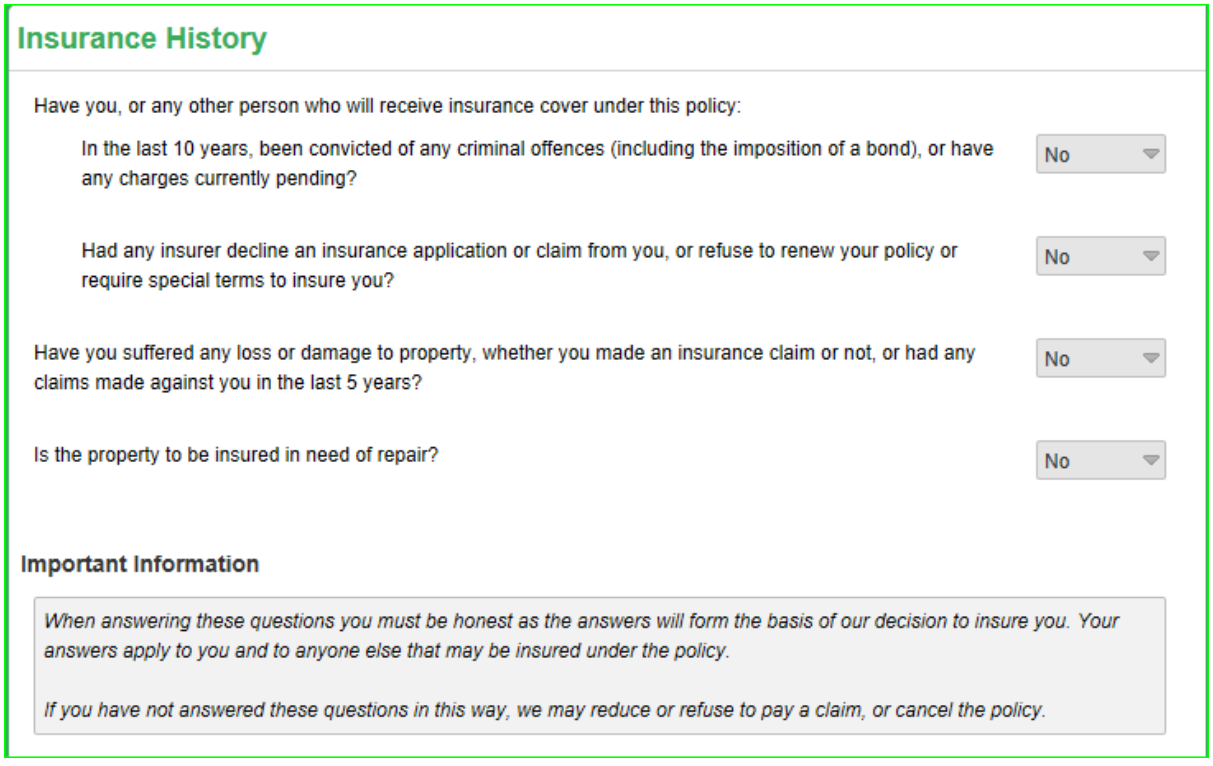
- **You know, or**
- **a reasonable person in the circumstances would be expected to know,**

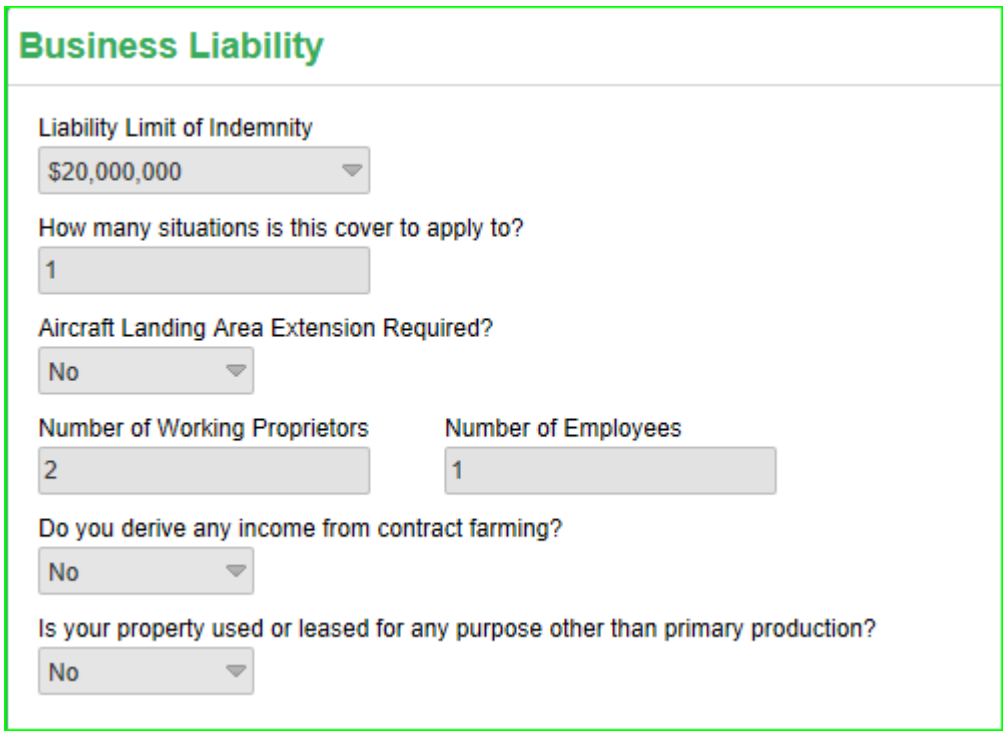
is relevant to Our decision whether to insure You and whether any special conditions need to apply to the policy This duty applies when You renew, extend, vary or reinstate the policy
You do not need to tell Us about any matter:

- **that diminishes Our risk;**
- **that is of common knowledge; that We know or should know as an insurer; or that We tell You We do not need to know**

A material fact is anything that may influence the judgement of prudent insurance underwriter in deciding whether to accept a risk and if so at what premium and terms. Using the insurance principle of 'utmost good faith' you should disclose all the material facts about your risk which you know or should know.

As you can see in the following questions taken for the CGU online system the following are asked but there is no mention of neighbouring.





Of course it is not all on your shoulders and you can push back through the LGA Planning and Development process and/or the Land & Environment Court (if it gets that far). You are not a party to any agreement with the Solar Farm and therefore cannot be held harmless or contract out or cap liabilities.

Kindest Regard

Craig M Mizon - Dip Fin Serv (Brok) ANZIIF (Assoc) QPIB
Director/Principal - Craig Mizon Pty Ltd
Authorised Broker of United Insurance Group
AR 262197 | CAR 276861 | ABN 86 001 261 203

P PO Box 224, Bundanoon NSW 2578
D (02) 8279 8555
M (0418) 461 725
E craig.mizon@uig.net.au

The Coverage – Extracted from the CGU Farm Package
Section 7
Business Liability

Introduction

This section forms part of the policy only if it is shown in the Schedule. If so, it must be read together with the general definitions, terms, conditions, exclusions and limitations expressed in the section 'About Your policy' of this policy and the Schedule.

The insurance cover you select

When You take out insurance under this section, You will be covered for Your legal liability as shown in the policy. This cover will apply up to the amount shown on Your Schedule as the limit of indemnity.

Words that have a special meaning in this section

In this section there are words that have a special meaning. They are listed below. Where these words are used in this section, they are shown with a capital letter. The singular shall include the plural and vice versa, except where the context otherwise requires.

Advertising Injury means injury arising out of:

- libel, slander or defamation.
- any breach of the misleading or deceptive conduct provisions of the Competition and Consumer Act 2010 (Cth) or any Fair Trading or similar legislation of any country, state or territory • any infringement of copyright or passing off of title or slogan
- unfair competition, piracy, idea misappropriation contrary to an implied contract
- invasion of privacy
- arising from any advertisement, publicity article, broadcast or telecast and caused by or arising out of Your advertising activities.

Agricultural Vehicles means agricultural machinery used in the Business including any trailer or implement attached thereto, but excluding any sedan, station wagon, utility, van or goods carrying Vehicle.

Aircraft means any vessel, craft or thing made or intended to fly or move in or throughout the atmosphere or space, other than:

- model aircraft or Drones, and
- unmanned tethered balloons used for advertising purposes.

Aircraft Landing Area means any area on or from which Aircraft land, take off, are housed, maintained or operated.

Approval means a written approval issued to You by the Queensland Department of Main Roads for the driving of Tracked Cane Harvesting equipment across an Approved Single Crossing Point or within a Permitted Zone.

Approved Single Crossing Point means a single crossing point or points approved by the Queensland Department of Main Roads in the Approval.

Business means farming, grazing, cropping, harvesting, or other like primary producing activities or other activities declared to Us in writing and accepted by Us and shown on the Schedule including:

- the ownership and occupation of premises by the Insured
- the provision of any sponsorship, charitable donations, or attendance at any charitable event or gala • canteen, social, sports, welfare, child care services or other activities for the Insured's Employees
- first aid, fire and ambulance services provided by the Insured for the Insured's own internal purposes

- private work undertaken by Employees for any director, partner, officer or executive of the Insured.

Contract Farming means any form of farming activity that You carry on for someone else, for Your own financial reward.

Defence Costs and Expenses means the reasonable legal costs and expenses:

- solely and exclusively incurred by the Insured with the prior written agreement of CGU (which agreement shall not be unreasonably withheld), to defend a claim under this section of this policy for which the Insured is entitled to indemnity
- of any claimant who has made a claim against the Insured which is a claim under this section of this policy for which the Insured is entitled to indemnity under this policy and the Insured is liable to pay those legal costs and expenses
- defence costs and expenses do not include the Insured's own internal costs including wages, salaries or costs of any Insured.

Drone means a remotely piloted aircraft of mass less than one hundred and fifty (150) kilograms excluding any payload.

Employee means any person who is employed by You and/or in respect of whom You are required to have cover for workers compensation or similar cover by any workers compensation legislation.

Employment Practices means any wrongful or unfair dismissal, denial of natural justice, defamation, misleading representation or advertising, sexual harassment or discrimination in respect of employment or prospective employment by the Insured.

Event means:

- a single incident
- a series or number of incidents either having the same original cause or attributable to the one source, or
- continuous or repeated exposure to substantially the same general conditions.

Excess means the first amount of each claim or series of claims arising out of any one Occurrence for which You are responsible. The Excess applicable to this insurance appears in the Schedule. The Excess applies to all amounts for which We are liable.

General Liability means Your legal liability for Personal Injury, Property Damage or Advertising Injury caused by or arising out of an Occurrence happening in connection with Your Business other than Products Liability.

Genetically Engineered or Genetically Modified Substance or Organism means a living plant, animal or microbe that has been altered by the addition or modification of a gene through the process of genetic engineering and contains genes or portions of genes from unrelated organisms.

Geographical Limits means:

- anywhere in the world except North America
- North America but only with respect to:
  - overseas business visits by any of Your directors, partners, officers, executives or employees, who are non-resident in North America but not where they perform manual work in North America
  - Products exported to North America without Your knowledge.

Hovercraft means any vessel, craft or device made to float on or in or travel on or through the atmosphere or water on a cushion of air provided by a downward blast.

Incidental Contracts means:

a) any written rental agreement or lease of real or personal property other than with respect to any term or condition contained in such rental, lease and/or hiring agreement that requires You to insure such property
b) any written contract with any authority or entity responsible for the supply of electricity, fuel, gas, natural gas, air, steam, water, sewerage reticulation control systems, waste

disposal facilities, telephone and communication services or other essential services, except those contracts in connection with work done for such authorities or entities

c) any written contract with any railway authority for the loading, unloading and/or transport of Products, including contracts relating to the operation of railway sidings
d) those contracts designated in the Schedule.

Loading or Unloading goods means the single action of transferring the weight of the goods (or of a portion of a consignment of goods) onto or from the Vehicle.

Named Insured means:

- the person(s), corporations and/or other organisations specified in the Schedule
- every past, present or future director, stockholder or shareholder, partner, proprietor, officer, executive or Employee of the named insured (including the spouse or any Family member of any such person while accompanying such person on any commercial trip or function in connection with the Business), or work experience persons or volunteers while such persons are acting for or on behalf of the named insured and/or within the scope of their duties in such capacities
- every principal in respect of the principal's liability arising out of:
  — the performance by or on behalf of the named insured of any contract or agreement for the performance of work for such principal, but only to the extent required by such contract or agreement and in any event only for such coverage and limits of liability as are provided by this cover section of the policy
  — any Products sold or supplied by the named insured, but only in respect of the named insured's own acts or omissions in connection with such Products and in any event only for such coverage and limits of liability as are provided by this cover section of the policy.
- every person, corporation, organisation, trustee or estate to whom or to which the named insured is obligated by reason of law, (whether written or implied) to provide insurance such as is afforded by this policy, but only to the extent required by such law, and in any event only for such coverage and limits of liability as are provided by this policy
- any director, partner, proprietor, officer or executive of the named insured in respect of private work undertaken by the named insured's Employees for such person and any Employee whilst actually undertaking such work
- the estates, legal representatives, heirs or assigns of:
  — any deceased or insolvent persons, or
  — persons who are unable to manage their own affairs by reason of mental disorder or incapacity, who would otherwise be indemnified by this cover section of the policy, but only in respect of liability incurred by such persons as described in the two clauses above
- every party including joint venture companies and partnerships to whom the named insured is obligated by virtue of any contract or agreement to provide insurance such as is afforded by this cover section of the policy; but only to the extent required by such contract or agreement and in any event only for such coverage and limits of liability as are provided by this cover section of the policy.
- all existing subsidiary and/or controlled corporations (including subsidiaries thereof) of the named insured incorporated in the Commonwealth of Australia and/or any other organisations under the control of the named insured
- all subsidiary and/or controlled corporations (including subsidiaries thereof) of the named insured and/or any other organisations under the control of the named insured incorporated in the Commonwealth of Australia and which are constituted or acquired by the Insured after the commencement of the Period of Insurance
- every subsidiary and/or controlled corporation and/or other organisation of the named insured which is divested during the Period of Insurance, but only in respect of claims made

against such divested subsidiary, related or controlled corporation or organisation caused by or arising out of Occurrences insured against by this policy, which occurred prior to the divestment.

- the named insured
- any Employee superannuation fund or pension scheme managed by or on behalf of the named insured, and the trustees and the directors of the trustee of any such Employee superannuation fund or pension scheme which is not administered by corporate fund managers
- every officer, member, Employee or voluntary helper of the named insured's canteen, social and/or sporting clubs, first aid, medical, ambulance or fire- fighting services, charities, welfare and/or child care facilities, while acting in their respective capacities as such

North America means:

- the United States of America and the Dominion of Canada • any state, territory or protectorate incorporated in, or administered by, the United States of America or the Dominion of Canada
- any country or territory subject to the laws of the United States of America or the Dominion of Canada.

Occurrence means an Event including continuous or repeated exposure to substantially the same general conditions which results in Personal Injury, Property Damage or Advertising Injury neither expected nor intended from the standpoint of the Insured.

- All Events of a series consequent on or attributable to one source or original cause are deemed one Occurrence.
- All Advertising Injury arising out of the same injurious material or act (regardless of frequency or repetition thereof, the number and kind of media used or the number of claimants) are deemed one Occurrence

Permitted Zone means a zone approved by the Queensland Department of Main Roads in the Approval.

Period of Insurance means the period stated in the Schedule. It does not refer to any prior period of insurance if the policy is a renewal of a previous policy or any future period of insurance for any policy the insured may enter into with Us upon renewal. Each period of insurance is treated as separate.

Personal Injury means any of the following:

- bodily injury, death, sickness, illness, disability, disease, shock, fright, mental anguish or mental injury, loss of consortium or services resulting therefrom
- false arrest, wrongful detention, false imprisonment, malicious prosecution or humiliation
- wrongful entry, eviction or other invasion of right of privacy
- defamation, libel or slander, unless arising out of Advertising Injury
- assault and battery not intentionally committed by or at the direction of the Insured unless so directed for the purpose of preventing or eliminating danger to persons or property.

Pollutants mean any solid, liquid, gaseous or thermal irritants or contaminants, including, but not limited to, smoke, vapour, soot, fumes, acids, alkalis, chemicals and waste. Waste includes material to be recycled, reconditioned or reclaimed.

Products mean anything (after it has ceased to be in the possession or under Your control), which is or is deemed to have been manufactured, grown, extracted, produced, processed, imported,

exported, constructed, assembled, erected, installed, repaired, serviced, renovated, treated, sold, supplied or distributed by or on behalf of the Insured including any discontinued products, labels packaging or containers, the design specification or formula of any products and including directions and instructions, advice given or omitted to be given in connection with such products.

The term 'product' shall not be deemed to include food and beverages:

- sold or supplied by or on Your behalf from any canteen or vending machine primarily for the use of Your Employees
- served to Employees or guests for consumption on any of Your property or premises.

Products Liability means Your legal liability for Personal Injury and/or Damage to Property caused by or arising out of any:

- Products, or
- reliance upon a representation or warranty made at any time with respect to such Products.

Property means:

- physical property not in Your possession or control
- premises that You occupy for the purpose of Your Business
- Vehicles in Your possession or control while in a car park:

i. owned, occupied, or leased by You
ii. not forming part of a building construction or work site, and
iii. for the use of which You do not charge a fee.

Property Damage means:

- physical loss, destruction of or damage to tangible Property including the loss of use thereof at any time, resulting therefrom and/or
- loss of use of tangible Property which has not been physically lost or destroyed or damaged:

Tool of Trade means a Vehicle that has tools, implements, machinery or plant attached to any Vehicle and is being used by the Insured at any worksite or insured premises. Tool of Trade does not include any Vehicle whilst travelling to or from a worksite or Vehicles that are used to carry goods to or from any premises.

Tracked Cane Harvesting Equipment means a machine which:

- is independently powered by an internal combustion or electrical engine, and
- cuts sugar cane, separates the cane form the leaves and collects fallen or cut cane, and
- uses metal tracks not wheels for its locomotion.

Vehicle means any type of machine on wheels, self-laid tracks or skis made or intended to be propelled other than by manual or animal power and any trailer or attachment whilst attached to or used in conjunction with any such machine including Tracked Cane Harvesting Equipment.

Watercraft means any vessel, craft or thing designed to float on or in, or travel on, or through water, other than model boats.

When we will pay

Subject to the terms, exclusions, definitions, endorsements and limitations of this policy, We will indemnify the Insured for all amounts which the Insured is legally liable to pay as compensation in respect of:

- Personal Injury
- Property Damage

- Advertising injury,

happening during the Period of Insurance within the Geographical Limits and arising out of the Business or Your Products and caused by or arising out of an Occurrence We will also pay the amount you are legally liable to pay for Personal Injury, Damage to Property or Advertising Injury due to an Occurrence in Australia and in connection with Your Business, arising from:

- Your ownership or occupancy of any land, building or structure
- private work carried out for You or by Your Employees
- any of the Products.

We will also pay the amount You are legally liable to pay for Personal Injury, Damage to Property or Advertising Injury due to an Occurrence outside Australia and in connection with Your Business, arising from:

- the performance of work by You or any of Your Employees who are normally resident in Australia other than the performance of any manual work outside Australia
- any of the Products.

We will not pay for any claims brought against You in, or caused by Products exported by You or any other party to, any country on the continent of North America.

Defence costs and expenses

With respect to the indemnity provided by this section of the policy, We will:

- defend, in Your name and on Your behalf, any claim or suit against You alleging Personal Injury, Property Damage or Advertising Injury and seeking damages on account thereof even if any of the allegations made in any such claim or suit are groundless, false or fraudulent
- pay all charges, expenses and legal costs incurred by Us and/or by You with Our prior written consent:
  — pre-judgment interest awarded against You on that part of the judgment payable by Us
  — in the investigation, defence or settlement of any such claim or suit, including loss of salaries or wages because of Your attendance at hearings or trials at Our request, or
  — in bringing or defending appeals in connection with such claim or suit:
- pay all charges, expenses and legal costs recoverable from or awarded against You in any such claim or suit and all interest accruing on Our portion of any judgment until We have paid, tendered or deposited in court that part of such judgment which does not exceed the limit of Our liability.
- pay premiums for:
  — bonds to release attachments for amounts not exceeding the applicable Limit of Liability of this Policy but We will have no obligation to apply for or furnish any such bonds
  — appeal bonds and/or security for costs required in any suite but We shall have no obligation to apply for or furnish any such bonds and/or security for costs • pay expenses incurred by You for:
  — rendering first aid and/or surgical and/or medical and/or therapeutic relief to others at the time of Personal Injury (other than any medical expenses which We are prevented from paying by law)
  — temporary protection of damaged or undamaged property of any person or party, including temporary repairs, shoring up and/or unpinning thereof
  — purchasing and/or hiring and/or erection and dismantling of hoarding, barriers, fences and any other form of temporary protection, including any such protection which You are required to provide by any Government, Local Government or other Statutory Authority
- pay all legal costs incurred by You with Our consent for representation of You at any:
  — Coronial inquest or Inquiry
  — proceedings in any court or tribunal relating to liability insured against by this section of the policy
  — Royal Commission or Government enquiry arising out of any alleged breach of statutory

duty or similar judicial enquiry into circumstances relating to an Occurrence
— enquiry, prosecution or hearing of a disciplinary nature held before a legally constituted board, committee, licencing authority or the like

Provided that our liability under the last two bullet points shall not exceed $250,000 in respect of any one Occurrence.
Any amounts paid by Us as Defence Costs and Expenses and/or supplementary payments incurred, will be in addition to the applicable limit of liability.
However, in respect of any claims or suits originating in any court in North America, the applicable limit of liability will include all amounts paid by Us as Defence Costs and Expenses.
Where We are prevented by law or otherwise from making payments on Your behalf, We will indemnify You for legal liability incurred to the extent that such liability is covered by this policy.
In jurisdictions where We may not legally be permitted to, or cannot for any other reason, defend any claim or suit against You, We will reimburse You for the costs of defending that claim or suit incurred with Our prior written consent.

Policy limitations
Subject to:
• the 'Claim preparation expenses' provision under 'General Policy Conditions'
• the 'Defence costs and expenses' clause above
• the 'Property in the physical or legal control' clause in this section
For General Liability the limit of indemnity specified in the Schedule represents the maximum amount which We shall be liable to pay in respect of any one claim or series of claims arising out of any one Occurrence.
For Products Liability the limit of indemnity specified in the Schedule represents the maximum amount which We shall be liable to pay in respect of any one claim or series of claims, and in the aggregate during any one Period of Insurance.
The applicable limit of indemnity will not be reduced by the amount of any Excess payable by You.

Excess
The Excess shall apply to each Occurrence.

Additional things we will cover when you have insured for business liability Where You have insured under this section, We will automatically extend Your policy to include Your legal liability for the following. All the terms and conditions of the policy will apply to these additional benefits unless We indicate otherwise.

Cross liabilities
Where more than one party comprises the Insured each of the parties shall be considered as a separate and distinct entity and the word Insured shall be considered as applying to each party in the same manner as if a separate policy had been issued to each, provided that nothing in this clause results in the increase of the limit of liability in respect of any Occurrence or Period of Insurance.

Property in the physical or legal control
We will indemnify You against Your liability for physical damage to or physical destruction of property, livestock or birds that is in Your physical or legal control as though it were Property Damage including:

- any other property temporarily in the Insured's possession for the purpose of being worked upon
- use of any Vehicle or Tracked Cane Harvesting Equipment temporarily in Your physical or legal control for the purpose of parking, storage or loading

- the personal property, tools and effects of any of Your directors, partners, proprietors, officers, executives or Employees, or the clothing and personal effects of any of Your visitors.

We will pay up to $100,000 for any one animal.
The most We will pay under this benefit for all liability, for all the parties We are indemnifying, arising during the Period of Insurance, is $250,000.

Lease or tenancy agreements
We will pay the amount You are legally liable to pay for Personal Injury or Property Damage, which happens during the Period of Insurance, due to an Occurrence arising from any lease or tenancy agreement that You have entered into for Your occupancy of land, buildings or structures in connection with Your Business.
The most We will pay for any Personal Injury or Property Damage, due to an Occurrence, is the amount shown on Your Schedule as the limit of indemnity.
We will not pay for any liability under this benefit for:

- any liquidated damages or penalties
- any breach or non-performance of covenants or conditions relating to the use, maintenance and upkeep of the land, buildings or structures
- Your obligations to hold insurance over the land, buildings or structures.

Ramps, motor bypasses, railway crossings
We will pay the amount You are legally liable to pay for Personal Injury or Property Damage, which happens during the Period of Insurance, due to an Occurrence arising from any guarantee given by You, in accordance with any statutory requirement, for any ramp, motor bypass, underpass, railway crossing, irrigation channel or water main.
The most We will pay for any Personal Injury or Property Damage, due to an Occurrence, is the amount shown on Your Schedule as the limit of indemnity.

Registered agricultural vehicles
We will pay the amount You are legally liable to pay for Property Damage, which happens during the Period of Insurance, due to an Occurrence arising directly or indirectly from Your ownership, physical or legal control, or use by You or on Your behalf, of any Agricultural Vehicles which are registered.
We will not pay if the Occurrence happens more than fifty (50) kilometres from the Situation, unless the Agricultural Vehicles are being serviced or repaired or in direct transit to or from being serviced or repaired.
The most We will pay for any Property Damage, due to an Occurrence, is the amount shown on Your Schedule as the limit of indemnity.

Use of drones
We will pay the amount You are legally liable to pay for Personal Injury or Property Damage, which happens during the Period of Insurance, in respect of the use of a Drone whilst being used for:

- photography including infra-red and thermal imaging, Normalised Difference Vegetation index photography
- surveying
- bird scaring
- mustering or herding
- locating livestock
- inspecting crops
- carrying of payloads,

provided that:

- the Drone is used in accordance with the Civil Aviation Safety Authority rules in relation to remotely piloted aircraft (RPA's) including Part 101 Amendments, which include but are not

limited to:
— the Drone must be operated during daylight and within the line of sight
— the Drone is not flown within thirty (30) meters of vehicles, boats or people that are not on the insured's private property
— the Drone is not flown higher than one hundred and twenty (120) meters or four hundred (400) feet above ground level
— the Drone is not flown within five and a half (5.5) kilometres of a controlled aerodrome
— the Drone is not flown over populous areas such as beaches, heavily populated parks, sports ovals or other people's back yard
— the Drone must not be flown near an area affecting public safety or where emergency operations are underway such as a car crash, police operation, search and rescue or firefighting operations

We will not pay any amounts You are legally liable to pay for Personal Injury or Property Damage which arise directly or indirectly out of the use of a Drone for crop spraying.

Additional things you can insure for under business liability

You may extend Your policy to include the following cover.
If We have agreed to extend Your policy, this will be shown on Your Schedule and all the terms and conditions of the policy will apply to this benefit unless We indicate otherwise.

Aircraft Landing Area – where a fee is charged.
We will pay the amount You are legally liable to pay for Personal Injury or Property Damage due to an Occurrence, arising out of Your ownership, occupancy or control of any Property or structure at the Situation, which is used as an Aircraft Landing Area, for which a fee is charged.
The most We will pay under this benefit for all claims during any one Period of Insurance is the amount shown on Your Schedule as the limit of indemnity.

Farm hosting – the definition of Business is extended to include the provision of leisure activities, accommodation and/or meals to guests of Your farm for which You receive payment.

Aerial crop spraying – aerial spraying

We will pay the amount You are legally liable to pay for an Occurrence, resulting from the spraying of chemicals, from an Aircraft, used by a contractor on Your behalf.
You must take reasonable precautions to ensure that the chemicals are applied in accordance with the manufacturer's guidelines.
The most We will pay during any one Period of Insurance is:

- limited to $100,000 if the spraying of chemicals from an Aircraft is done in connection with cotton farming, or
- limited to $1,000,000 if the spraying of chemicals from an Aircraft is done in connection with farming other than cotton farming.

When we will not pay

We will not pay claims in respect of the following:

Advertising injury

Any Advertising Injury arising out of or in any way connected with any:

- statement made by, or at the direction of an Insured where the Insured knew or suspected the statement or any part of the statement was false.
- any breach of the misleading or deceptive conduct provisions of the Competition and Consumer Act 2010 (Cth) or any Fair Trading or similar legislation of any country, state or territory

- failure to perform any obligation pursuant to any contract. This exclusion does not apply to any claim for unauthorised appropriation of advertising ideas contrary to an implied contract.
- incorrect description of Products, goods or services
- any mistake in the advertised price of Products, goods or services
- failure of Products, goods or services to conform with advertised performance, quality, fitness or durability
- Insured whose Business is advertising, broadcasting, publishing or telecasting.

Employers liability
Liability:

- caused by or arising out of bodily injury to any worker in respect of which You are or would be entitled to indemnity under any policy of insurance, fund, scheme or self-insurance pursuant to or required by any legislation relating to Workers Compensation or Accident Compensation whether or not such policy, fund, scheme or self-insurance has been effected. Provided that this policy will respond to the extent that Your liability would not be covered under any such policy, fund, scheme or self-insurance arrangement had You complied with its obligations pursuant to such law.
- imposed by:
  i. the provisions of any industrial award or agreement or determination or any contract of employment or workplace agreement where such liability would not have been imposed in the absence of such industrial award or agreement or determination or contract of employment or workplace agreement
  ii. any law relating to Employment Practices.
- For the purpose of the two bullet points above:
  i. the term 'worker' means any person deemed to be employed by You pursuant to any Workers Compensation Law. Voluntary workers, secondees and work experience students (if any) shall not be deemed to be Your Employees
  ii. the term 'bodily injury' means bodily injury, death, sickness, disease, illness, disability, shock, fright, mental anguish and/or mental injury, including loss of consortium or services resulting therefrom.

Mental anguish to employees
Liability for mental anguish suffered by any person arising out of, or in the course of, that person's employment by, or service to You.

Harassment, libel, slander to employees
Liability for Personal Injury arising out of the harassment, libel, slander, defamation or humiliation of, or discrimination against, any person while in Your service or while employed by You.

Fines and penalties
Liability for fines or penalties, or punitive, exemplary or aggravated damages.

Building and demolition liability
Liability in connection with:

- the erection, demolition or alteration of or addition to buildings not owned or occupied by You
- the erection, demolition or alteration of or addition to buildings owned or occupied by You where the total cost of the alteration or addition exceeds $500,000.

Faulty workmanship

Liability to perform, complete or rectify any work undertaken by You or on Your behalf, or to pay the cost of performing, completing or rectifying such work.

Contract farming
Liability arising out of Contract Farming. This will not apply where Contract Farming income does not exceed the lesser of twenty per cent (20%) of Your farming income or $100,000.

Property owned by you
Damage to Property owned by You

Host farm and outdoor activities
Where You are receiving payment for host farm, outdoor or recreational activities, We will not indemnify You against liability in connection with:

- any activity involving weapons, including firearms
- the riding of horses or any other animal, and rodeos
- riding in or on an animal drawn Vehicle or implement where the person in control of the animal(s) is not the Named Insured or a director of the insured entity
- mountaineering, rock climbing, any abseiling activity, or any activity where people are guided through or directed into underground mines, shafts, caves or caverns
- participation in an activity on, in or under water other than fishing from a jetty, bank or wharf, or swimming in a constructed swimming pool
- canoeing, rafting, water-skiing or use of power craft
- any form of aerial fight or aerial activities
- any activity involving the riding or use of motor cycles, motor tricycle, quad bike, motorised buggy or any Vehicle operating on fixed tracks
- any activity involving the use of any Vehicle which is required by law to be insured for liability for Personal Injury and the Occurrence is, or would be, insured by such insurance
- any activity where the person driving is not the named insured or a director of the insured entity
- operation of any Agricultural Vehicles or equipment
- use of or participation with chemicals.

Aircraft landing area
Liability arising out of Your ownership, occupancy or control of any Property or structure which is used as an Aircraft Landing Area where a fee is charged for the use of the Aircraft Landing Area, unless Your Schedule shows You have taken out cover for Aircraft Landing Areas. We will not pay for any liability where an Aircraft Landing Area does not conform with any legislation, regulations or codes of practice relating to landing areas.

Aircraft, hovercraft, watercraft
Liability in connection with Your ownership or physical or legal control of, or use by You or on Your behalf of any:

- Aircraft
- Hovercraft
- Watercraft greater than eight metres in length, except while stored on land.

Vehicles
For Personal Injury or Property Damage arising out of the ownership, possession or use by You of:
a) any Vehicle which is registered or which is required under any legislation to be registered, or
b) any Vehicle in respect of which compulsory liability insurance or statutory indemnity is required by any legislation (whether or not that insurance is effected), or

c) Tracked Cane Harvesting Equipment.
However exclusions a), b) and c) shall not apply where:

- that compulsory liability insurance or statutory indemnity does not require indemnity for Personal Injury or Property Damage, and • the reason or reasons why that compulsory liability or statutory indemnity does not provide indemnity for Personal Injury or Property Damage do not involve any breach by You of any legislation relating to Vehicles or Tracked Cane Harvesting Equipment or the Motor Insurance Act 1994 (Qld), or
- the Personal Injury or Property Damage arises as a result of the use of any Vehicle or Tracked Cane Harvesting Equipment (including any tool or plant forming part of or attached to or used in connection with such Vehicle or Tracked Cane Harvesting Equipment) whilst being operated or used by You or on Your behalf as a Tool of Trade at Your premises or on any work site, or
- the Personal Injury or Property Damage arises from the delivery or collection of goods or produce to or from any Vehicle or Tracked Cane Harvesting Equipment
- the Personal Injury or Property Damage arises from the Loading or Unloading of any Vehicle or Tracked Cane Harvesting Equipment
- the Personal Injury or Property Damage arises as a result of the use of any Vehicle or Tracked Cane Harvesting Equipment temporarily in Your physical or legal control for the purpose of parking, storage or loading
- any cover under the bullet clauses above is only provided to the extent it does not involve either the provision of CTP Insurance or the provision of cover in contravention the Motor Insurance Act 1994(Qld).

Libel or slander
Liability in connection with the publication or utterance of a libel or slander:

- made before the commencement of the Period of Insurance
- made by You or at Your direction with the knowledge of its falsity
- related to publishing, advertising, broadcasting or telecasting activities conducted by You or on Your behalf.

Breach of professional duty
Liability caused by or arising out of any breach of duty owed in a professional capacity by You and/or any person(s) for whose breaches You may be held legally liable, but this exclusion shall not apply to claims for Personal Injury and/or Property Damage:

- arising out of the rendering of or failure to render professional medical advice by medical persons employed by You to provide first aid and other medical services on Your premises
- arising out of advice which is given by You for no fee
- arising out of advice given in respect of the use or storage of Your Products.

Product defects
Any liability arising out of or in any way connected with Property Damage by any Products if the damage is attributed to any defect in them or to their harmful nature or unsuitability. This exclusion is restricted to the defective or harmful or unsuitable part of a damaged Product and does not apply to any resultant damage caused to the remainder of the Product.

Aircraft products
Liability caused by any of the Products manufactured for and installed, or intended to be installed, in an Aircraft.

Product recall
Liability to pay:

- for the cost of recall, withdrawal from sale, inspection, repair or replacement of Your Products
- for the cost of investigation into the cause of any defect
- in connection with the loss of use of Your Products.

Contractual liability
Your legal liability arising from any agreement or contract You enter into. This does not apply if You would have been liable without the agreement or contract. This also does not apply to lease or tenancy agreements or contractual liability for ramps and/or motor bypasses or irrigation channels as set out in this section under, 'Additional things we will cover when you have insured for business liability'. We will pay for Your legal liability for Personal Injury or Property Damage arising under any other agreement entered into by You, if We have consented in writing to cover You for this agreement, and it is shown on Your Schedule.

Pollution
Your liability:
- in connection with pollution occurring in North America or subject to jurisdiction of North America
- to pay the cost of preventing the discharge, dispersal, release or escape of Pollutants
- for an Occurrence in connection with the discharge, dispersal, release or escape of Pollutants; or the cost of testing, monitoring, containing, removing, cleaning up or neutralizing Pollutants.

This exclusion shall not apply where discharge, dispersal, release or escape of Pollutants:
- is caused by a single accident
- is instantaneous
- is clearly identifiable, and
- is confined to one specific location.

Asbestos
Any liability arising out of or in any way connected with any claim or claims in respect of Personal Injury, Property Damage, Advertising Injury, loss or losses arising directly or indirectly out of, or in any way connected with asbestos in whatever form or quantity.

Aerial application
Liability due to any material or substance being applied to land or anything grown on the land by an Aircraft unless You have selected the 'Aerial crop spraying - aerial spraying' extension and this extension appears on your Schedule.

Genetically modified organisms
Liability in connection with Personal Injury or Property Damage or any loss whatsoever, caused by or arising out of, any genetically modified Product, grown, stored, sold, transported, processed, handled or distributed by You where the Personal Injury, Property Damage or loss has been caused by, contributed to, or has arisen through Your non-compliance with any law, by-law, regulation, licensing condition or recognised standard for the growing, manufacture, handling, transport, storage, processing, sale, supply or distribution of any genetically modified Product.

Firearms
Liability for Personal Injury or Property Damage directly or indirectly caused by or arising out of an activity involving the use of a firearm, unless the Personal Injury or Property Damage is directly caused by Your use of the firearm or by someone You have agreed to pay to use the firearm.

Paying claims

Policy excess
For each liability claim, We will reduce the amount of the claim by the Excess. The amount of Your Excess is shown on Your Schedule or in this section.

How we pay a claim for your business liability
Please refer to 'How to make a claim under Your policy' and 'What You must do when You make a claim' and 'What You must do when You make a claim' in the 'Your policy' section at the front of this policy.

Special conditions

- You must:
  — take all reasonable precautions to prevent:
  Personal Injury or Property Damage
  the manufacture, sale or supply of defective Products.
  — comply with, and ensure that Your Employees, servants and agents comply with, all laws, bylaws, regulations and recognised standards for the safety of persons or Property
  — ensure that only competent Employees use, operate, maintain and service plant and equipment
  — maintain all premises, fittings, plant and equipment in sound condition
  — take immediate action to trace, recall or modify all Products that You know or have reason to suspect to contain a defect or deficiency.
- When You make a claim under this section, We shall have the right to conduct Your defence, to instruct lawyers to provide advice as to Your liability and to represent You.
- We may at any time pay to You the appropriate limit of liability (after deducting from it any amounts already paid) or any lesser amount for which a claim or claims may be settled. In doing so, We relinquish the conduct of, and shall be under no further liability in connection with, such claim or claims except for costs and expenses incurred before We made such payment.
- We may take over and conduct in Your name the defence or settlement of any claim or issue legal proceedings for damages and/or of any claim or legal proceedings for recovery of any amounts paid by Us under this policy. We have full discretion in the conduct of any legal proceedings and in the settlement of any claim.

Document 15: D. Harbison Report Update 15.06.22

Peer Review – Elgin Energy EIS Submission 9th December 2022

Glanmire Action Group

C/- Jo Petch
264 Brewongle Lane
Glanmire, NSW 2795

Private and Confidential

D R Agriculture Pty Limited
As trustee for the D R H Agricultural Trust ABN: 51 068 260 644

2470 Mitchell Highway
Molong NSW 2866
Ph: 0408 820 467 / 02 6366 9118

Jo Petch
Secretary/Coordinator
Glanmire Action Group
264 Brewongle Lane,
Glanmire 2795

December 9th, 2022

Peer Review – Elgin Energy EIS Submission

Dear Jo,

The report attached summarises my review of relevant sections of the EIS, as submitted by Elgin Energy.

Should you wish for further clarification of any of the material presented, please do not hesitate to contact me.

Yours sincerely,

David Harbison
Director.

Peer Review Report – Elgin Energy EIS

I, David Harbison, of D R Agriculture Pty Ltd, 2470 Mitchell Highway, Molong, being an independent agronomist / agricultural advisor say;

1. I wish to have noted that my views in my previous reports, 16th November 2020 and 8th June 2022 have not changed, and remain supported by the NSW Department of Planning, Industry and Environment's eSpade service, 'Raglan Soil Landscape' (espade.environment.nsw.gov.au) who classify the soil and land capability as Class 2 and Class 3. Within the Raglan Soil Landscape document, it is noted for the Solodic soils (of which much of the proposed site has been classified as) that the 'erodibility' rating of the topsoil is "high" and of the subsoil is "moderate or high". As an advisor, that information guides me strongly as to how such a site should be managed; disturbed physically as little as possible and try at all cost not to expose the subsoil. Such exposure can easily transform Class 2 or Class 3 land into Class 5 land as shown in figure 1 (photograph 5a of the OEH document). With today's best management practices employed by the current operators of the proposed site, the use of "no-till", "direct drill" and "conservation farming" activities, along with rotational grazing of crops and pastures, it shows clear evidence of 'careful management' as suggested by OEH for Class 3 land. That is exactly what is occurring at the site with little or no land or environmental degradation evident.



Figure 1 - Image from *The Land and Soil Capability Assessment Scheme* of Class 5 land (source – *The Land and Soil Capability Assessment Scheme* 2012).

Opinion

2. Item 2.4.3 – *Key values and risks*

   While ever we disagree on the land class rating we will have a different understanding of the capability of this land. For more than 30 years now, this site has been intensively managed as it is today. If the land was not capable of sustaining such management, we would observe clear evidence by now. To say the land has only "moderate to moderately low land capability", I believe, is erroneous.

   Whilst I was not invited to attend the actual soil sampling / assessing of the site when it was conducted, one wonders why the south-western quarter (figure 6-28) of the property has no data reported. Check sites were supposedly conducted, but nothing has been presented. It should be noted also that soil sampling site 1 is taken in nearly the lowest point on the whole site in the middle of the farm's main drainage line. From observations and analysis of neighbouring land adjacent to this south-western area, it may be that this is some of the best and well drained productive soil on the site. It may well have been classified a different land class, with different soil properties, had it been sampled/reported.

   I also challenge that the risks to erosion of such land is 'well understood and manageable with standard safeguards'. What is a 'standard safeguard' for erosion? My immediate response is use best practice technology and disturb it as little as possible. In the last 12 months, some areas of the Central West of NSW have had two or three "1 in a 100 year" events. The climate is clearly not "1 in a 100" anymore, and no-one can assume there is a safe period for land management. As 'land managers', we need to protect our soil assets with 100% cover, 100% of the time. By their own admission, 4% of the soil surface (1m in every 25m) will "require substantial levels of disturbance". That is "significant risk" and I am unaware of a "standard safeguard" to manage it.

3. Item 2.5.3 *Do nothing and opportunity costs*

   If one was to maintain the current 'status quo' of the proposed site, it remains a quality, productive, profitable and sustainable agricultural operation, as it has been for many years. There will always be opportunity costs of any project or decision considered, be it a change of farming enterprise, development, sub-division etc. As land custodians, we wish those "costs" to be as small as can be managed.

   There will be far less profitable land (from an agricultural production basis as quoted from the gross margins in the EIS) within the Bathurst LGA than this site. I find it difficult to understand how the quoted 16 dry sheep equivalents (DSE)/ha production level in the gross margins equals 'low intensity agricultural activities that could be continued'. 16 DSE/ha in any grazing operation within the Bathurst LGA would be in the top 5% of any grazing land and is only possible on highly productive soils with very good land management.

As for potential rural residential development, from observed outcomes of other recent land sub-division, this activity has increased the number of 'land managers' and 'labour units' available, and in many cases increased the level of management over the original land area. From a soil health and environmental aspect, these new land managers have been able to implement new approaches with higher biodiversity values than were previously present. Such could occur here and further improve the proposed site.

4. Item 6.4.2 – *Existing environment; Land and soil capability*

"Noted that Classes 1-3 are considered important agricultural land and would typically not be considered appropriate for solar farm development without very strong justification".

Such a statement should stand in this case, with "desktop mapping sources" showing the **site** and **surrounding areas** contain **Class 3 land.** It is interesting to note that Figure 6-29 in the EIS, with data supported by soil surveys, is NOT supported by NSW Department of Planning, Industry and Environment's eSpade service.

The results from the Land and soil classification, and cited in the EIS, has strongly referred to 'Hazard 6 – Water logging' to downgrade this land to Class 4. Within this hazard category is the subjective assessment of how long (duration) waterlogging occurs, and how frequently it happens (figure 2 – Table 14, taken from *The land and soil assessment scheme - OEH*). For Class 4 to be determined, this infers the soil is waterlogged for at least 2 – 3 months at a time, approximately every 2 to 3 years. It would take 2 to 3 site visits each year to determine if such waterlogged conditions were still present at each respective visit to make such a classification. I am unaware of that procedure occurring.

Given the timing of the assessment, and the wetter than usual season experienced at that time, the resultant class rating, being purely subjective in this category, could easily have been assessed differently by others. If one assessed the land in November 2019, waterlogging durations of "0-0.25 months" or "0.25-2 months" could easily have been made, and Land class 2 or 3 would have been confirmed.

Table 14. LSC class for waterlogging hazard

Typical waterlogging duration (months)	Return period	Typical soil drainage*	LSC class**
0	every year	rapidly drained and well drained	1
0–0.25	every year	moderately well drained	2
0.25–2	every year	imperfectly drained	3
2–3	every 2 to 3 years	imperfectly drained	4
2–3	every year	imperfectly drained	5
>3	every year	poorly drained	6
Almost permanently	every year	very poorly drained	8

* NCST (2009, p.202–4)
** Based on slope position, climate and length of time soils are wet.

Figure 2 - Image from *The Land and Soil Capability Assessment Scheme* re Waterlogging Hazard (Source – *The Land and Soil Capability Assessment Scheme* 2012).

I am also aware of pictures taken 10 days after another extreme rainfall event, during the night of November 13th 2022. Rainfall records to 9am on the 14th November 2022 for the Bathurst Airport show 86.4 mm fell. These pictures clearly show some Class 1 land (with irrigation) with ponding/short term waterlogging, while pictures of the proposed site, on the same day, show no such water logging present. The site is obviously draining better than reported in the EIS.

Has the community been under the misconception of land class? No. It has been classified Class 2 and Class 3 land for many years by NSW Department of Planning, Industry and Environment (or its known predecessor), and still is on its eSpade service. Draft Inherent General Fertility does not represent the site today, nor that of the surrounding areas, but yes, was at a point in time some years ago. One doesn't conduct a 16 DSE/ha operation on low fertility! Given the past two years have been 'decile 9' rainfall years (in the top 10% of wettest years on record), to determine the site 'non BASL' on 'poor drainage and moderately low inherent fertility' is extreme. 90% of the site has < 10 degrees slope and is some of the most productive, arable land in the Bathurst LGA.

5. Item 6.4.2 – *Existing environment; Agriculture*

   I am unsure as to where the employment figures quoted in the EIS of 689 persons has come from, however I believe the number of employed persons in the three sectors of agriculture, forestry and fisheries will be far greater than this. I am of the belief that there is well in excess of 4000 rural entities within the Bathurst LGA alone. Each of these will have somebody 'managing' that rural land. Quite simply, it seems self-employed people in agriculture don't seem to count!

   With less than half (42%) of the land use in the Bathurst LGA being used for agriculture, and 95% of that being predominately grazing, areas for crop and fodder production are finite. Behrendt and Eppleston (2011) quote only 31% of the region is suitable for grazing with occasional cropping, and just 11.4% capable of maintaining regular cultivation. This site, with approximately 170 ha of arable land, is a significantly larger contributor to the crop and forage production area of the region when there is only 5% of total agricultural land available. They continue citing the district sheep enterprises have an average stocking rate of 3-5 DSE/ha, while cattle and mixed enterprises average 5-8 DSE/ha.

   Those numbers clearly highlight again just how productive the proposed site is to livestock production in the region, especially when contributing up to 16 DSE/ha from the forage crop production system currently in place.

6. Item 6.4.3 – *Potential impacts; Agricultural conflicts*

   The lack of noted agricultural conflicts to neighbouring land concerns me. One of only four conflicts noted refer to adjacent land. The current practices employed on many of the adjacent paddocks are of mixed farming nature, including grain and forage cropping, and improved pasture production. Much of this land is arable and class 2 and 3.

Water – there is commentary for the life of the project to remove the dams. Removing such will increase overland flows to neighbours land, highly likely to impact on whatever production system is being conducted. Further, increased water flows and intensity will likely cause greater erosional forces. With the erodibility factors already noted, this will not only increase erosion on the site as water concentrates into the natural water lines, but will then leave the site with greater velocity into neighbours land. There are claims the 'reduced' stocking will lead to greater infiltration of water on the site. One cannot claim poor drainage and waterlogging for the benefit of land classification and then allude to greater infiltration as a benefit on the same ground! Shading by solar panels will limit plant growth at times of the day/month/year and grazing on lesser covered and drier soil will increase compaction. Both of these attributes may well lead to increased surface run off in contrast to the claimed 'increased infiltration'.

Soil erosion and consequences – During construction there will be "significant disturbance" of the soils. This in itself is a significant risk. Should an intense rainfall event occur at any stage while soil is being disturbed, erosion is likely. The soil analysis identifies if sodicity is present in the layers that were analysed. However, analysis of all depths was not conducted, which means identifying where the sodic layers commence is not possible. Yes, it does appear to start in the A2 horizon, but at what depth does this A2 horizon start. The analysis doesn't report the 10-20cm zone. Some of the 20-30cm layers contains sodic soils (> 6% sodium – actual levels 8% and better) which gets quite significant with depth in the 65-75cm layer. Here, sodium levels are up to 17%.

With trenches proposed to be dug to 1m, this is 33% deeper than any depth there is physical and chemical data reported for. Not knowing what soil properties exist in the full depth of trenching is, quite frankly, beyond belief. Is this next depth, 75-100cm even more sodic and unstable than what is above it and reported, who knows. What we do know is sodicity in most soils generally increases with depth, as the sodium ion is mobile in the soil and keeps moving further down the soil profile over time. Is the environmental risk of disturbing this deeper layer even greater again?

Gypsum is a known ameliorant of sodic soils and its' proposed use at significant rates is noted. How gypsum 'works' is by the calcium ion (Ca^{++}), on wetting of the gypsum, dissolving into solution. Ca^{++} then outcompetes the sodium ion (Na^{+}) for a 'place' on the clay complex and attaches in sodium's place. This leaves Na^{+} in solution which now moves wherever the water moves.

Again, given the reported waterlogging and poor drainage attributes of the site, this sodium, remains in solution. Where it end ups is where ever the water goes, ie into the neighbours!! Longer term and over the life of the proposed project, it is most likely to gradually increase the sodicity of the surface soils of the adjacent paddocks owned by neighbours. Does increased sodicity cause production losses and other degradation of soils, yes. Neighbours will inevitably be disadvantaged by rising sodicity issues of their soils whilst ever there are elevated Na^{+} ions in solution of the water that leaves the proposed site.

As a ‘safeguard’ to any of the above occurring, soil layers would need to be measured and isolated according to their sodicity content during excavation, and then replaced to the same depth as the trenches are filled. No amount of ‘dispersive’ and erodible soil can remain on the surface as this will just become an erosion point of the future, and a source of Na+ ions.

Weeds – An ongoing issue of any agricultural enterprise is weed management. At this point in time, I am of the understanding that weed management of the site is conducted chemically, by broadacre boom spraying. Such will not be possible for the future under a solar farm. So how will assurances be given to neighbours that weed control will be maintained? Weeds travel by wind, water, livestock, machinery etc. All these processes are likely to continue, and potentially some increase, and the flow of weeds will widen. Such a risk would add significant cost to a neighbouring business, both in time management to control such and the physical expense to do it.

7. Item 6.4.3 – *Potential impacts; Agricultural productivity and value*

Much of my opinion/concern in this section has been covered above. That said, some new material appears that requires comment.

Access roads, external and internal and hardstand areas – despite the obvious compaction in such zones, will the resulting roads/infrastructure impact and/or change the direction of natural water flows? It will increase run-off from those areas.

The ‘trenching’ remains a major erosional hazard. At construction and decommissioning, any disturbance of a sodic layer is likely to cause an issue. Why disturb such a sodic and dispersive layer, profess to address the situation via the ameliorant gypsum, and potentially shift the sodicity issue onto neighbouring agricultural land. It will reduce soil stability.

Some of the proposed benefits during operation may in fact be detrimental. Perennial grasses do not just appear. They would need to be established via a seeding activity. If perennials are not established, annual plants will dominate and by their nature, start and finish life annually. As such, there are times when ground cover will be very limited in an annual system, especially if grazing management has been used to control total dry mater (DM) as a fire control strategy.

Increases in soil moisture and infiltration is the last thing wished for in a waterlogged prone area with poor drainage Class 4 soil. All that says is plants will potentially be exposed to greater waterlogging events for longer. That leads to plant death and less ground cover, greater soil erosion and environmental damage.

Without internal fencing, how are “controlled stocking rates” to be achieved? Being unable to control where stock graze and do not graze simply leads to overgrazing and compaction in their ‘desired’ area of the ‘paddock’. In the ‘ungrazed’ areas, plants progress through their lifecyle, become even less digestible and less attractive to eat, and grow excessive DM. Fire risk increases in areas with high DM levels.

References

8. State of NSW and Department of Planning, Industry and Environment (2022) ©. Raglan Soil Landscape - from espade.environment.nsw.gov.au

9. NSW Office of Environment and Heritage (2012). The Land and Soil Capability Assessment Scheme, Second Approximation. Sydney: NSW Office of Environment and Heritage.

10. Behrendt K. and Eppleston J. (2011). Proceedings of the 26th Annual Conference of The Grassland Society of NSW Inc.

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Document 16: D. Harbison Report Update 9.12.22

Peer Review – Elgin Energy EIS Submission 9th December 2022

Glanmire Action Group

C/- Jo Petch
264 Brewongle Lane
Glanmire, NSW 2795

Private and Confidential

D R Agriculture Pty Limited
As trustee for the D R H Agricultural Trust ABN: 51 068 260 644

2470 Mitchell Highway
Molong NSW 2866
Ph: 0408 820 467 / 02 6366 9118

Jo Petch
Secretary/Coordinator
Glanmire Action Group
264 Brewongle Lane,
Glanmire 2795

December 9th, 2022

Peer Review – Elgin Energy EIS Submission

Dear Jo,

The report attached summarises my review of relevant sections of the EIS, as submitted by Elgin Energy.

Should you wish for further clarification of any of the material presented, please do not hesitate to contact me.

Yours sincerely,

David Harbison
Director.

Peer Review Report – Elgin Energy EIS

I, David Harbison, of D R Agriculture Pty Ltd, 2470 Mitchell Highway, Molong, being an independent agronomist / agricultural advisor say;

1. I wish to have noted that my views in my previous reports, 16th November 2020 and 8th June 2022 have not changed, and remain supported by the NSW Department of Planning, Industry and Environment's eSpade service, 'Raglan Soil Landscape' (espade.environment.nsw.gov.au) who classify the soil and land capability as Class 2 and Class 3. Within the Raglan Soil Landscape document, it is noted for the Solodic soils (of which much of the proposed site has been classified as) that the 'erodibility' rating of the topsoil is "high" and of the subsoil is "moderate or high". As an advisor, that information guides me strongly as to how such a site should be managed; disturbed physically as little as possible and try at all cost not to expose the subsoil. Such exposure can easily transform Class 2 or Class 3 land into Class 5 land as shown in figure 1 (photograph 5a of the OEH document). With today's best management practices employed by the current operators of the proposed site, the use of "no-till", "direct drill" and "conservation farming" activities, along with rotational grazing of crops and pastures, it shows clear evidence of 'careful management' as suggested by OEH for Class 3 land. That is exactly what is occurring at the site with little or no land or environmental degradation evident.

Class 5 land



Photograph 5a. Drainage plain with highly concentrated run-on, sodic subsoils and gully erosion

F Townsend/OEH

Figure 1 - Image from *The Land and Soil Capability Assessment Scheme* of Class 5 land (source – *The Land and Soil Capability Assessment Scheme* 2012).

Opinion

2. Item 2.4.3 – *Key values and risks*

   While ever we disagree on the land class rating we will have a different understanding of the capability of this land. For more than 30 years now, this site has been intensively managed as it is today. If the land was not capable of sustaining such management, we would observe clear evidence by now. To say the land has only "moderate to moderately low land capability", I believe, is erroneous.

   Whilst I was not invited to attend the actual soil sampling / assessing of the site when it was conducted, one wonders why the south-western quarter (figure 6-28) of the property has no data reported. Check sites were supposedly conducted, but nothing has been presented. It should be noted also that soil sampling site 1 is taken in nearly the lowest point on the whole site in the middle of the farm's main drainage line. From observations and analysis of neighbouring land adjacent to this south-western area, it may be that this is some of the best and well drained productive soil on the site. It may well have been classified a different land class, with different soil properties, had it been sampled/reported.

   I also challenge that the risks to erosion of such land is 'well understood and manageable with standard safeguards'. What is a 'standard safeguard' for erosion? My immediate response is use best practice technology and disturb it as little as possible. In the last 12 months, some areas of the Central West of NSW have had two or three "1 in a 100 year" events. The climate is clearly not "1 in a 100" anymore, and no-one can assume there is a safe period for land management. As 'land managers', we need to protect our soil assets with 100% cover, 100% of the time. By their own admission, 4% of the soil surface (1m in every 25m) will "require substantial levels of disturbance". That is "significant risk" and I am unaware of a "standard safeguard" to manage it.

3. Item 2.5.3 *Do nothing and opportunity costs*

   If one was to maintain the current 'status quo' of the proposed site, it remains a quality, productive, profitable and sustainable agricultural operation, as it has been for many years. There will always be opportunity costs of any project or decision considered, be it a change of farming enterprise, development, sub-division etc. As land custodians, we wish those "costs" to be as small as can be managed.

   There will be far less profitable land (from an agricultural production basis as quoted from the gross margins in the EIS) within the Bathurst LGA than this site. I find it difficult to understand how the quoted 16 dry sheep equivalents (DSE)/ha production level in the gross margins equals 'low intensity agricultural activities that could be continued'. 16 DSE/ha in any grazing operation within the Bathurst LGA would be in the top 5% of any grazing land and is only possible on highly productive soils with very good land management.

As for potential rural residential development, from observed outcomes of other recent land sub-division, this activity has increased the number of 'land managers' and 'labour units' available, and in many cases increased the level of management over the original land area. From a soil health and environmental aspect, these new land managers have been able to implement new approaches with higher biodiversity values than were previously present. Such could occur here and further improve the proposed site.

4. Item 6.4.2 – *Existing environment; Land and soil capability*

"Noted that Classes 1-3 are considered important agricultural land and would typically not be considered appropriate for solar farm development without very strong justification".

Such a statement should stand in this case, with "desktop mapping sources" showing the **site** and **surrounding areas** contain **Class 3 land.** It is interesting to note that Figure 6-29 in the EIS, with data supported by soil surveys, is NOT supported by NSW Department of Planning, Industry and Environment's eSpade service.

The results from the Land and soil classification, and cited in the EIS, has strongly referred to 'Hazard 6 – Water logging' to downgrade this land to Class 4. Within this hazard category is the subjective assessment of how long (duration) waterlogging occurs, and how frequently it happens (figure 2 – Table 14, taken from *The land and soil assessment scheme - OEH*). For Class 4 to be determined, this infers the soil is waterlogged for at least 2 – 3 months at a time, approximately every 2 to 3 years. It would take 2 to 3 site visits each year to determine if such waterlogged conditions were still present at each respective visit to make such a classification. I am unaware of that procedure occurring.

Given the timing of the assessment, and the wetter than usual season experienced at that time, the resultant class rating, being purely subjective in this category, could easily have been assessed differently by others. If one assessed the land in November 2019, waterlogging durations of "0-0.25 months" or "0.25-2 months" could easily have been made, and Land class 2 or 3 would have been confirmed.

Table 14. LSC class for waterlogging hazard

Typical waterlogging duration (months)	Return period	Typical soil drainage*	LSC class**
0	every year	rapidly drained and well drained	1
0–0.25	every year	moderately well drained	2
0.25–2	every year	imperfectly drained	3
2–3	every 2 to 3 years	imperfectly drained	4
2–3	every year	imperfectly drained	5
>3	every year	poorly drained	6
Almost permanently	every year	very poorly drained	8

* NCST (2009, p.202–4)
** Based on slope position, climate and length of time soils are wet.

Figure 2 - Image from *The Land and Soil Capability Assessment Scheme* re Waterlogging Hazard (Source – *The Land and Soil Capability Assessment Scheme* 2012).

I am also aware of pictures taken 10 days after another extreme rainfall event, during the night of November 13th 2022. Rainfall records to 9am on the 14th November 2022 for the Bathurst Airport show 86.4 mm fell. These pictures clearly show some Class 1 land (with irrigation) with ponding/short term waterlogging, while pictures of the proposed site, on the same day, show no such water logging present. The site is obviously draining better than reported in the EIS.

Has the community been under the misconception of land class? No. It has been classified Class 2 and Class 3 land for many years by NSW Department of Planning, Industry and Environment (or its known predecessor), and still is on its eSpade service. Draft Inherent General Fertility does not represent the site today, nor that of the surrounding areas, but yes, was at a point in time some years ago. One doesn't conduct a 16 DSE/ha operation on low fertility! Given the past two years have been 'decile 9' rainfall years (in the top 10% of wettest years on record), to determine the site 'non BASL' on 'poor drainage and moderately low inherent fertility' is extreme. 90% of the site has < 10 degrees slope and is some of the most productive, arable land in the Bathurst LGA.

5. Item 6.4.2 – *Existing environment; Agriculture*

   I am unsure as to where the employment figures quoted in the EIS of 689 persons has come from, however I believe the number of employed persons in the three sectors of agriculture, forestry and fisheries will be far greater than this. I am of the belief that there is well in excess of 4000 rural entities within the Bathurst LGA alone. Each of these will have somebody 'managing' that rural land. Quite simply, it seems self-employed people in agriculture don't seem to count!

   With less than half (42%) of the land use in the Bathurst LGA being used for agriculture, and 95% of that being predominately grazing, areas for crop and fodder production are finite. Behrendt and Eppleston (2011) quote only 31% of the region is suitable for grazing with occasional cropping, and just 11.4% capable of maintaining regular cultivation. This site, with approximately 170 ha of arable land, is a significantly larger contributor to the crop and forage production area of the region when there is only 5% of total agricultural land available. They continue citing the district sheep enterprises have an average stocking rate of 3-5 DSE/ha, while cattle and mixed enterprises average 5-8 DSE/ha.

   Those numbers clearly highlight again just how productive the proposed site is to livestock production in the region, especially when contributing up to 16 DSE/ha from the forage crop production system currently in place.

6. Item 6.4.3 – *Potential impacts; Agricultural conflicts*

   The lack of noted agricultural conflicts to neighbouring land concerns me. One of only four conflicts noted refer to adjacent land. The current practices employed on many of the adjacent paddocks are of mixed farming nature, including grain and forage cropping, and improved pasture production. Much of this land is arable and class 2 and 3.

Water – there is commentary for the life of the project to remove the dams. Removing such will increase overland flows to neighbours land, highly likely to impact on whatever production system is being conducted. Further, increased water flows and intensity will likely cause greater erosional forces. With the erodibility factors already noted, this will not only increase erosion on the site as water concentrates into the natural water lines, but will then leave the site with greater velocity into neighbours land. There are claims the 'reduced' stocking will lead to greater infiltration of water on the site. One cannot claim poor drainage and waterlogging for the benefit of land classification and then allude to greater infiltration as a benefit on the same ground! Shading by solar panels will limit plant growth at times of the day/month/year and grazing on lesser covered and drier soil will increase compaction. Both of these attributes may well lead to increased surface run off in contrast to the claimed 'increased infiltration'.

Soil erosion and consequences – During construction there will be "significant disturbance" of the soils. This in itself is a significant risk. Should an intense rainfall event occur at any stage while soil is being disturbed, erosion is likely. The soil analysis identifies if sodicity is present in the layers that were analysed. However, analysis of all depths was not conducted, which means identifying where the sodic layers commence is not possible. Yes, it does appear to start in the A2 horizon, but at what depth does this A2 horizon start. The analysis doesn't report the 10-20cm zone. Some of the 20-30cm layers contains sodic soils (> 6% sodium – actual levels 8% and better) which gets quite significant with depth in the 65-75cm layer. Here, sodium levels are up to 17%.

With trenches proposed to be dug to 1m, this is 33% deeper than any depth there is physical and chemical data reported for. Not knowing what soil properties exist in the full depth of trenching is, quite frankly, beyond belief. Is this next depth, 75-100cm even more sodic and unstable than what is above it and reported, who knows. What we do know is sodicity in most soils generally increases with depth, as the sodium ion is mobile in the soil and keeps moving further down the soil profile over time. Is the environmental risk of disturbing this deeper layer even greater again?

Gypsum is a known ameliorant of sodic soils and its' proposed use at significant rates is noted. How gypsum 'works' is by the calcium ion (Ca^{++}), on wetting of the gypsum, dissolving into solution. Ca^{++} then outcompetes the sodium ion (Na^{+}) for a 'place' on the clay complex and attaches in sodium's place. This leaves Na^{+} in solution which now moves wherever the water moves.

Again, given the reported waterlogging and poor drainage attributes of the site, this sodium, remains in solution. Where it end ups is where ever the water goes, ie into the neighbours!! Longer term and over the life of the proposed project, it is most likely to gradually increase the sodicity of the surface soils of the adjacent paddocks owned by neighbours. Does increased sodicity cause production losses and other degradation of soils, yes. Neighbours will inevitably be disadvantaged by rising sodicity issues of their soils whilst ever there are elevated Na^{+} ions in solution of the water that leaves the proposed site.

As a ‘safeguard’ to any of the above occurring, soil layers would need to be measured and isolated according to their sodicity content during excavation, and then replaced to the same depth as the trenches are filled. No amount of ‘dispersive’ and erodible soil can remain on the surface as this will just become an erosion point of the future, and a source of Na+ ions.

Weeds – An ongoing issue of any agricultural enterprise is weed management. At this point in time, I am of the understanding that weed management of the site is conducted chemically, by broadacre boom spraying. Such will not be possible for the future under a solar farm. So how will assurances be given to neighbours that weed control will be maintained? Weeds travel by wind, water, livestock, machinery etc. All these processes are likely to continue, and potentially some increase, and the flow of weeds will widen. Such a risk would add significant cost to a neighbouring business, both in time management to control such and the physical expense to do it.

7. Item 6.4.3 – *Potential impacts; Agricultural productivity and value*

Much of my opinion/concern in this section has been covered above. That said, some new material appears that requires comment.

Access roads, external and internal and hardstand areas – despite the obvious compaction in such zones, will the resulting roads/infrastructure impact and/or change the direction of natural water flows? It will increase run-off from those areas.

The ‘trenching’ remains a major erosional hazard. At construction and decommissioning, any disturbance of a sodic layer is likely to cause an issue. Why disturb such a sodic and dispersive layer, profess to address the situation via the ameliorant gypsum, and potentially shift the sodicity issue onto neighbouring agricultural land. It will reduce soil stability.

Some of the proposed benefits during operation may in fact be detrimental. Perennial grasses do not just appear. They would need to be established via a seeding activity. If perennials are not established, annual plants will dominate and by their nature, start and finish life annually. As such, there are times when ground cover will be very limited in an annual system, especially if grazing management has been used to control total dry mater (DM) as a fire control strategy.

Increases in soil moisture and infiltration is the last thing wished for in a waterlogged prone area with poor drainage Class 4 soil. All that says is plants will potentially be exposed to greater waterlogging events for longer. That leads to plant death and less ground cover, greater soil erosion and environmental damage.

Without internal fencing, how are “controlled stocking rates” to be achieved? Being unable to control where stock graze and do not graze simply leads to overgrazing and compaction in their ‘desired’ area of the ‘paddock’. In the ‘ungrazed’ areas, plants progress through their lifecyle, become even less digestible and less attractive to eat, and grow excessive DM. Fire risk increases in areas with high DM levels.

References

8. State of NSW and Department of Planning, Industry and Environment (2022) ©. Raglan Soil Landscape - from espade.environment.nsw.gov.au

9. NSW Office of Environment and Heritage (2012). The Land and Soil Capability Assessment Scheme, Second Approximation. Sydney: NSW Office of Environment and Heritage.

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Document 17: Erika Dawson Bushfire Expert Report, 7 December

Our Ref.: 22101-L01_C

Glanmire Action Group
C/- Mr Jonty Boshier
Hennessy Dowd Lawyers
PO Box 697
Bathurst NSW 2795

13 December 2022

Dear Mr Boshier

GLANMIRE SOLAR FARM – OPINION ON BUSH FIRE IMPACTS

1. This opinion has been provided in response to an email request from Hennessy Dowd Lawyers in relation to the bushfire impacts on the proposed Glanmire Solar Farm State Significant Development Application (SSD-21208499) that is on public exhibition from 18 November 2022 to 15 December 2022.
2. This opinion is provided in response to the following specific questions:
    a. The prospect of fire commencing on a neighbouring rural property as described, and its potential for causing damage to the solar plant if permission is granted to install it on the rectangular block to which we have referred.
    b. The speed with which a fire travels or is capable of travelling through, for example a crop ready for harvest, and the speed with which the fire front can extend by the time it reaches the boundary of the proposed solar plant.
    c. The "spotting distance" of embers.
    d. The location from where such a fire can reasonably be feasible to control.
3. I have the following academic qualifications:
    a. Graduate Diploma in Bushfire Protection with Distinction (University of Western Sydney)
    b. Graduate Certificate in Development Planning (Curtin University of Technology)
    c. Graduate Diploma in Natural Resources (University of New England)
    d. Bachelor of Urban and Regional Planning with Honours (University of New England)
4. I am accredited:
    a. by the Fire Protection Association Australia (FPAA) under the Bushfire Planning and Design (BPAD) Scheme (BPAD36371) as a Level 3 Accredited Practitioner in New South Wales and Western Australia. The NSW Rural Fire Service (RFS) recognise this accreditation as "as a person who is qualified consultant in bush fire risk assessment" for the purposes of environmental planning legislation.
    b. By the Planning Institute of Australia (PIA) as a Registered Planner (NSW).
5. I have 22 years' experience working in the planning industry, with the most recent ten years also incorporating bushfire planning. My experience has been both working in the private sector for various consultancies as well as for local government and consulting for both local and state government.

6. I am currently a member of the DPE/RFS Working Group for Recommendation 27[1] from the NSW Bushfire Inquiry.

7. I have reviewed the Environmental Impact Statement prepared by NGH as publicly exhibited on the Major Projects Website[2]. It is understood the application seeks approval for construction, operation and decommissioning of a 60MW solar farm on Lot 141 DP 1144786 (the solar farm site).

8. I have viewed the solar farm site from surrounding public roads and adjoining private properties. This site inspection was carried out on Friday 2 December 2022.

9. Each Council, where a Bush Fire Risk Management Plan applies, is required by section 10.3 of the *Environmental Planning and Assessment Act 1979* (EP&A Act), to prepare a map that identifies bush fire prone land. This map is required to be certified by the Commissioner of the NSW Rural Fire Service (RFS) and is thence known as the "Bush Fire Prone Land Map" (BFPL Map) for the Council. Council is required to update the map at least every five (5) years.

10. The RFS has published the *Guide for Bush Fire Prone Land Mapping* [3] to assist Councils in preparing the BFPL Map. This guide was last updated in November 2015 and introduced a new Category 3 Vegetation which encompasses medium risk bush fire vegetation including *inter alia* grassland vegetation. Councils were provided with a three (3) year period (from the November 2015 publication) by the RFS to update their mapping to include the Category 3 Vegetation. Bathurst Regional Council has not amended its BFPL Map to include Category 3 Vegetation.

11. In my opinion the solar farm site and its surrounds should be classified as Category 3 Vegetation as it comprises grassland that is not maintained in a managed state (for the purposes of considering bushfire hazard) and cropping is observed as being intermittently carried out and cannot be reasonably excluded from being bush fire prone land on this basis.

12. The purpose of the BFPL Mapping is to provide a legislative trigger for consideration of bushfire as part of planning and building approval processes. For SSD applications, developments on mapped BFPL would ordinarily be referred to the RFS for input to the Planning Secretary's Environmental Assessment Requirements (SEARs).

13. A review of the SEARs issued for the project does not identify bushfire as a specific matter to be addressed, apart from in general consideration of risks and hazards "an assessment of potential hazards and risks including but not limited to bushfires, spontaneous ignition, electromagnetic fields…"[4]. No indication was given as to whether the RFS was consulted as part of the preparation of the SEARs.

14. A review of SEARs for other projects where the land has been mapped as BFPL have included more detailed consideration of bushfire such as "identify potential hazards and risks associated with bushfires / use of bushfire prone land including the risks that a solar farm would cause bush fire and demonstrate compliance with Planning for Bush Fire Protection 2019".

15. The absence of a site being mapped as bush fire prone on the BFPL Map does not obviate the consent authority from the need to consider bushfire risks and impacts either from or to a development. Section 4.15 of the EP&A Act necessitates the consideration of bushfire in relation to a proposed development where there is considered to be land comprising bushfire hazard.

16. Section 6.10 of the EIS[5] considers hazards and risks, including *inter alia* bush fire. A more detailed consideration of the impact of bushfire on the development has been provided in Section 6.10.4 of the EIS. This consideration was not based on a Bush Fire Assessment Report (BFAR) prepared in

[1] Recommendation 27 - That Government commit to shifting to a strategic approach to planning for bush fire, and develop a new NSW Bush Fire Policy similar to the NSW Flood Prone Land Policy in order to accommodate changing climate conditions and the increasing likelihood of catastrophic bush fire conditions; to build greater resilience into both existing and future communities; and to decrease costs associated with recovery and rebuilding.

[2] https://www.planningportal.nsw.gov.au/major-projects/projects/glanmire-solar-farm

[3] NSW Rural Fire Service (2015) *Guide for Bush Fire Prone Land Mapping Version 5b*, Granville NSW

[4] Planning Secretary's Environmental Assessment Requirements SSD-21208499, dated 23/9/2021, p. 4.

[5] NGH (2022) *Environmental Impact Statement: Glanmire Solar Farm*, Version 2 Final.

accordance with *Planning for Bush Fire Protection 2019* (PBP)[6] nor did the consideration document a specific site assessment of the bush fire attack level based on the Methodology outlined in Appendix 1 of PBP.

17. The bushfire consideration has not considered agricultural activities on adjacent lands as a potential bushfire hazard impacting the development.

18. The bushfire consideration has applied "blanket" bush fire protection measures (BFPM) to the development in the absence of consideration of a site-specific bush fire attack assessment based on a detailed site assessment. It has also not contemplated changes in impact through revegetation/ vegetative screening measures required to ameliorate other impacts of the development and thus proposed as part of the development.

19. In order for a fire to occur and sustain, it requires the presence of oxygen, heat and fuel. In terms of a bushfire, the behaviour of the bushfire is influenced by topography, fuel and weather. Thus, in order to be able to consider the impacts of a bushfire on a particular development and vice versa, it is imperative to understand the local context influencing the bushfire behaviour. Vegetation is the only component that can be managed in order to influence bushfire behaviour.

20. In terms of topography, a fire travels faster uphill compared to over flat terrain or downhill. This is due to the flames being able to reach the fuel ahead of the fire more easily as well as the radiant heat preheating the fuel in front of the fire. Typically, the rate of spread of the fire will double for every ten degrees increase in slope. Aspect can also influence fire behaviour with northern and western aspects of hills tending to be dryer due to greater solar exposure.

21. The fuel for a bushfire is vegetation. The type of vegetation, how it is arranged, its compactness and volume, and moisture content all affect how a bushfire behaves.

22. Fire weather considerations include precipitation (or absence of), temperature, relative humidity, and wind. Fire Danger Ratings (FDR) provide an indication of the consequences of a fire should one start[7] or how difficult it will be to suppress the fire. These FDRs are shown on roadside signs and updated daily to reflect the forecast rating and range from Moderate to Catastrophic[8].

23. Measures of bushfire behaviour include rate of spread, intensity, flame length, and radiant heat flux.

24. There are a number of different models that are utilised to determine bushfire behaviour. The vegetation type determines which models are used. This is because bushfires behave differently through different vegetation complexes.

25. The solar farm site and its surrounds are observed to predominately comprise grassland or crop vegetation with scattered trees. The characteristic that most influences the spread of fire in this type of vegetation is the continuity of the fuel bed. The vegetation height will have the greatest influence on flame height and fuel load on fire intensity[9].

26. Improved pastures have a higher fuel load than native grasses and consequentially result in a comparatively greater fire intensity[10].

27. The curing state of grass and crops influence the ability of a fire to spread and the fire's rate of spread[11]. Cheney & Sullivan (2008) state:

    "Once the landscape is more than 90% cured there is potential for widespread devastating grassfires. By this point there are few natural barriers, such as green creek lines and gullies to inhibit the spread of fire"[12].

[6] NSW Rural Fire Service (2019) *Planning for Bush Fire Protection: A guide for councils, planers, fire authorities and developers*, Granville NSW.
[7] NSW Rural Fire Service (nd) *Fire Danger Ratings*, https://www.rfs.nsw.gov.au/plan-and-prepare/fire-danger-ratings
[8] AFAC (nd) *Australian Fire Danger Rating System*, https://www.afac.com.au/initiative/afdrs/afdrs-overview/afdrs-design
[9] Cheney, P & Sullivan, A. 2008. Grassfires: Fuel, weather and fire behaviour. Second edition, CSIRO publishing, Collingwood Victoria.
[10] Cheney, P & Sullivan, A. 2008. Grassfires: Fuel, weather and fire behaviour. Second edition, CSIRO publishing, Collingwood Victoria.
[11] Cheney, P & Sullivan, A. 2008. Grassfires: Fuel, weather and fire behaviour. Second edition, CSIRO publishing, Collingwood Victoria
[12] ibid, p. 55.

28. Other hazards, such as flooding, have a much more certain likelihood of occurring when the weather produces certain conditions. Bushfire on the other hand is reliant upon an ignition source. Bushfires can also occur when the weather conditions are less extreme providing there is an ignition.

29. As the moisture content of fuels decreases the ability to ignite becomes easier. Grassy fuels are capable of being ignited by very small embers or hot particles when the moisture content is below 6%. In these conditions fires can then be ignited by activities that would otherwise not cause ignition, such as "glowing carbon particles from defective exhausts, hot metal sparks from clashing power line conductors, grinding operations and metal striking rock during the operation of slashers or bulldozers"[13].

30. Similarly, during crop harvesting, it is not uncommon for fires to occur through metal harvester components contacting with rocks or from the build-up of flammable organic dust within the harvesting machinery[14].

31. Spontaneous combustion of stored natural fuels, such as silage pits and wet baled hay, are also recognised as an important catalyst for fires[15].

32. The *Chifley Bush Fire Risk Management Plan 2020* identifies the main sources of bushfire ignition in the area are:

    a. Lightning activity (mainly associated with late spring and early summer);

    b. Illegal / careless burning activities by private land owners/occupiers;

    c. Most commonly in grasslands and forested areas adjacent to villages.

    d. Escaped fires from legal burning activities by private land owners/occupiers;

    e. Campfires;

    f. Farm Machinery[16].

33. The structure and composition of grasses also affects the ability for ignition. Upright grasses that have recently died with little surface material are less able to be ignited. Conversely material that has partially decomposed is more likely to ignite as embers can make good contact with the fuel[17].

34. Wind can both hinder and assist ignition. Items such as metal sparks will be cooled by wind and thus will hinder ignition. Ignition from embers, cigarette butts, and other glowing combustion sources will be aided by wind. Once ignition has occurred, wind increases the combustion rate of a fire and will result in the rapid development of a fire. Under windy conditions even small fires become difficult to extinguish[18].

35. The land immediately surrounding the solar farm site comprises unmanaged grassland, improved pastures and croplands. These vegetation types are a classifiable type of vegetation pursuant to Appendix 1 of PBP and as such are capable of carrying a bushfire.

36. The solar farm site and its surrounds are characterised by undulating terrain with the landscape generally sloping in a south and south westerly direction towards Saltwater Creek. Consequentially the land to the west of the solar farm site is largely downslope of the site. The land to the south of the solar farm site is partially upslope and downslope of the site. The land to the east of the solar farm site is generally upslope of the site.

37. The following table outlines the bushfire behaviour outputs for a grassland fire with differing slopes characteristic of the locality:

[13] ibid, p. 31.
[14] Miguel G. Cruz, Richard J. Hurley, Rachel Bessell and Andrew L. Sullivan. (2020), F*ire behaviour in wheat crops – effect of fuel structure on rate of fire spread* in 'International Journal of Wildland Fire' 2020, 29, 258–271.
[15] Cheney, P & Sullivan, A. 2008. Grassfires: Fuel, weather and fire behaviour. Second edition, CSIRO publishing, Collingwood Victoria.
[16] Chifley Bush Fire Management Committee (2020) Chifley Bush Fire Risk Management Plan, NSW RFS, Bathurst.
[17] Cheney, P & Sullivan, A. 2008. Grassfires: Fuel, weather and fire behaviour. Second edition, CSIRO publishing, Collingwood Victoria
[18] Ibid, p. 32

Table 1: Bushfire Attack Level Assessment Scenarios

Bushfire Behaviour Measure/Input	Scenario 1	Scenario 2	Scenario 3
Effective Slope	Flat	Downslope 3°	Downslope 5°
Site Slope	Flat	Downslope 3°	Downslope 5°
Asset Protection Zone (m)	10	10	10
Flame length (m)	7.94	8.8	9.43
Rate of spread (km/h)	14.3	17.59	20.19
Fire Intensity (kW/m)	44,330	54,525	62,594
Radiant Heat (kW/m^2)	26.19	28.5	30.13

Notes:

Calculated utilising AS3959 (2018) Method 2 Detailed Method, using standard AS3959 and PBP inputs.

38. From the point of ignition, a bushfire continues to develop/grow until it reaches its potential rate of spread (i.e. it is fully developed). The bushfire behaviour outputs as outlined above are based on a fully developed fire.

39. The time a bushfire takes to reach full development will depend on weather conditions. Unstable conditions that are often characteristic of summer weather including hot north westerly winds with frequent and substantial changes in direction will increase the bushfire rate of spread quickly and thus will have a short time period to reach potential maximum rate of spread. Conversely stable weather conditions will result in a much longer time to reach potential maximum rate of spread[19].

40. It is a very real prospect that a bushfire could ignite on surrounding land and travel to impact the solar farm site.

41. The *Chifley Bush Fire Risk Management Plan 2020* identifies that the prevailing weather conditions for the bushfire season (November to January) in the Bathurst Regional LGA are westerly wind patterns[20]. Therefore, it is more likely that during the bushfire season a bushfire would be likely to impact the solar farm site from the west.

42. Assuming a grass fire had reached its potential rate of spread, using the outputs in **Table 1**, it would move at a rate of 4 to 5 metres per second or cover a distance of 100m in 17 to 25 seconds.

43. The residence time of grass fires is between 5-15 seconds (depending on fuel load and compaction)[21]. Whilst grass fires burn hot, the short residence time means that the duration of exposure is lower than other forms of vegetation (e.g., forest fires have a residence time of in the vicinity of 120 seconds).

44. Whilst grass fires have a shorter residence time compared to other vegetation forms, direct attack on a grass fire can only be utilised up to a fire intensity of around 10,000kW/m[22]. As seen in **Table 1**, a fully developed grass fire is expected to have an intensity of 44,330kW/m to 62,594kW/m.

[19] Cheney, P & Sullivan, A. 2008. Grassfires: Fuel, weather and fire behaviour. Second edition, CSIRO publishing, Collingwood Victoria
[20] Chifley Bush Fire Management Committee (2020) Chifley Bush Fire Risk Management Plan, NSW RFS, Bathurst.
[21] Cheney, P & Sullivan, A. 2008. Grassfires: Fuel, weather and fire behaviour. Second edition, CSIRO publishing, Collingwood Victoria
[22] NSW Rural Fire Service
https://nswrfs.atlassian.net/wiki/spaces/TECHNICAL/pages/44502820/Fire+Danger+Index+FDI+and+Fire+Danger+Ratings+FDR

45. Therefore, in order for direct attack to be successful on a grass fire, it would need to occur shortly after ignition and well before full development. Cheney and Sullivan identify that "it is highly unlikely that the head fire will be stopped by any suppression tactics until it runs into a very substantial barrier"[23].

46. Cheney and Sullivan further identify that in order for the barrier, such as a road or firebreak, to be successful, sufficient resources must be available to control the spot fires beyond the break (i.e. in the solar farm) once the fire reaches the break. The break must also be of sufficient width in order for fire fighters to work safely outside of their vehicles and enable spot fires to be suppressed immediately[24].

47. The effectiveness of a firebreak will be lessened when grasses have large seed heads, such as *Phalaris* spp., which enable spotting ahead of the fire[25]. Whilst grassfires typically result in less spotting than fires in other vegetation formations, the amount and distance of spotting would depend on the types of vegetative material and weather conditions.

48. Cheney and Sullivan further identify that when wind speeds exceed 25km/h firebreaks are likely to be ineffective as the winds will blow burning debris along the ground[26].

49. **Plate 1** shows the probability of a firebreak holding, based on width of the fire break and the intensity of the fire. The left-hand scenario assumes no trees within 20m of the firebreak and the right-hand scenario having trees within 20m of the firebreak.

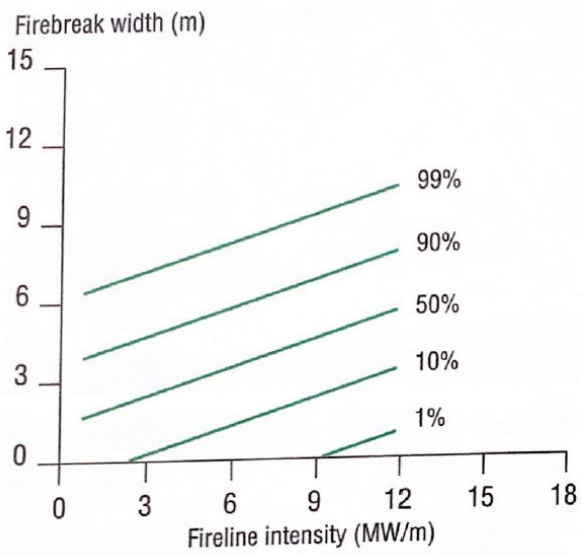


Figure 8.13: Probability of a firebreak holding a head fire in relation to fire intensity and firebreak width, where there are no trees within 20 m of the break. Source: After Wilson (1988).

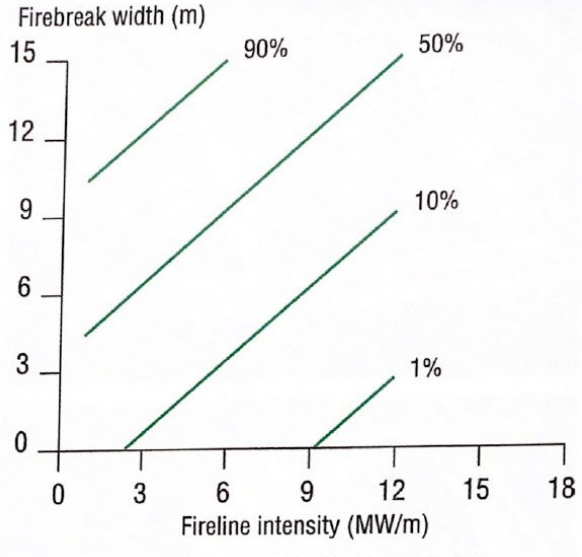


Figure 8.14: Probability of a firebreak holding a head fire in relation to fire intensity and firebreak width, where there are trees within 20 m of the break. Source: After Wilson (1988).

Plate 1: Probability of a firebreak holding under different scenarios[27]

50. The figures shown in **Plate 1** only include scenarios up to 12,000kW/m of intensity, whilst a fully developed fire would be likely to be three (3) to four (4) times that intensity.

[23] Cheney, P & Sullivan, A. 2008. Grassfires: Fuel, weather and fire behaviour. Second edition, CSIRO publishing, Collingwood Victoria, p. 96.
[24] Ibid p.97.
[25] Ibid.
[26] Ibid.
[27] Ibid p.103

51. **Plate 1** shows that a 10m wide fire break (i.e. the Asset Protection Zone (APZ)) with trees located within 20m of the fire break (i.e. the proposed visual screening) would have 20-30% chance of holding a head fire if the fire intensity was one third the intensity of a fully developed fire.

52. The Indicative Site Layout Plan for the proposed Solar Farm shows:

    a. A 10m wide landscape area will abut the western boundary of the site for more than half the length of the boundary, the southern boundary for approximately two thirds of the length of the boundary, and approximately half the length of the northern boundary of the solar farm site.

    b. A 5m wide landscape area will abut the balance of the western boundary of the site, the eastern boundary of the site and the balance of the northern boundary of the site (plus retention of an existing strip of vegetation).

    c. Two (2) watercourses within the site will be fenced off to provide waterway offset area (approximately 40m wide)

    d. The southern part of the site will be fenced off to retain existing scattered trees.

    e. An exclusion zone is to be provided in the northern part of the site and inside of the boundary screen planting. It is understood that will remain as grassland.

    f. An Asset Protection Zone (APZ) 10m wide is generally to be provided on the inside of the boundary screen planting or between the offset/riparian areas and the solar farm infrastructure. The majority of the APZ includes an access road, however, the central part of the western boundary does not and neither does the central riparian corridor.

53. The Landscape Concept Plan shows that the landscape planting, in the 5 and 10m landscape strips, riparian corridors and exclusion/pasture areas will provide significant revegetation and density of vegetation, in some areas introducing a vegetation likely to be consistent with forest classification.

54. This revegetation will introduce a very different bushfire risk to the site compared to the existing grassland vegetation. For example, whilst the rate of spread of the fire would be slower in a forest type vegetation compared to grassland, it would have significantly greater flame lengths, greater radiant heat, longer residence time, and increased chance of spotting. This different bushfire risk resulting from revegetation has not been considered in the assessment and the mitigation measure have not been provided to reflect the different bushfire behaviour.

55. The location of the APZ on the inside of landscape buffers will do little in the way of providing an effective APZ. The APZs will essentially be a narrow corridor between tall forest like vegetation and the solar panels. It will not provide a safe space for fire fighters to operate and will not provide a functional defendable space due to the narrowness and density of vegetation restricting views toward the approaching fire. Furthermore, many of the areas of the APZ do not have access provided.

56. Considering the scenarios in **Plate 1**, it not expected that the proposed APZ would provide for a suitable fire break in order to halt the spread of fire onto the Solar Farm Site nor to provide a suitable, tenable or safe environment in which to defend the Solar Farm site from, particularly given the length of these narrow APZ area.

57. In terms of access, it has not been demonstrated that the required passing bays (every 200m) and turnarounds can be achieved in order to comply with the PBP requirements.

58. The water supply proposed to be provided for firefighting purposes is the equivalent of that required to protect one (1) dwelling house. The solar farm site has a perimeter distance of over 6km and an area of nearly 200 hectares. The proposed water supply would be vastly insufficient to provide any meaningful protection of the site.

59. In the absence of a specific numerical guideline for water supply volume for solar farms in PBP, the recent Country Fire Service *Design Guidelines and Model Requirements: Renewable Energy Facilities*[28] could be utilised as a best practice guide, which requires:

    a. Generally for the solar farm one (1) x 45,000L static water tank for every 100 hectares of a site, plus,

    b. For the battery energy storage system protection, no less than 288,000L or as per the provisions for Open Yard Protection of AS 2419.1-2005 flowing for a period of no less than four hours at 20L/s, whichever is the greater, plus

    c. For the substation.

If you have any questions regarding this opinion, please contact the undersigned on 0400 940 482.

Yours sincerely

Erika Dawson
Director | BPAD Level 3 Accredited Practitioner (NSW & WA) | Registered Planner PIA

[28] Country Fire Authority (2022).
https://www.cfa.vic.gov.au/ArticleDocuments/550/220503_Design_Guidelines_Model_Requirements_Renewable_Energy_Facilities_v1.pdf.aspx

Document 18: Graham Swain Fire Report 5.12.2022

Australian Bushfire
Protection Planners Pty Ltd
ACN 083085474
Bushfire Mitigation Consultants

Hennessy Dowd Lawyers
191 Russell Street,
Bathurst,
NSW 2795

Attention: Jonty Boshier

Re:
Elgin Energy Pty Limited – Solar Proposal,
No. 4823 Great Western Highway, Glanmire.

Dear Jonty,
Thank you for the correspondence dated 29th November in which you seek a response to the following questions:

1. The prospect of fire commencing on a neighbouring rural property as described, and its potential for causing damage to the property upon which, if permission is granted, the solar plant will be installed.

2. The speed with which a fire travels or is capable of travelling through, for example a crop ready for harvest, and the speed with which the fire front can extend by the time it reaches the boundary of the proposed solar plant.

3. The "spotting distance" of embers.

4. The location from where such a fire can reasonably feasibly be contained.

5. Any other matter you consider as relevant as to risk.

Response to Question 1:

Fire has the potential to commence on the land surrounding the site on which approval is being sought to construct the Glanmire Solar Farm. Ignition sources include farm machinery, welding, cutting, grinding, vehicles, cigarettes and lightning.

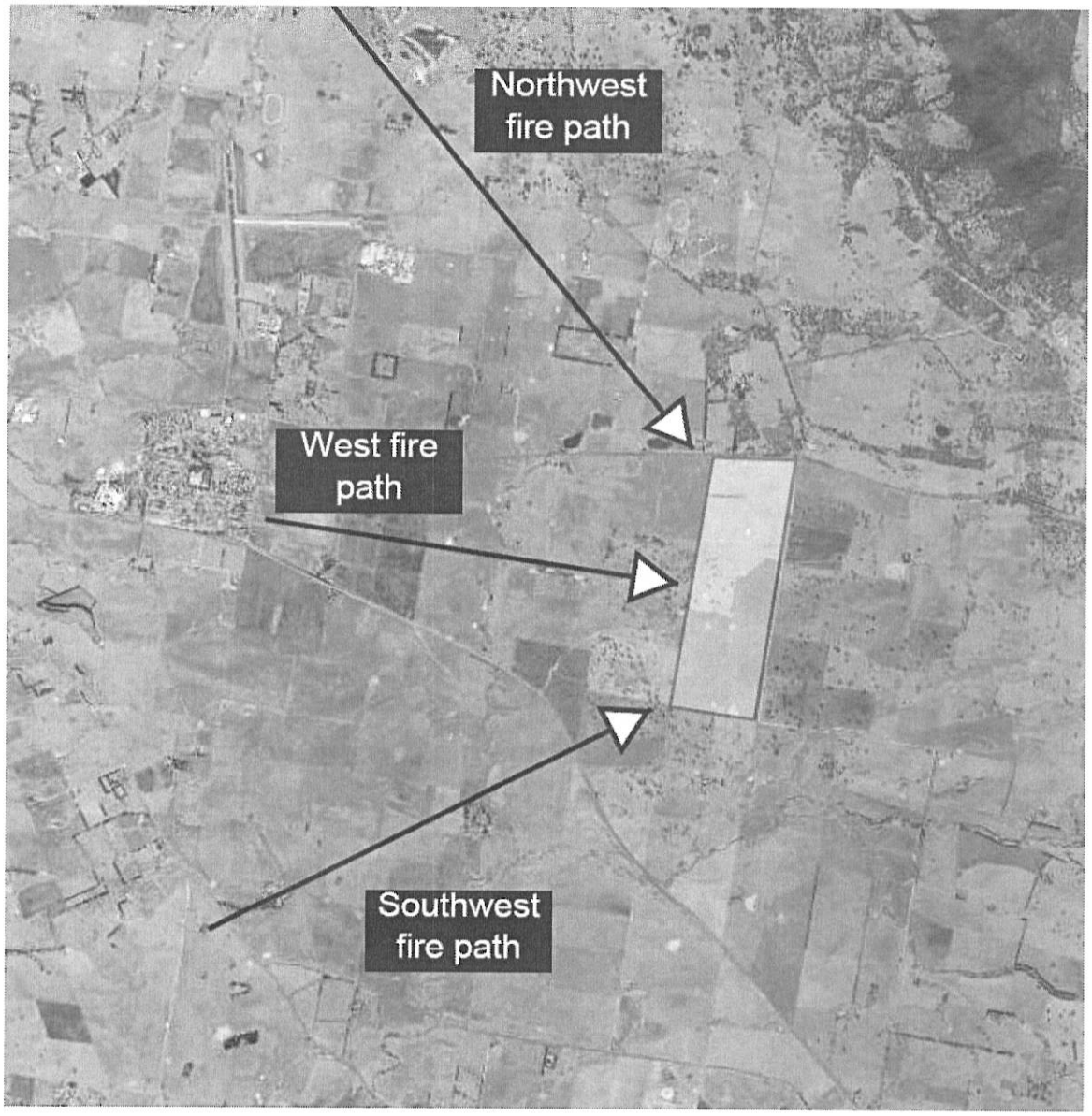
Catastrophic fire events can result in large scale bush/grassland fires (including standing crops) spreading across the landscape for many kilometres.

An example is the fire that started on a property on Sir Ivan Doherty Drive, Leadville, to the east of Dunedoo. This fire spread more than 50 kilometres under north-westerly and westerly towards Merriwa and Gulgong, causing significant property damage.

There is no reason that a similar fire event will not occur in the landscape surrounding the solar farm and cause damage to the solar arrays and associated equipment.

The predominant fire paths likely to impact the solar farm site is from the northwest, west and southwest – refer to Figure 1.

Figure 1 – Plan of potential fire paths likely to impact the Solar Farm site.



Response to Question 2:

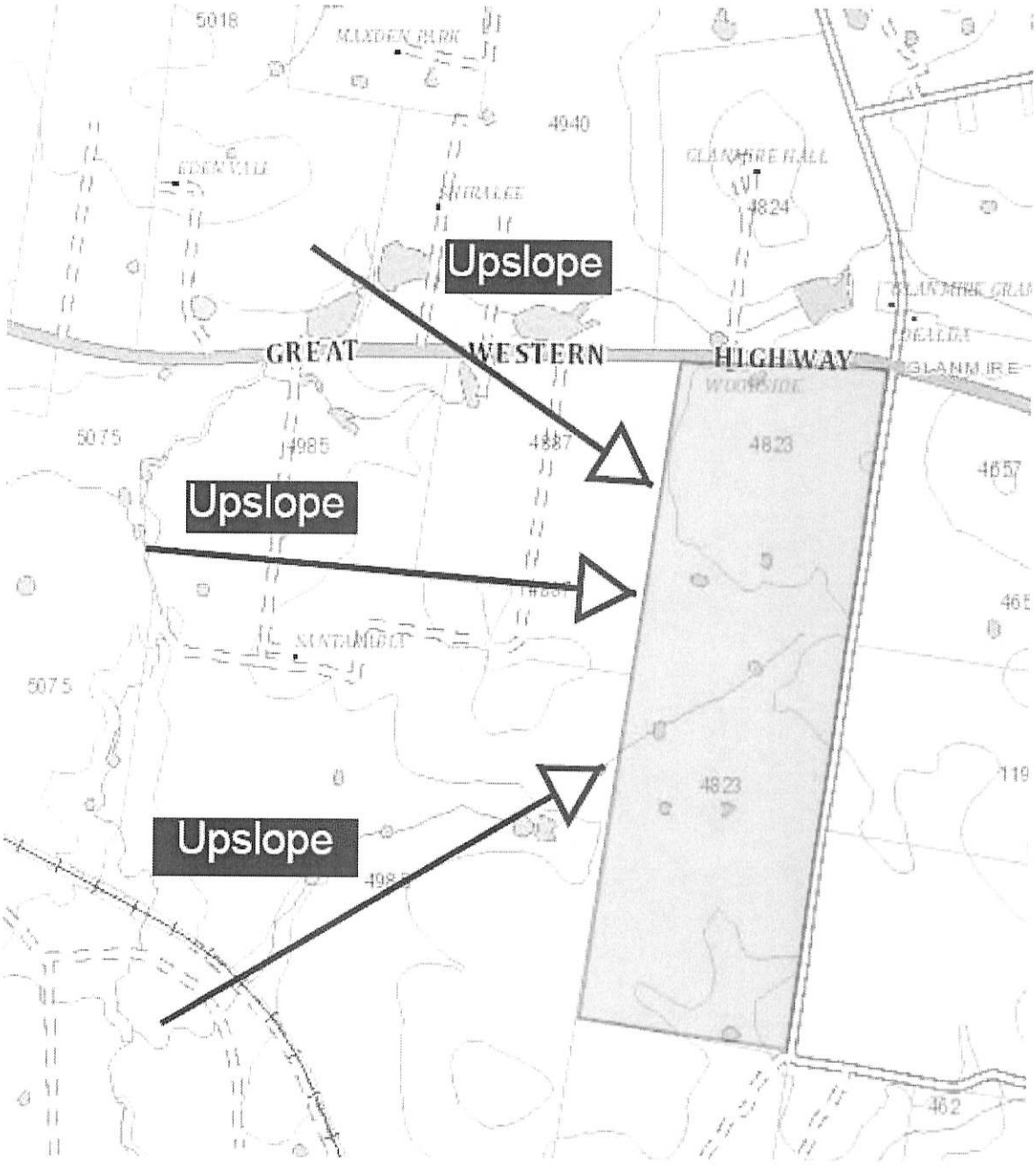
The speed at which fires spread is determined by the type of the structure of the fuels, topography of the land and the speed of the wind.

Fires that spread across open grass/crop land travel at a faster rate than fire that spread through forest vegetation.
This is because grassland/crops are open to the effects of wind whilst the forest structure is dense, reducing the speed of the wind through the denser vegetation.

The topography of the land also has an impact on the spread of fire. Over short distance the effect of slope is very pronounced.

The rate of forward spread will double up a 10 degrees slope.

Figure 2 – Plan of fire path gradients.



The predominant vegetation on the land to the northwest, west and southwest of the site is grassland/crops. The intensity of a fire and its difficulty of control is affected by the quantity of grass and the pasture. Heavy pastures burn faster and with a greater intensity than lighter pastures.

For grassland/crops at 70% cured and a temperature of 40 degrees Celsius with 10% humidity and a Fire Danger Index of 80 the rate of spread is calculated as 10.5 km/h.

The fire spread will be 170 hectares in 30 minutes, increasing to 1000 hectares in one hour, 4000 hectares in two hours. Flame height in average pasture vegetation is 6.0 metres and 11.0 metres for heavy pasture.

The perimeter of a grassfire increases by 2.5 times the forward spread of the fire i.e. if the forward spread is 10 km/h, the perimeter spread will be 25 km/h.

Response to Question 3:

The spotting distance ahead of a fire front depends on the structure of the vegetation (grassland/crops or forest), dryness off the vegetation, wind speed and flame height.

Grassland/crop fire produce fast moving, hot fires that give off burning embers that can travel kilometres ahead of the fire front. The spotting distance depends on wind speed.

Spot fires will penetrate the solar farm, igniting the grassland vegetation and equipment.

Response to Question 4:

A catastrophic fire event has the potential to 'out-run' fire-fighting efforts with reliance mainly being on aerial water bombing being the safest method of control.

The Sir Ivan's fire spread with the changing wind direction and burnt for many days, out-running fire crews.

A similar potential exists in the landscape surrounding the proposed solar farm with no defined point at which the fire can be controlled.

Response to Question 5:

The addition of the proposed planting along the boundary of the solar farm site, combined with the proposed screen planting on the solar farm site, will increase

level of radiant heat on the arrays and increase the risk of ember attack from burning bark and leaves.



Graham Swain
Managing Director,
Australian Bushfire Protection Planners Pty Limited.
05.12.2022

Graham Swain



Bushfire Planning & Protection Consultant 2020



Fire Control Officer, Wyong Shire NSW 1994

''Graham's assessments and mitigation measures put forward to protect against the impacts of bushfire have been undertaken, over 17 years with me, in a professional manner and with the full cooperation and support of the ACT Emergency Services Agency, the Fire Management Unit of EPSDD, the Suburban Land Management Agency. He is dedicated to understanding fire behaviour & applying lessons learnt & new research to the protection of life and property." ***Dave Richardson, Snr Development Director, Dept. of Planning, ACT Government.***

"I have worked extensively with Graham Swain on a wide variety of projects for over 20 years and emphatically recommend him as a leading bushfire expert in eastern Australia.
He is a very effective communicator and, when

Graham Swain is a deeply experienced, respected and skilled Australian bushfire planning professional collaborating with Australia's environmental leaders and planners to achieve the best people protection against fires in Australian building developments.

His career progression began with 20 years as an architect and commercial-residential builder being introduced to the bushfire sector by joining his local volunteer brigade on NSW Central Coast in 1975. His first professional bushfire role commenced in 1985 as Fire Control Officer for Wyong Shire and then briefly reporting to the NSW Commissioner in 1994-96 before transitioning into Bushfire Consulting employment and finally establishing his own company - Australian Bushfire Protection Planners Pty. Ltd. in 2004.

Graham has been responsible for managing over 10,000 incidents, 20 major bushfires and three emergency bushfires when he was Fire Control Officer, protecting 120,000 people on the NSW Central Coast.

He has experienced first-hand the responsibility of leading 14 brigades, 900 volunteers, equipment and supervising police, army and other support agencies during the 1994 emergency bushfires.

"Ahead *of his time"* reported by retired Commissioner Phil Koperberg, Graham developed an unprecedented volunteer Executive Brigade Management System that included a Senior Executive Group with ancillary groups covering Communications, Canteen, Welfare and Public Relations, Training.

He introduced an overlay paging system resulting in 24 hour 4 min brigade turnout time. He developed the current NSW RFS Label dress badge and the new name of 'Wyong Rural Fire Service (RFS)'. He also introduced the 2 piece bushfire fighting PPE, structural firefighting PPE for Wyong Rural Fire Service, unprecedented (within the RFS) full breathing apparatus capability for all Wyong brigades plus a GPS tracking of fire appliances in 1994 when the RFS has only just began roll-out of the same system 25 years later in 2019!

Graham was appointed by Commissioner Koperberg the Incident Controller for 3 bushfire emergencies in 1991-94 covering 800,000 hectares on the central coast and hinterland, including the Gunderman, Mogo Creek, Denman and Rylstone bushfires. He supervised the emergency management team including visiting CFA brigades, police, ambulance, NSW Fire Brigade, National Parks & Wildlife Service & Forestry, Central Coast Volunteer Rescue Squad and support agencies. He participated in aerial reconnaissance twice daily, on call 16 hrs /day for 15 days.

This resulted in preventing catastrophic fire impingement into the central coast

32 Old Dog Trap Rd Somersby NSW 2250 Tel. 612 43622112 / 612 43621184; Mob. 0427 622204
Email. abpp@bigpond.net.au

working on a team with him, I am always impressed by his depth of experience, general knowledge and his steadfast drive to provide the best possible consultancy advice for bushfire mitigation." ***Dr. David Robertson, Managing Director, Cumberland Ecology.***

"Graham is professional, knowledgeable, diligent and uncompromising on matters of bushfire safety and protection – he is recognised as a leader in the field." **Michael Staunton, Barrister, Martin Place Chambers**

"Graham's style is direct, practical and knowledgeable, and in my years with dealing with him, without peer." **Stephen Conroy, Surveyor, Springwood.**

A very dedicated professional who is steeped in his knowledge of planning for bushfire protection. **Stephanie Vatala, Lawyer**

"His huge experience in the field is unrivalled." **Azar Kassis, Builder Developer.**

with **nil injuries, deaths or loss of properties.**

Over the last 20 years Graham has been providing high-level advisory, reporting and attending Land & Environment Court as an expert witness for developments including schools, nursing homes, new residential suburbs and commercial areas, Solar and Wind Farms with projects covering NSW, ACT, Victoria, Western Australia and Queensland.

He liaises with government planners, ecologists, developers, architects, builders and lawyers. Graham has high-level expertise in delivering premium results to protect the lives of people from bushfires. He has developed an extensive level of cooperation with many professional consultants in the planning sector.

Graham is passionately motivated to make a difference in the protection of the Australian community from the impact of bushfires in the urban environment which is now being aggravated by changes in fire behaviour linked to climate change.

32 Old Dog Trap Rd Somersby NSW 2250 Tel. 612 43622112 / 612 43621184; Mob. 0427 622204
Email. abpp@bigpond.net.au

CURRICULUM VITAE

GRAHAM SWAIN

PRESENT POSITION

Managing Director, Australian Bushfire Protection Planners Pty. Limited.

QUALIFICATIONS

- Architectural Drafting Certificate - *Sydney Technical College*
- Licensed Builder/ Project Manager.
- Hazardous Materials Incidence Management - *Country Fire Authority, Victoria*
- Basic Rural Fire-fighter Course - *NSW Rural Fire Service*
- Crew Leader Course - *NSW Rural Fire Service*
- Regional Bushfire School - *NSW Rural Fire Service*
- Instructional Techniques Course - *NSW Rural Fire Service*
- 41A (Bushfire Emergency) Planning Course - *NSW Rural Fire Service*
- Hazard Analysis - *NSW Rural Fire Service*
- Crew Leader Course - *Australian Fire Protection Association*
- Instructional in Fire Protection for Fire Control Officers - *Australian Fire Protection Association*
- Disaster Management - *State Emergency Management*
- Local Emergency Management - *Australian Counter Disaster College*
- AIIMS Incident Management Course - *Australian Fire Authorities Council*
- Introduction to Critical Incident Debriefing - *Department of Community Services*
- O.H & S - *Workcover Authority of NSW*
- Accounts Management - *Housing Industry Association*
- Staff Management - *Housing Industry Association*

FIELDS OF BUSHFIRE EXPERTISE

- Bushfire Management and Suppression
- Bushfire Planning and Mitigation
- Bushfire Risk Assessment & Risk Management
- Bushfire Behaviour
- Fire control and Operational Management
- Evacuation Planning, Management &Training
- Assessment of risk to Life & Property from potential bushfire threat
- Assessment of design & construction of buildings
- Disaster Management
- Incident Control
- Hazardous Materials Management
- Occupational Health & Safety for Bushfire Fighters

32 Old Dog Trap Rd Somersby NSW 2250 Tel. 612 43622112 / 612 43621184; Mob. 0427 622204
Email. abpp@bigpond.net.au

FIRE FIGHTING/EMERGENCY MANAGEMENT POSITIONS HELD

• Deputy Regional Co-ordinator	- Department Bushfire Services
• Fire Control Officer	- Wyong Shire
• Primary Nominee	- Wyong Shire
• Executive Officer	- Wyong District Fire Committee
• Executive Officer	- Wyong Industrial Emergency Action Committee
• Training Officer	- Central Coast Petroleum Industry Response Group
• Member	- Wyong Local Emergency Management Committee
• Member	- Wyong Local Emergency Management Committee Rescue Sub-Committee
• Member	- Central Coast Disaster Recovery Committee
• Member	- Hunter Region Fire Committee
• Executive Officer	- Hunter Region Rural Fire Service Training Committee

- Department of Bushfire Services representative on the following Bushfire Committees: Lake Macquarie, Maitland, Port Stephens, Cessnock, Singleton, Muswellbrook, Scone, Rylstone, Great Lakes, Dungog, Gloucester, Taree & Hastings.

FIRE FIGHTING EXPERIENCE

Graham joined the Bays Bushfire Brigade, Gosford City, in 1974 and under-took training to become an active volunteer member and attended bushfire and other emergencies in the Gosford area. Appointed to the position of Captain of the brigade in 1977 and retained that position until 1985 when he was appointed to the full-time position of Fire Control Officer for the Wyong Shire until September 1994.

As Fire Control Officer, Graham managed fourteen brigades with approximately 1100 volunteer service members dealing with emergencies ranging from local bushfires, structure fires and road accidents, chemical spills to bushfire emergencies on the Central Coast and Hornsby.

Graham's involvement with the Bays Bush Fire Brigade provided operational management experience of fires in the local Bays area and other areas within Gosford City. His appointment as Fire Control Officer, Wyong Shire, in 1985 provided further experience in identifying bushfire hazards and risks, mitigation measures and fire management at a professional level.

In this role he provided Wyong Council with bush fire planning advice in the preparation of Local Environmental Plan & Development Control Plan documentation and individual development / building applications. Graham also represented Council on bushfire matters in the Land and Environment Court, with the first matter being heard in 1985.

Operationally, his term as Fire Control Officer allowed him to hone his fire fighting management skills dealing with bushfires in such diverse vegetation types as Hawkesbury Sandstone Dry Sclerophyll Forest to Coastal Heath, whilst becoming involved in emergency management at a broader scale. In December 1990 and October 1991 Wyong experienced major bush fires which resulted in the declaration of 41F Emergencies under the Bush Fires Act 1949 and Graham was appointed to the position of Emergency Controller during both emergencies.

32 Old Dog Trap Rd Somersby NSW 2250 Tel. 612 43622112 / 612 43621184; Mob. 0427 622204
Email. abpp@bigpond.net.au

During the January 1994 bushfire he was appointed Emergency Appointee (Incident Controller) for the fires in Wyong and the Deputy Appointee for the fires in Gosford City, in charge of local and interstate fire fighting resources combating fires on the Central Coast and within Cessnock Shire.

As Executive Officer of the Wyong District Bush Fire Management Committee he gained experience in the preparation of Local Emergency & Bushfire Management Plans.

Graham was a member of the Wyong Local Emergency Management Committee; member of the Wyong Local Emergency Management Committee Rescue Sub-Committee the Executive Officer of the Wyong Bushfire Management Committee; Executive Officer of the Wyong Industrial Emergency Action Committee; Training Officer – Central Coast Petroleum Industry Response Group; Member of the Central Coast Disaster Recovery Committee; Member of the Hunter Region Fire Committee and Executive Officer of the Hunter Regional Rural Fire Service Training Committee.

In September 1994 he commenced duties with the Department of Bushfire Services (Rural Fire Service) as Deputy Regional Co-ordinator, Hunter Region, responsible for the management of operations, emergency planning and training in the Hunter Region.

As Deputy Regional Co-ordinator with the Department of Bush Fire Services, Graham provided assistance to Local Governments in the preparation of 41A Emergency and Fuel Management Plans and Standards of Fire Cover.

FIRE PLANNING EXPERIENCE

Graham commenced providing bushfire protection advice on development proposals in 1985 in his position as Fire Control Officer, Wyong Shire and pioneered the introduction of the many construction standards that are relevant to present building construction.

He commenced private consulting in bushfire planning in April 2000 and has prepared bushfire protection assessments for subdivisions, special protection developments, and master plans, residential, industrial and commercial developments including the preparation of numerous bushfire evacuation plans.

Graham has prepared bushfire risk assessment reports for the Australian Capital Territory Government on the reconstruction of the rural villages of Stromlo, Pierces Creek and Uriarra, following their destruction during the January 2003 bushfires.

He has advised the ACT Government on the bushfire protection planning requirements for the ACT Emergency Services Headquarters and undertaken bushfire risk assessments for more than 42 new urban release areas in the Australian Capital Territory and was instrumental in the introduction of urban edge treatments for all new development in the territory.

Graham advised the Department of Defence in the preparation of the Fire Management Plan for Majura Field Firing Range (ACT) and works within Campbell Barracks, Perth (Western Australia).

Graham has extensive experience in the provision of advice on bushfire hazard and risk, fire behaviour, preparation of bushfire risk and Bushfire Attack Level (BAL) assessments, fuel management plans, fire management plans, evacuation plans local environment plans and development control plans.

EXPERT WITNESS EXPERIENCE

Graham's first involvement in providing assistance to the Court was in August 1985 when he was employed by Wyong Shire Council as Fire Control Officer for the Wyong Shire. Continuing involvement in the provision of expert advice occurred during the ten year period following the initial hearing in 1985 with more frequent appearances before the Court occurring since he commenced private consulting in 2000.

In the past eighteen years Graham has provided expert advice to the Court on more than fifty (50) occasions.

The following are some of those cases:

- Land & Environment Court Proceedings No 10416 of 2000, Landcom ats Sutherland Shire Council;
- Land & Environment Court Proceedings No 10269 of 2001, John Bourke ats Great Lakes Council;
- Land & Environment Court Proceedings No 40018 of 2001, Mrs. Susan Maul ats Liporoni and Anor;
- Land & Environment Court Proceedings No 10210 of 2002, Wyong Shire Council ats Filmtide Pty Limited;
- Land & Environment Court Proceedings No 10262 of 2002;
- Ku-ring-gai Council ats Masterbuilt Pty Ltd;
- Land & Environment Court Proceedings No 10634 of 2002, Ku-ring-gai Council ats M & R Civil;
- Land & Environment Court Proceedings No 10635 of 2002, Ku-ring-gai Council ats M & R Civil;
- Land & Environment Court Proceedings No 10636 of 2002, Ku-ring-gai Council ats M & R Civil;
- Land & Environment Court Proceedings No 10973 of 2002, Rosecorp Pty Ltd ats Ku-ring-gai Council;
- Land & Environment Court Proceedings No 10722 of 2002, Ku-ring-gai Council ats Flower & Samios;
- Land & Environment Court Proceedings No 10263 of 2003, Great Lakes Council ats DCR Property Consultants;
- Land & Environment Court Proceedings No 11353 of 2003, Cessnock Council ats Synergy Environmental Planning;
- Land & Environment Court Proceedings No 11260 of 2004, Ku-ring-gai Council ats Chella Holdings Pty Ltd;
- Land & Environment Court Proceedings No 11544-11548 of 2004, Avondale Properties Ltd ats Ku-ring-gai Council;
- Land & Environment Court Proceedings No. 11366 0f 2004, Kur-ring-gai Council ats Mark Shaynd;
- Land & Environment Court Proceedings No. 11626 of 2004 Providence Projects Pty Limited ats Gosford Council;
- Land & Environment Court Proceedings No. 10470 of 2005, Pepperwood Ridge Pty Ltd ats Newcastle City Council;
- Land & Environment Court Proceedings No. 11029 & 11030 of 2005, Ku-ring-gai Council ats Ray Fitzgibbon Architects Pty Ltd – Court Appointed Expert;
- Land & Environment Court Proceedings No. 10055 of 2005, CBD Prestige Property Holdings Pty Ltd ats Hornsby Shire Council;
- Land & Environment Court Proceedings No. 10059 of 2006, Pittwater Council ats Jenkins;

- Land & Environment Court Proceedings No. 10292 of 2006, Pittwater Council ats Ute Rossi;
- Land & Environment Court Proceedings No. 10222 of 2006, Waterview St Properties ats Gosford City Council – Court Appointed Expert;
- Land & Environment Court Proceedings No. 30826 of 2006, Langford & Jordon ats The Minister for Planning;
- Land & Environment Court Proceedings No. 10770 of 2006, Carr ats Lane Cove Council;
- Land & Environment Court Proceedings No. 31229 of 2006, Statewide Property Venture Pty Ltd ats Valuer General;
- Land & Environment Court Proceedings No. 31198 of 2006, Graham Trilby Pty Ltd ats Valuer General;
- Land & Environment Court Proceedings No. 31243 of 2006, Beach Court Pty Limited ats RTA;
- Land & Environment Court Proceedings No. 40480 of 2006, Olastand Pty Limited ats RTA;
- Land & Environment Court Proceedings No. 30502 of 2007, Beryl June Smith ats RTA;
- Land & Environment Court Proceedings No. 41114 of 2007, Cliff Viertal ats Rodney Andrews;
- Land & Environment Court Proceedings No. 10012 of 2007, Charly Tannous ats Port Stephens Shire Council;
- Land & Environment Court Proceedings No. 11243 of 2008, Ralph Douglas Williams ats Blue Mountains City Council;
- Land & Environment Court Proceedings No. 31077 of 2008, Diane Kay Hally ats The Minister Administering the EP&A Act;
- Land & Environment Court Proceedings No. 10700 of 2008, Pope Shenouda Coptic Christian Church ats Campbell City Council;
- Land & Environment Court Proceedings No. 30362 of 2010, Paul & Sandra Nicholls ats RTA;
- Land & Environment Court Proceedings No. 11049 of 2010, Eco Villages Australia Pty Ltd ats Pittwater Council;
- Land & Environment Court Proceedings No. 1070 of 2010, Luke Tappouras ats Lake Macquarie City Council;
- Land & Environment Court Proceedings No. 11053 of 2010, Trustees of The Sisters of the Good Samaritan ats Warringah Shire Council;
- Land & Environment Court Proceedings No. 10008 of 2011, Jonathan ats Kyogle Council;
- Land & Environment Court Proceedings of 2012, ARTZ 2 Design Pty Ltd ats Warringah Shire Council;
- Land & Environment Court Proceedings No. 10591 of 2014, Funforfour ats Ku-ring-gai Council;
- Land & Environment Court Proceedings No. 11113 of 2015, Fotios Monovasis ats Great Lakes Council;
- Land & Environment Court Proceedings No. 00151186 of 2016, Statewide Planning Pty Ltd ats Northern Beaches Council;
- Land & Environment Court Proceedings No. 310397 of 2016, Connie Saffioti ats Kiama Municipal Council;
- Land & Environment Court Proceedings No. 2017/00236706 of 2017, Dukor 24 Pty Ltd ats Northern Beaches Council;
- Land & Environment Court Proceedings No. 2018/00190765, Mehran Oboodi ats Hornsby Shire Council;
- Land & Environment Court Proceedings No. 2018/326045, Palm Lake Works Pty Ltd ats Ballina Shire Council;

- Land & Environment Court Proceedings No. 2018/00352721 Paul Unicomb ats Port Stephens Council;
- Land & Environment Court Proceedings No. 2019/00023960 Giuseppe Calarco Antonetta Calarco ats Liverpool City Council;

MEMBERSHIPS

Fire Protection Association Australia Member No: 48781

Document 19: Anthony Daintith Report 14.12.2022

ANTHONY DAINTITH
TOWN PLANNING

4 Isaac Drive, Orange
195 Russell Street, Bathurst
PO Box 1975
Orange NSW 2800
ABN: 46 121 454 153
Phone: 0408249700
Email: anthony@adtp.com.au

Our Ref: 2021-080

14 December 2022

Mr Peter Hennessy
Glanmire Action Group
C/- peter_hennessy@hotmail.com

Dear Peter

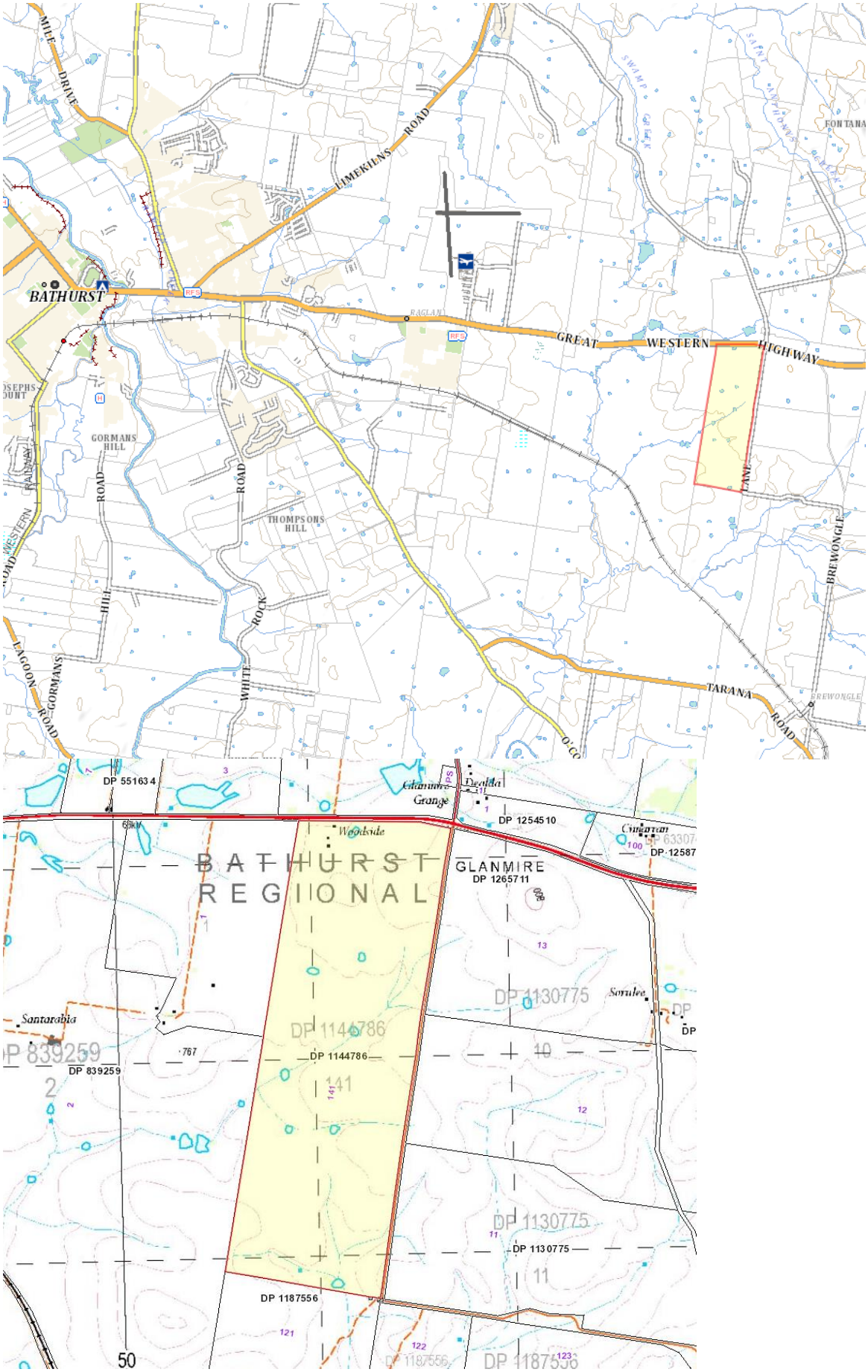
RE: PROPOSED SOLAR FARM (60 MW, ASSOCIATED INFRASTRUCTURE AND BATTERY STORAGE)
"WOODSIDE", 4823 GREAT WESTERN HIGHWAY, GLANMIRE
LOT 141 DP 1144786
STATE SIGNIFICANT DEVELOPMENT

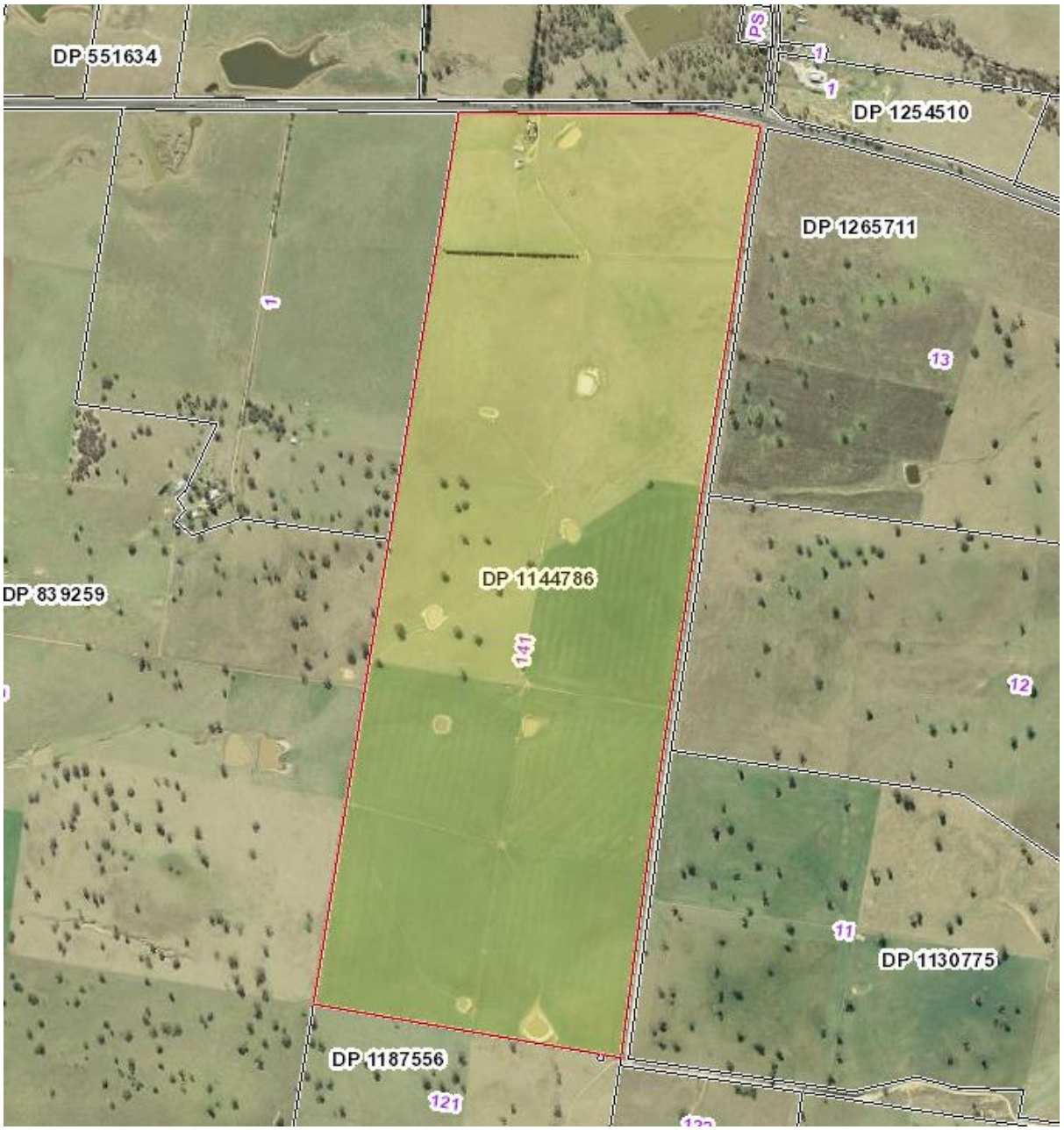
Reference is made to the solar farm proposed on the subject land at Brewongle by the development group "Elgin Energy". The proposed solar farm includes the installation of 60 MW (ac) solar farm on approximately 140 hectares of land. The subject land is located 11 km east of Bathurst and 4.5km east of Raglan.

"Woodside" consists of:

- The Woodside homestead and associated sheds & infrastructure that fronts onto the Great Western Highway (770m frontage).
- The subject land has a total area of 185.8ha.
- There is 2.4km frontage to Brewongle Lane.
- The land consists of Class 2 and 3 Agricultural Land.
- The land is generally cleared and is slightly undulating country.

Following are maps of the subject land.


BATHURST
LIMEKILNS ROAD
GREAT WESTERN HIGHWAY
RAGLAN
GORMANS HILL ROAD
THOMPSONS HILL
WHITE ROCK ROAD
TARANA ROAD
BREWONGLE
LANE
DP 551634
Glanmire Grange
Dredda
DP 1254510
Woodside
Cintaram
DP 12587
BATHURST REGIONAL
GLANMIRE
DP 1265711
DP 1130775
Sorulee
Santarabia
DP 839259
DP 1144786
DP 1187556
50


DP 551634
DP 1254510
DP 1265711
DP 1144786
DP 839259
DP 1130775
DP 1187556
PS
1
1
13
141
12
11
121

PROPOSED SOLAR FARM LOCATION

The following plans have been prepared with respect the proposed solar plant on the southern side of the Great Western Highway at Glanmire:

Figure 1 – Cadastral plan that indicates the location of the "Woodside" holding and the location of the proposed solar farm. The plan also includes the location of the existing dwellings within a 1km, 2km and 3km radius of the proposed solar farm.

Figure 2 – Provides a cadastral plan as indicated in Figure 1, but with an aerial photo overlay.

Figure 3 – Provides a cadastral plan as indicated in Figure 1, but with a topographical plan overlay

Figure 4 - Provides a cadastral plan as indicated in Figure 1, but with an Agricultural Suitability overlay

As depicted in the **Figures 1-4** as articulated above, there are approximately 57 dwellings within a 3km radius of the proposed solar farm. This is broken down as follows:

Distance from Solar Plant	Number of Dwellings
0-1km	6
1-2km	22
2-3km	29
Total	**57**

Because of the land topography of this proposed site (relatively level open country) the majority of the affected residences will have the 2.5m high fence and solar panels within view.

Bathurst Regional Local Environmental Plan 2014

The subject land is zoned RU1 Primary Production under the provisions of the *Bathurst Regional Local Environmental Plan 2014 (LEP)*. The minimum lot size under the LEP is 100ha.

The objectives of the RU1 Primary Production zone are:

- *To encourage sustainable **primary industry production** by maintaining and enhancing the natural resource base.*
- *To encourage diversity in primary industry enterprises and systems appropriate for the area.*
- *To minimise the fragmentation and alienation of resource lands.*

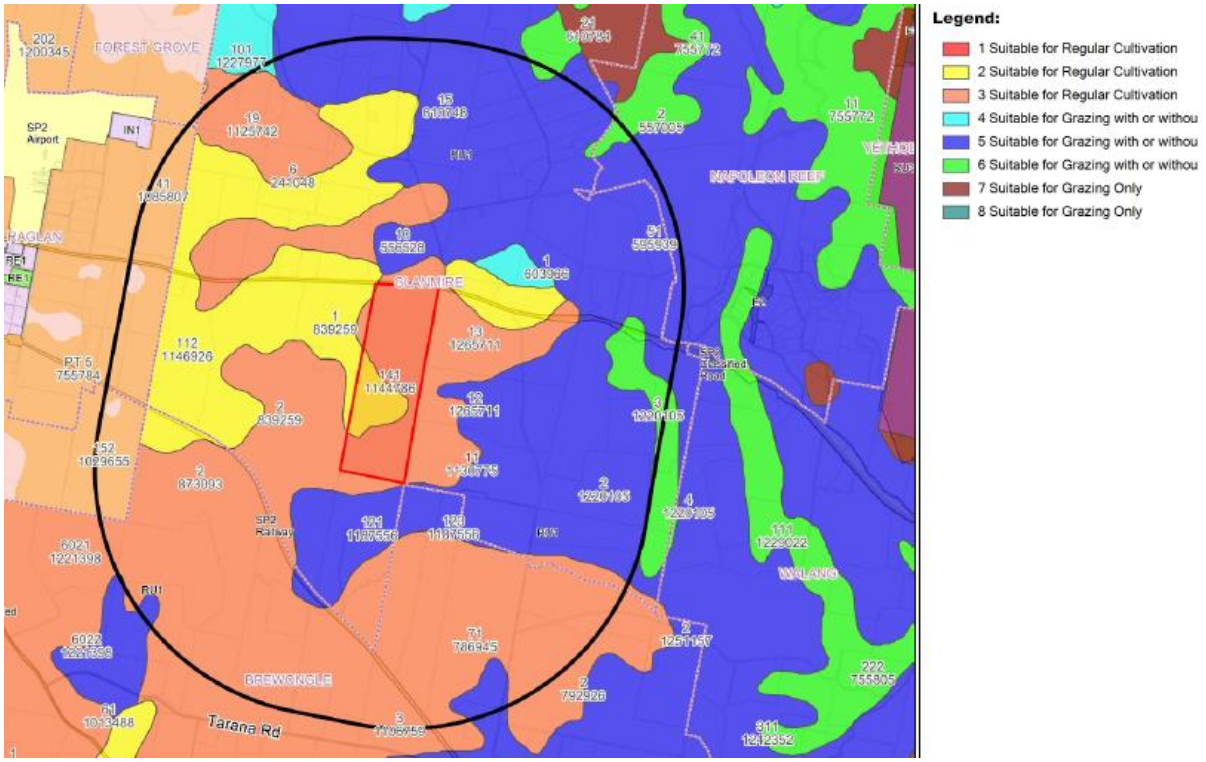
- *To **minimise conflict between land uses** within this zone and land uses within adjoining zones.*
- *To maintain the **rural and scenic character** of the land.*
- *To provide for a range of **compatible land uses that are in keeping with the rural character of the locality**, **do not unnecessarily convert rural land resources to non-agricultural land uses**, minimise impacts on the environmental qualities of the land and avoid land use conflicts.*

Based on an assessment of the objectives of the zone, it can be concluded that the proposed solar plant:

- Does not encourage sustainable primary industry production (there will be a loss of 140ha of prime "Class 2 & 3" agricultural land. The land has historically been cropped with a variety of grain crops along with grazing of livestock.
- Will lead to conflict between non compatible land uses.
- Is not a compatible land use that is in keeping with the rural and scenic character of the locality.
- It will unnecessarily convert rural land resources to non-agricultural land uses.
- The scenic quality to the "gateway" entrance to Bathurst will be negatively impacted by the construction of the solar farm. The entry is characterised by open farming land and then the Bathurst urban area with the famous Mount Panorama in the background that provides an ideal backdrop to the landscape that is synonymous with Bathurst.
- The picturesque and productive locality is very much part of Bathurst's beauty and heritage and deserves protection.
- The claim in the EIS that that there would actually be some improvement in the landscape character in the vicinity of the site due to the revegetation and planting of trees on the site is considered offensive to the large number of surrounding land owners.
- It will take a significant period of time for any landscape buffer to take any effect.

The minimum lot size under the LEP allows for a 100ha minimum lots in this area for the purpose of a dwelling house (subject to the lodgement of a development application). There has been a number of subdivisions approved in this locality and there is the potential for more (this will have the impact of increasing the number of residential receptors).

The proposed solar plant location is mapped **Class 2 & 3** land (refer to the map below), that been "Suitable for regular cultivation" – Class 2 & 3 land is considered to be "**Prime Agricultural Land**". Class 4 to Class 8 is considered to be "Non-Prime Agricultural Land". This further supports the non-compliance with the objectives of the RU1 Primary Production zone, in proposing a non-rural land use on prime agricultural land.



The EIS claims that 92% of the project site is class 4 land, based on the Land and Soil Capability ('LSC') Assessment Scheme. The remainder is class 5 based on a slope greater than 10%.

It is noted that the Land & Soil Capability Assessment was only completed by SLR in October 2022, well after substantial resources had been committed to the project by Elgin Energy. It is unclear why this aspect of the investigations was not undertaken at an earlier stage as part of the site selection when most of the subject land was nominally class 3 land according to broadscale mapping, and if (as stated in the EIS page 163) LSC classes 1–3 "are considered important agricultural land and would typically not be considered appropriate for solar farm development without very strong justification".

The SLR Land & Soil Capability Assessment ('SLR LSC assessment') concludes that the majority of the project land is class 4, and there is no class 3 land. Class 4 land is described by OEH (Office of Environment and Heritage ('OEH') 2012, The Land and Soil Capability Assessment Scheme (second approximation) – a General Land Evaluation System for New South Wales.) as being "only suitable for intermittent cultivation with specialised practices". This is not consistent with the actual land use of the project site which shows extensive regular cropping.

Conversely, class 3 land is "capable of sustaining cultivation on a rotational basis. This land can be readily used for a range of crops including cereals, oilseeds and pulses". This description exactly matches the past land use of the project site.

While the area of agricultural land taken up by the project is relatively small on a regional scale, the comparison of the project site to the Central West Orana Region on page 186 is inappropriate. This region extends from the Lithgow area in the eastern tablelands to the Bogan Shire in the western plains. Therefore, the comparison that the project site represents 0.0006% of the agricultural holdings within the Central West Orana Region is meaningless.

A more reasonable regional comparison would be to the Bathurst LGA, or to the central tablelands area. The project area is approximately 0.1% of the total agricultural land in the Bathurst LGA.

Visual impact

The scenic quality of the surrounding areas to be diminished to such an extent as to adversely affect land values (refer to separate reports from local Real Estate Agents).

It is glaringly obvious to any scenic observer that the proposed use of the land is totally incompatible with surrounds. It is a huge waste of excellent land and quite out of place.

Any landscaping would take many years to establish and create any form of acceptable barrier.

Economic Impact

The location of the proposed solar project will adversely impact the local community through a reduction of local employment and agricultural production. The suggestion this solar plant will positively impact the local economy is denied on the basis profits produced will not be spent/ distributed in the local economy but will be largely extracted out of the region by both the landlord and the tenant, as well as having an adverse impact on the rural community in the manner described.

The proposed solar project is proposed on a site of some 186 hectares, with a development footprint of 158ha and will take out of production 179.5 hectares of prime cultivation land.

In the course of producing crops, and or grazing while resting soils, the local economy is benefited. This includes the local purchase of grains, fertilisers, additives such as lime, and equipment. Ongoing expenditure includes the employment of local contractors for sowing, harvesting, cutting, and bailing. These benefits are enjoyed locally and annually.

Alternatives Sites

In section 2.5.1, the EIS states that "the project site was selected through a screening process based on generation capacity, connection capacity, desk top environmental due diligence studies, high-level ground truthing and landowner interest".

There is nothing in this section that indicates that alternative sites with less impact on agriculture and visual amenity were properly considered.

Several solar farms have been proposed in NSW for lower rainfall non-cropping sites with agricultural productivity 30 to 50 times lower than the Glanmire site(refer to Tremain Ivey Advisory report 12/12/2022).

The proposed solar farm on the southern side of the Great Western Highway on the proponent's property is sited entirely on prime agricultural land and in complete view of a large number of neighbouring properties. It is considered that the proposal is incompatible with the RU1 Primary Production provisions and objectives. This coupled with the potential heritage, air and road safety and water pollution concerns, the site identified for the future solar farm is far from ideal and the proponents should consider other more suitable locations.

Should you have any questions with respect to this matter, please contact the office on 0408249700.

Yours faithfully
Anthony Daintith Town Planning Pty Ltd



Anthony Daintith
Principal

Document 20: Michael Lund Initial Report 1.7.2021

PR MASTERS STEPHENS & CO PTY. LIMITED

AUCTIONEERS, LICENSED PROPERTY STOCK & BUSINESS AGENTS AND REAL ESTATE AGENTS
ABN: 26 112 218 443

BATHURST
121 Bentinck Street
PO Box 180
Bathurst NSW 2795
Phone: 02 6331 6266
Fax: 02 6332 1165

PR Masters Stephens & Co
Livestock & Property Agents

www.mastersstephens.com.au

BLAYNEY
101-103 Adelaide Street
PO Box 15
Blayney NSW 2799
Phone: 02 6368 2010
Fax: 02 6368 2162

To whom it may concern – Re: Solar Proposal at 4823 Great Western Highway, Glanmire

I Michael Lund am the sales manager for Masters Stephens Livestock and Property Agents for the Bathurst region. During my time in this role, I have conducted multiple sales in the affected area of Glanmire and Brewongle and feel that I have an intimate knowledge of the area's property value.

The area in question in part of what I refer to as the "Golden Triangle" that is bordered by Brewongle Lane, the Great Western Highway and the Tarana Road. In this area I have successfully sold no fewer than 10 parcels of land with aggressive capital growth shown on each occasion. It is an area that if put to market in its current condition would lead to district record prices.

The area in question is part of the treeless plains and with its rich soils, solid ground water and diversity for grazing and farming enterprises is a crown jewel of the Bathurst food basin.

I am aware that Elgin Energy has plans to erect solar panels over 186.1 hectares of land in the middle of this "Golden Triangle". I firmly believe that if this were to eventuate it would have a dramatic shift in the value of the surrounding land values and create an industrial environment over the area.

To consider this in some of the districts most valuable and rich farm land is curious to me when there would be many other more suitable sites on land that hold far less farming value.

In looking over the proposal from Elgin Energy, I believe that a simple commercial decision has been made to suit the developer whilst ignoring the major economic impacts it will have on the area as a whole.

The Central West (Orana) Renewable Energy Zone is the obvious preferred location for such a project. Alternatively, a location that has far less rural/social value and impact.

Kind Regards

Michael Lund
Sales Manager

1st July, 2021

Document 21: Michael Lund Second Report 8.12.2022

PR MASTERS STEPHENS & CO PTY. LIMITED

AUCTIONEERS, LICENSED PROPERTY STOCK & BUSINESS AGENTS AND REAL ESTATE AGENTS
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BATHURST
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Blayney NSW 2799
Phone: 02 6368 2010
Fax: 02 6368 2162

To whom it may concern – RE: Solar Proposal at 4823 Great Western Highway, Glanmire

I, Michael Lund of PR Master Stephens & Co, Licensed Real Estate Agent/ Manager have been asked to share my further views on the Solar Proposal at 4823 Great Western Highway, Glanmire.

By way of background, I have been a real estate investor for 20 years, and an agent for Master Stephens for approximately 13 years.

Master Stephens & Co is the oldest independent Stock and station agents in the area servicing all of NSW. We are considered experts in the trade of goods, stock and property. I am a Licensed real-estate agent (Australian College of Professionals), and an Auctioneer Stock and Station Agent.

My entire career has been based out of Bathurst.

I was asked to prepare a report in relation to this land in 2021. I prepared the report which is now attach to this report. I adhere to the contents of that report.

Time has gone by of course, between July 2021 and now, and in my experience, rural properties, particularly smaller rural properties, have escalated significantly in value, and in a setting where the broader community of real-estate agents are indicating a 'dip' in real estate. That has not been, and is not my experience, in the Bathurst area.

I have been referred to certain portions of the Environmental Impact Statement (EIS) dated November 2022, and I now refer to pages 188 – 189, and 233.

1. Elgin Energy suggests that there is no evidence that a solar project (such as the one proposed here), has an impact on the value of adjoining nearby rural properties. There is in my view, no point in debating that broad statement because I am confident it simply has no relevance to the proposal located at the proposed site.

2. Before 2014, there were several blocks created in this general area of size less than 100 hectares. As I understand, the Bathurst Regional Council set about endeavouring to strike a happy medium between the demand for smaller blocks and the need to preserve a green belt around Bathurst, and to preserve good productive land.

The end result was the Bathurst Regional Local Environment Plan 2014, and since that time, rural properties in the subject area are required to be 100 hectares or more. The fact is, that most rural landowners surrounding this block have in fact subdivided their blocks into 100 hectares, or thereabouts, and have either sold them off or are holding on to them. Each block of course, has a building entitlement.
Since 2014 I have seen several houses erected in the close vicinity of this block, all of high value, consistent with the high value of the rural property/ real estate that surrounds this block.

3. It is in my view, particularly having regard to the 100-hectare size, the location of the land, the fact it is on the perimeter of a growth city and the fact the land enjoys all of the qualities described in my earlier report, it is inappropriate to lump this in with broad acres.

4. In my view, a development such as that proposed will not only occupy two building blocks for the next 40 years, but will take out of production, land that enjoys all of the qualities that I refer to in my prior report, that is to say, high quality land.

5. I have viewed several photographs in the EIS including those on pages, 104, 115 - 116, 118 and 121, and my unhesitating opinion is that this proposal will have a serious detrimental impact upon the surrounding properties both in terms of value and in terms of production.

6. I am aware of the serious insurance issues imposed upon neighbours as a result of this proposal.

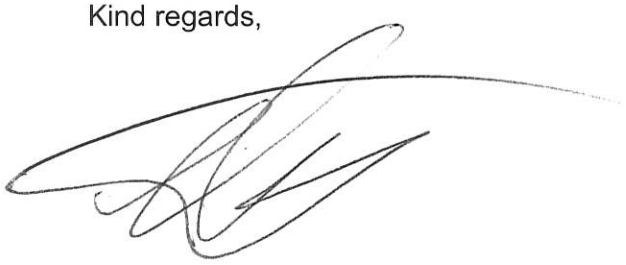
I refer to pages 162 to 164 of the EIS and I say the following: -

1. The description of this land as 4 and 5 is totally foreign to my impression of the land.

2. My knowledge of the productivity of this land, and of course the value of the land is as assessed by me and so many other agents and so many other purchasers over many years.

3. I adhere to the view that it is productive cultivation land.

Kind regards,



Michael Lund
Sales Manager

8 December 2022

Document 22: Andrew Bickford Initial Report 2.7.2021

Elders Rural Services Australia Limited
80 Grenfell Street
Adelaide, SA, Australia 5000
GPO Box 551, Adelaide SA 5001
p | 08 8425 4000 f | 08 8425 4627
elders.com.au

2 July, 2021

TO WHOM IT MAY CONCERN

RE: Proposed Solar Plant 4823 Great Western Highway at Glanmire NSW 2795

I, Andrew Bickford am the Branch Manager of the above mentioned company based at Bathurst.
In my role, I handle rural real estate sales in our local area of Bathurst and surrounding areas.

I have read the Elgin Energy brochure in the above mentioned proposal and the Glanmire Action Group brochure opposing it.

I am well familiar with the subject site and its surrounds.

Glanmire, in particular the subject site and surrounds, is a highly sort after locality. It is located on the eastern side of Bathurst. It combines well with surrounding areas such as Brewongle and O'Connell. It is in close proximity to Sydney and the City of Bathurst.

4823 Great Western Highway is at the gateway to Bathurst and the Central West.

The land is highly productive. It is grain producing country and such land is a precious commodity. It is of course also grazing land and frequently farmers combine the two operations. Importantly however the land that has the quality necessary to produce grain, is the land that is very much sort after by rural producers.

I have noted in particular in recent years, very high prices being paid for surrounding land, and then high quality improvements being undertaken in the form of rural infrastructure, including pastures and buildings etc, together with high quality homes.

Elgin Energy Pty Ltd is proposing to lease the area at the above mentioned location, and to install solar panels and other equipment on the property. In my view if this proposal is allowed to eventuate, it is likely to have a most significant negative impact on land prices in the surrounding area.

Yours sincerely,

Andrew Bickford

Branch Manager
Elders Rural Services Australia Limited Bathurst
Licensed Real Estate & Stock & Station Agent

Elders Rural Services Australia Limited ABN 72 004 045 121. Registered Office: 80 Grenfell Street, Adelaide SA Australia 5000

Document 23: Andrew Bickford Second Report 13.12.2022

Elders Rural Services
150 Russell Street
BATHURST NSW 2795
p | 0263317788
bathurst2@elders.com.au

13/12/2022
To Whom It may concern;

RE: Solar Proposal at 4823 Great Western Highway, Glanmire

I, Andrew Bickford, Branch Manager of Elders Rural Services have been asked to provide a further letter providing my professional opinion on the Elgin Energy Solar Proposal at 4823 Great Western Highway, Glanmire.

My qualification and practical experience include:-

- Stock and Station agent of 23 years, working in Yass, Glen Innes, Millicent (South Australia) and Bathurst (since 2005).
- Branch Manager of Elders Rural Services, Bathurst.
- Licenced Stock and Station agent, Real Estate agent (Licence no. 1081382).
- AuctionsPlus Assessor (Accreditation level 1 for cattle, lambs and sheep) (License no. 032031

On 2 July 2021 I prepared a report for the Glanmire Action Group. I reaffirm my views in that report.

I am very familiar with the subject site and its surrounding properties.

I am aware the Environmental Impact Statement (EIS) for the proposed solar farm is currently open for exhibition and response. I have since reviewed the material and been specifically referred to pages 162 – 164, 170, 189, and 234.

In relation to those pages, I make the following comments:

Land Quality and Value

- This land is located on the perimeter of the growing city of Bathurst and is of the highest quality, both in terms of its long-standing agricultural productivity, and its high residential value.

- Predating, and throughout the entirety of my career, I and professionals within the local and surrounding area have described this area of Bathurst as the "green triangle" - Bathurst's most highly regarded agricultural land.

- Recent residential developments have further increased the value and desirability of these properties.

- I disagree with Elgin Energy's claim that due to lack of data, "*it is not possible to make an evidence-based assessment about the impact of this Project on the property values of the surrounding properties*" (EIS page 189).

  Having regard to my 23 years of experience, familiarity with the area and the local property market, and having viewed the photographs described *as Figure 6-7, 6-8* and *6-9*, it is my professional opinion that the proposal will have a serious negative impact on the rural and scenic quality of the land and consequently, on the value of neighbouring properties.

- In my view it is inappropriate to take out of production prime agricultural land, which significantly contributes to the local economy through leaseholder arrangements, contractors, and local suppliers.

- At page 163 of the EIS, the land is described as class 4 and 5. This assessment is completely at odds with my knowledge and understanding of the quality and productivity of the land.

Elders Rural Services Australia Limited ABN 72 004 045 121. Registered Office: 80 Grenfell Street, Adelaide SA Australia 5000

- I consider this land prime cultivation land.

- I am aware of the significant insurance issue this proposal will impose on neighbours. I hold significant concerns about the impact to the area.

Agricultural Production in the Bathurst Economy

- At page 170 of the EIS, Elgin Energy claim "*Agriculture is not a major employer within the region: with the total of 689 person employed int agriculture, forestry and fisheries sector*", without commenting on the employment in the forestry and fisheries industries, I suggest this statistic minimises the role agriculture plays in the Bathurst economy and to employment more particularly.

- Elders Rural Services in Bathurst deals with over 200 clients in the local area and surrounds. Our business helps out with livestock sales, wool brokerage, farm insurance, real estate, farm supplies, agronomy and financial products.

- Our top 100 clients would employee numerous contractors and staff though out the year.

- Most farming operations in the area have employment in the following capacity:

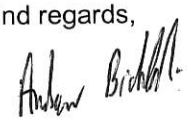
    - Family member running the farm with siblings;
    - Farm managers and jackaroos;
    - Farming contractors, to name a few duties, include:
        - Fencing, shearing, crutching, sheep drenching, sheep dipping, lamb marking, calf marking, pasture and weed spraying, fertilizer spreading, hay making , contract stock mustering.

- I consider it highly likely most farms would have 20 to 30 people on farm during the year. Out of our 200 clients it reasonable, and indeed a conservative estimate to say that 6000 people are employed or contracted onto these farms in our local area.

- There are another eight agents operating out of Bathurst with similar statistics to our business.

- It is very clear that agriculture in our area employs a large volume of people.

Kind regards,



Andrew Bickford
Branch Manager, Elders Rural Services Bathurst

Elders Rural Services Australia Limited ABN 72 004 045 121. Registered Office: 80 Grenfell Street, Adelaide SA Australia 5000

Document 24: P. Hennessy letter to DPE 9.06.2022

Peter & Denise Hennessy
"Adelong Park"
457 Brewongle Lane
GLANMIRE NSW 2795

Peter's Mobile No: 0414 375 565
Denise's Mobile No: 0418 444 429

9 June 2021

NSW Department of Planning Industry & Environment

Contact Planner: Lander Robinson

Dear Sir/Madam

Re: Application SSB.21208499
Elgin Energy Pty Limited – Solar Proposal at 4823 Great Western Highway, Glanmire 2795

I refer to my letter dated 4 June and to the applicant's "Scoping Report" dated June 2021 and recently posted on your website.

Since forwarding my letter I have had the opportunity of reading the "Scoping Report" and so am now writing to comment upon some portions of the report that are within my knowledge.

When writing this letter, I bear in mind your website advice– The Scoping Report must:

1

2

3 Summarise the results of any early community engagement

4 Identify the scale and nature of impact of the project;

5 Outline the proposed approach to assessment and community engagement."

The writer understands there have been recent changes to the planning process with a view to discouraging applications that lack merit thus hopefully avoiding unnecessary community anxiety, division and uncertainty that, for example, existed between 2017 – 2020 in Brewongle while Photon pursued its dubious proposal and then appeared to have tried in vain to flog it off to some alternative proponent before finally abandoning the site.

I suggest the applicant's Scoping Report does not in relation to the topics within my knowledge adequately address in particular the mandatory requirements itemised above and am concerned that that inadequacy might result in Elgin Energy Pty Limited's request for a DA succeeding rather than failing.

Before moving to the applicant's Scoping Report I want to outline a little about myself.
I was born and raised in Sydney. As a child I came with my parents to Brewongle and spent holidays on my mother's brother's farm. I liked the rural experience.

In time I qualified in law and was admitted as a barrister and while in practice and in 1979 I purchased "Adelong Park" at the above address. My rural interest and my family's rural interests intensified and so in subsequent years my wife Denise and I purchased adjoining land. At this point in time four of our five daughters and their husbands/partners are actively involved in rural activities. One family lives at 462 Brewongle Lane on their own property. The other three actively involved daughters reside in Sydney and a fifth daughter with her husband and their three sons are returning from the United Kingdom in January 2022 and propose to base themselves at Brewongle and participate in rural activities.

Between 1979 to date our family has planted many thousands of native trees, in particular, Eucalypts, practised conservation and created hundreds of acres of native corridors. Our property has been utilised for agricultural field days.

We have at Adelong Park a "hut". It is off-grid, solar powered and is let by Denise on Airbnb. We have rooftop solar on our residence. We are truly green.

For seven years now I have retired from mainstream legal practice but have done pro bono work. I assisted Brewongle residents' opposition to Photon's proposal at Brewongle and now am doing the same at Glanmire.

Experience has shown that these proposals are a huge imposition upon the community.
In 2017 I, with others, sought changes to the planning provisions and our requests included:

(a) The creation of areas where renewables were welcomed;

(b) The exclusion of the better land from proposed sites;

(c) The making of some provision for residents to recover from our unsuccessful opponent the reasonable costs incurred in opposing a proposal.

I note we now have renewable zones. These zones ought to take the pressure off other areas, and the better land. I am aware that applicants are not prohibited from applying outside the zones however in the interests of proper planning etc I suggest the zones ought to be promoted. I see from the internet the NSW Government proposes to continue to upgrade infrastructure to accommodate renewables and reach its targets.

The 'Ivey Report' (to which I will refer later), contains detail that suggests our NSW Government got it right, when creating the Central West(Orana) Renewable Energy Zone, in that the land in the Zone, is generally less productive, etc.

If a prospective applicant sees some problem with the zones the applicant ought, upon inquiry, so advise at its "drop in" sessions so that such a problem can then, and if the inquirer thinks appropriate, raise the foreseen problem with his or her State Member of Parliament.

My family and I are passionate about the land, environment and the community and also embrace renewables. My family like so many other families in this close community have

dedicated much of our time, effort, financial savings and indeed lives to our farm and to this environment.

I now move to the Applicant's Scoping Report, and for your ease of reference, I will adopt the same headings and numbering that has been used in the Scoping Report:

1. Introduction

1.1 Applicant

Elgin Energy is not, a legal entity. It ought not pretend it is something it is not. It is Elgin Energy Pty Ltd. It might receive funds etc from overseas, but that does not mean that Elgin Energy P/L is an international Corporation.

The internet does identify small solar projects completed in the UK and in Ireland. The English/Irish entity on its website Reports, "*Across the UK we choose sites that are grades 3 – 5. This land is not the most agriculturally productive land.*". The English/Irish entity appears to respect its country's top 50% grade land.

The legal entity in Australia, Elgin Energy Pty Limited has not, I suggest, exercised such restraint in this country.

The legal presence within this jurisdiction is Elgin Energy Pty Limited and it ought I suggest so describe itself.

Elgin Energy Pty Limited is a limited liability company incorporated in Australia in 2019. Initially its place of business was said to be in Queensland then Darlinghurst, Sydney and then Victoria. I do not have its current address. I do not know its net worth.

Glanmire Action Group on 14/15 May asked Elgin's principal – "Will the UK/Ireland company guarantee payment of the lawfully incurred debts of the Australian limited liability company and/or lodge bank security for the same?" The Group is yet to receive a response. Until a response is received, Elgin Energy Pty Limited, I expect with minimal assets, in effect enjoys immunity from unwelcome creditors. It may not have accessible assets.

Identical issues to the issue touched upon above arose in the United States in relation to Photon. When its international corporation as well as its local subsidiary was sued it sought to avoid liability upon the basis its international corporation was not within the jurisdiction. I will be pleased to supply the reference if you so desire. The issue is real.

1.4 Site Selection

The language used by the applicant places an inappropriate glossary upon the actual events.

Upon the assumption that in July 2019 Elgin Energy wrote to land owners in the locality it is not surprising that no interest was expressed by other land owners in particular those between the subject site and the grid at Raglan.

One is entitled to infer from such disinterest, that all such land owners in the locality respected and respect their land and their neighbour's land, the environment, the surrounds and foresaw adverse impacts. They were also entitled to reflect upon the State Government's recently designated renewable zones and the need to keep in place the Bathurst Regional Environmental Plan 2014.

The inference I invite you to draw is also consistent with the near unanimous opposition petition to which I will refer later.

The fact is that the subject site is owned by a Sydney resident. This aging owner advised the writer about 30 years ago that he was not a seller of the subject land, that he purchased the land pre-capital gains tax time (before 1985) and wished to fully financially benefit from that fact. He reported to the writer that he had not or had only rarely visited Bathurst or his rural property, that he had no interest in rural matters or indeed in Bathurst. He retained the land as an investment as it was purchased pre-capital gains tax.

More recently he has repeated the above sentiments to others.

The owner has leased and continues to lease the land to a farmer. He appears to separately lease the cottage on the property. The cottage is heritage listed. No member of the Group nor any contact of any member of the Group has ever met or knowingly seen the owner.

The Glanmire Action Group sought to "reach out" to the owner by sending him two letters. Copies are **attached**. The Group received no response.

Of course, within the law, an owner is entitled to do as he wishes with his land but the applicants so described "screening process" ought to be looked at in the perspective that I have outlined.

The so-called "screening" process served therefore on this occasion to identify the owner with no apparent interest in the land, the environment, and/or the community. This was the so-called "site truthing" to which the applicant refers.

"Screening and Site Truthing' ought also to have, and in truth, probably did, reveal that the Glanmire site:

a) Is on land identical to the Brewongle site, just a few kms away, and that was fixed upon by the Solar Proponent, Photon, in 2017.This proposal caused opposition by the community, (many who are the same as are opposing Glanmire) together with opposition by the local State M.P., the local (Orange) M.P, and finally the local Council.
b) Is a location on the Great Western Highway, at the foothills of the Blue Mountains, and at the gateway to the City of Bathurst, and the Central West? It is far more 'in your face', than Brewongle.
c) Is a location where, particularly in recent years, and while Brewongle was struggling under a Solar cloud, people have purchased surrounding properties for large sums, clearly paying a social/location price, and thereafter, have spent large sums of money, to present their properties as truly green, productive and aesthetically pleasing.

d) Is, 'at this place, the natural elements-the quality and health of the soil, the temperature range throughout the various distinctive seasons, and the rainfall, combine and interact to render this land with great productive potential'-David Harbison, Agronomist. As this land and adjoining land has done for generations, and is doing.
e) Is a location at which a Solar Plant will most significantly, visually aesthetically, and financially adversely impact upon the local and broader community.

These 'truths' about, 'site selection' were, at the very least, revealed by our small group in November,2020, as outlined hereunder.

Further, in November 2020 Elgin Energy Pty Limited and its assistant advised a small group of residents that Elgin had simply "chosen the site off a map as most suited itself without investigation of the site or otherwise". The so-described "desktop environmental due diligence studies and select site investigations for ground truthing" appears to have been embarked upon after Elgin committed itself to the subject site. Its retained consultants therefore have the task of satisfying you that Elgin Energy Pty Limited was, as things turned out and in retrospect, right in fixing upon this particular location.

In November 2020 Elgin Energy Pty Limited and its assistant "Energy Forms" had an informal meeting on short notice with just a few locals. Relevantly the few locals outlined issues such as:

(a) The importance of preserving, for rural production, rural land of the quality that exists on the subject site;

(b) The importance of preserving, for rural production, rural land of the quality that exists on the subject site given the expected increased demand for such land due to climate change;

(c) The level of rural production from the subject land and the potential financial loss to Bathurst farmers and retailers and the wider community if the land use is converted to a solar plant;

(d) The importance of this quality land to the farming community in particular young farmers searching for a viable ground;

(e) The rural/social value of the subject land and surrounds;

(f) The impact of a solar plant on an otherwise rural setting at the gateway to Bathurst and to the Central West;

(g) The inconsistency between Elgin Energy Pty Limited's proposal and the Regional Environmental Development Plan 2014;

(h) Our concern that no Bathurst resident would financially benefit from having the solar plant at the Glanmire location as distinct from it being located at the State Government's renewable energy zone namely Central West (Orana) Renewable Energy Zone;

(i) The concern that the pursuit of the solar proposal would have a huge detrimental impact upon the currently cohesive local community. We referred to the Brewongle proposal that appears to have permanently split relationships in particular father/son, uncle and aunt/niece and nephews, sisters, in-laws and mere friendships.

Elgin Energy Pty Limited's response to these issues was that we had in November 2020 given it much to think about and to check out before proceeding. It advised the Group that it would contact the Group further before approaching your department.

Elgin Energy Pty Limited's response turned out to be mere rhetoric. None of the issues are highlighted and addressed in any real way, in the Applicant's Scoping Report.

I note soil samples taken from the site in November/December 2020 were used for the so called "ground truthing".

The November/December 2020 samples were the subject of emails to our Group in terms as follows:

"Good afternoon Jo,
This is a courtesy email to let you and the group know that we will have a geotechnical expert out on the site next week. This is to undertake investigations as to the suitability of the site for a solar farm project.
Please contact 1800 947 933 if you wish to discuss.
Regards

Fi Cotter
Director"

It is now clear that the samples were not used or solely used to test the adequacy of the ground to take solar panels but rather were taken in the hope of putting in issue the categorisation of the soil by the Department of Agriculture, by our Regional Plan, and indeed by farm users and neighbours. The suggestion now seems to be that all bodies and people got the soil quality wrong and its productivity wrong and have done so for generations.

Of course a truthful email ought to have resulted in agronomists agreeing upon sample locations and soil tests. This regrettably was not to be. In truth Elgin Energy Pty Limited misled us. The soil samples appear to have been part of the so described "ground truthing" but were not to be shared with us.

The preceding paragraphs are also an explanation as to why our Agronomist, Mr David Harbison performed tests on properties nearby. I **attach** a copy Mr Harbison's report dated 16 November 2020.

2.2 Key Features of the Site

At this point in time I am not equipped to deal with each sub-heading in detail.

I can report however that we have four reports that touch upon several features and issues, including the soil, the impact upon the local and broader community, the financial impact and the serious insurance issues. For your information, I **attach** those reports as follows:

1. David Harbison, Agronomist report dated 16 November 2020 – already referred to;

2. Anthony Daintith, Town Planner report dated 11 December 2020;

3. Richard Ivey and Andrew Rice, Agricultural Consultants report dated 19 January 2021;

4. Craig Mizon, Insurance Broker report February 2021.

I also **attach** our brochure depicting the subject site.

Please note that clearly Elgin Energy Pty Limited neither checked out in any significant way the matters it promised to check before proceeding neither did it contact us further before contacting your department. It certainly did not engage on any checking.

5. ENGAGEMENT

5.1 Engagements Carried Out

The writer sees this matter as key to determining whether to allow an applicant's request for a SEARS.

As already observed our Group's hope is that an applicant's compliance or otherwise with this requirement will be fully considered with a view to discouraging applications that lack merit.

Your department's requirement that an applicant summarise the results of any early community engagement necessarily assumes that the applicant will bona fide engage and having engaged will frankly report upon the results/responses to such engagements.

Of course your department would expect frankness from an applicant particularly when the applicant is dealing with the public who, in many instances, have no spokesperson.

I suggest that in this instance the results of community engagement have not been frankly summarised to you and the scale and nature of impact of the projects has not been frankly identified to you.

I suggest the proposed approach to assessment and community engagement, and reporting on the same to you, has merely to propose to you to do things that ought to have been done by Elgin Energy Pty Limited before this Scoping Report was prepared and so before a SEARS is allowed.

1.1.1 Bathurst Regional Council

I know nothing of the meetings held with Bathurst Regional Council.

Appropriate engagement by Elgin Energy Pty Limited ought however have revealed to Elgin that Bathurst Regional Council has, as a group, to this point been noncommittal.

Elgin Energy Pty Limited ought to have revealed however that in 2017 the company Photon proposed a solar plant be installed on 500 acres of identical quality land just a few kilometres away from the current site. It ought to have revealed to you that at the time of the proposal Councils such as Bathurst Regional Council had less say in State significant projects but notwithstanding this fact Bathurst Regional Councillors, having considered matters, voted to ask Photon to find an alternative site.

Doing the best it could Elgin Energy Pty Limited ought to have advised you that the current site is in fact far more "in your face" – in relation to Bathurst City than was the Brewongle site.

Such a refreshingly frank report to you would have been, I suggest, far more accurate than the bland report that has been provided.

.

1.1.2 State Member.

Elgin Energy Pty Limited has reported to you that it requested a briefing and met with the State Member for Bathurst in October 2020. It has not however reported to you, the results of that engagement.

On 14/15 May Elgin Energy Pty Limited advised the writer that Mr Toole opposed its proposal but Elgin Energy Pty Limited advised the writer that it dismissed Mr Toole's opposition because it believed that he, Mr Toole, "doesn't like renewables anyway".

The Scoping Report fails to report upon the engagement with the Minister.

If Elgin Energy Pty Limited had truly engaged with the local State Member of Parliament Mr Paul Toole MP it would have reported to you that Mr Toole is a person with a considerable depth of rural knowledge. He is a Member with a rural background. It ought to have reported to you that he is highly regarded in the area and that he openly supported the appropriate opposition to the Brewongle site and his opposition was expressed to be in the interests in particular of the land quality, the environment, and the community. It ought to report to you that Mr Toole enjoys a reputation for being consistent in his views.

If Elgin Energy Pty Limited had truly engaged with Mr Toole I expect he would have advised Elgin Energy Pty Limited that the Brewongle solar site opponents lobbied to have a zone such as the Central West (Orana) Renewable Energy Zone established and lobbied for the subject quality land to be excluded from solar proposal sites. I expect Mr Toole would also have referred to the State Government's Central West (Orana) Renewable Energy Zone. In any event a true and genuine inquiry of Mr Toole would have revealed his reasons and I

expect his good reasons for his opposition to Elgin Energy Pty Limited's proposal.

Any meeting with Mr Toole that failed to elicit the matters outlined in the preceding paragraphs was, I suggest, a meeting for self-interest and self-interest only.

5.1.5 Local Community

As stated earlier in November 2020 a principal of Elgin Energy Pty Limited and a person from its retained consultant "Energy Forms" met with a small group of Glanmire residents. The matters covered at the meeting are outlined on pages 5 and 6, in particular (a)-(i)

In the months that elapsed between November 2020 – May 2021 the writer responded to media request for radio interviews and newspaper comments. On each occasion the media outlet advised that its attempts to contact Elgin Energy Pty Limited for comment or input had failed.

The so called "drop in session" on 14/15 May was expressed to be held to enable community questions to be answered by Elgin Energy Pty Limited.

Elgin Energy Pty Limited purported to contact the people impacted upon by for example notifying residents within a three kilometre radius. Most residents in that radius but not all appear to have been contacted. In any event within the three kilometre radius there are approximately 56 land owners and 66 homes and I can report to you that all but five have thus far signed an informed petition against Elgin's proposal. Most of those had signed before 14/15 May.

On 14/15 May Elgin Energy Pty Limited was advised of this fact.

The meeting with Elgin on 14/15 May revealed - as to what the Bathurst Community might be losing:

(a) It reported the lack of knowledge of the quality of the soil/ground but thought the Department of Agriculture were probably wrong in characterising it as it had;

(b) It reported the total lack of knowledge of the current anticipated rural income from the subject land;

(c) It reported the lack of knowledge of Bathurst Regional Environmental Plan 2014, the plan's aspiration for our region and its stated importance of avoiding conflict such as conflict between the proponent and the community.

Note: Bathurst was likely to experience other financial losses including loss of jobs and a slowing in rural business and construction etc. However, such matters were not canvassed because of Elgin's clear advice and attitude that it was surging forward no matter what.

Elgin could not/would not assist by advising what Bathurst was likely to lose.

As to what the Bathurst community might be gaining:

Question: If the project goes ahead here as distinct from going ahead in the State Government designated zone, are Bathurst residents likely to receive any additional financial benefit by either electricity bill reduction or otherwise.

Answer: "Impossible to say".

Comment: We believe it is not impossible to say. We believe that the truthful answer would have been "no". In any event one can clearly say that Elgin could not report any benefit to the Bathurst residents. No other gain suggested. Any person asking the question outlined above would have received an unhelpful and probably inaccurate answer.

Of course its reference to construction jobs (in the community with near full employment) was not canvassed because of Elgin's expressions that it was forging forward no matter what.

As to why Elgin proposes this site ("one is just unilaterally fixed upon by a map" as suitable for itself) as distinct from the State Government's designated zone:

(a) The zone has not got the infrastructure to accommodate us;

(b) We are not prohibited from putting solar here;

(c) Elgin declined to address the State Government's undertaking outlined on the internet to increase even further the zone's infrastructure.

I advise however that no question that related to any of the eight issues outlined above was answered with any relevant or helpful depth.

I have read the letter forwarded to you by Pauline Bonanno dated 1 June 2021 and I agree with its contents.

In the end result I suggest Elgin Energy Pty Limited ought to have advised you that it had two community engagements. One informal with a few locals in November 2020 and one "drop in" session on 14/15 May 2021.

It ought to have informed you that it had resisted engagement with the media and failed to investigate the merits of resident's issues and so it failed to answer questions from the community on any of the issues raised by them. Issues said by Elgin in November 2020 to have given it much "food for thought".

Elgin Energy Pty Limited's failure to report to you that the result of its community engagement was to be informed that nearly all (in fact 61 of 66) land owners/residents within a three kilometre radius had signed an informed petition against its proposal. Elgin Energy Pty Limited also failed to inform you that by failing to perform any

meaningful investigation between November 2020 – May 2021 it was able to avoid meaningfully engaging with the community on the matters outlined on pages 5 and 6 of this letter (a) – (i).

Conclusion
By an Applicant properly complying with the Scoping Report requirements, your Department ought to be well able to assess the merits or otherwise of an application, the level of community support or otherwise for the application outside the designated zones, and the scale and nature of impact of the project, and so decide whether to allow an applicant's application to take the next step.

Having regard to:

a) Your Department's clear Scoping Report requirements referred to on page 1.
b) The impacts clearly conveyed to Elgin Energy P/L between November 2020- 14/15 May 2021.
c) The Applicant's failure to adequately report to you the results of early community engagement, and/or identify the scale and nature of the project.
d) The likely community impact outlined in this letter.
e) The scale and nature of the impact of the project, having regard to these submissions and the reports from:

David Harbison-Agronomist
Anthony Daintith-Town Planner
Richard Ivey and Andrew Rice-Agri Consultants
Craig Mizon-Insurance Broker

I ask that you reject the Applicant's Application for a SEARS

Yours faithfully
Peter Hennessy SC

NOTE : I note your Department contemplates a view of the location. If you are so minded, on this occasion and if it accords with your protocols, I or an alternative Group Member, will be pleased to accompany you, always respecting the protocols you no doubt have in place.

Document 25: P. Bonanno letter to P. Toole 8.06.2022

Sam and Polly Bonanno
244 Brewongle Lane
GLANMIRE NSW 2795
Mobile: 0439 393 035

8 June 2022

The Honourable Paul Toole MP
Deputy Premier of New South Wales
C/- The Honourable Paul Toole's Office
Howick Street
BATHURST NSW 2795

Dear Sir,

Re: Glanmire Action Group
Elgin Energy Pty Limited
Solar Plant Proposal at 4823 Great Western Highway, Glanmire NSW 2795

Introduction

1. I am the Secretary of "Glanmire Action Group". Our group was formed a year or so ago to oppose a proposal by Elgin Energy Pty Limited to install a solar plant on 500 acres of cultivation land at the abovementioned address. I **enclose** a copy of Elgin's brochure and our brochure.

2. Our Group has many members including many (including me) who were members of "Brewongle Action Group" formed to oppose a similar unmeritorious proposal by Photon at Brewongle just a kilometre or two away. You were then most supportive of our Group and we were most grateful. As you know, Photon finally realised its proposal was misguided and so abandoned it.

3. Your respect for the rural community and the land is clear. You have a good rural background and your appropriate support in opposing the Brewongle proposal demonstrated your entrenched values.

4. I am writing to you, our local State MP and Deputy Premier, to complain about the New South Wales State Government Department of Planning's legislation and its process for "State significant projects" as it impacts upon us and to ask you for your assistance. I have had assistance in writing this letter.

After 2017

5. Having assisted the Brewongle Action Group, you were well familiar with the planning provisions as they existed as at 2017. Since 2017, there have been legislative changes, and Planning Departmental changes.

The Creation of Renewable Energy Zones

6. This was, on the face of it, a major step forward in the interest of renewables, the environment and the community. Legislators such as you listening to parliamentary debates could be forgiven for thinking the creation of these zones would have put an end to proposals and conflicts such as this.

   The zones were "trumpeted in". Our local "Orana" zone was created on an area having regard to factors that included the fact that the rural community generally wanted solar at that location and the Government identified the area as consisting of poorer quality soil. Our Orana zone was announced by your Government to create power for 1.4 million homes by the mid-2020s and the pressure and

community uncertainty and adverse impacts upon the health and wellbeing of people outside the zones would be lifted.

In truth, nothing has in fact changed. There has been no restriction on proponents such as Elgin seeking to impose its will upon the community. A community well outside any zone.

The fact is applications within the Orana zone were nine times the applications required to achieve the mid-2020s target.

Further, however, I am reliably informed:

(a) The Government target of 1.4 million homes by the mid-2020s will in fact be achieved; and

(b) There is plenty of room for more solar within the Orana zone. Your Government just needs to give the Infrastructure Authority the "go ahead", It is ready to proceed.

So, why not stick to your Government's plan? Stick to the zones and stop outside impositions and protect your constituents, the 2014 Regional plan, your communities and their health and wellbeing.

Some Amendments to the Planning Process

7. Amendments did occur, and you Minister could again be forgiven for thinking the Planning Authority could "weed out" spurious applications at an earlier or early point in time, thus saving communities from years of uncertainty.

   I have been advised however, by the Planning Authority, that it recognises no such power. Its so described "Scoping Report" is little more than a formality.

8. The Planning Authority's introduction of a CCC. A farcical process, a box ticking exercise, likely to be incorrectly reported upon.

9. The 5 kilometre and 10 kilometre distances principles introduced in late 2021.

   "Toothless Tigers". The less discerning and more inconsiderate the proponent, the less impact and deterrence these amendments have.

   Further, I am advised that this proponent expects it does not even apply to it. This assertion is inconsistent with a letter forwarded by the Planning Authority to one of our members Ms Diane Willman and dated 23 December 2021. I **enclose** a copy.

10. The Planning Authority has been clear that locating solar infrastructure on soil with a class capability of 1, 2 or 3 should be avoided.

    This land has been cultivated for as long as people can remember. It continues to produce grain. It is class 2 and 3.

    This, however, does not deter this applicant, a stranger to this country, from seeking to reclassify the land and so "barge on" to defeat the community and contradict the obvious. It managed to obtain an,' out of town' classification of 4 and 5. Please look at the **enclosed**:

    (a) Photographs 1 and 2 – depicting the subject land in 2021 and again in 2022;

    (b) Photograph 3 – depicting typically classed land and produced by the New South Wales Office of Environment and Heritage.

    I suggest the photograph demonstrates the farce. Nothing, however, reduces the adverse impact upon your constituents while this proponent barges ahead. The proponent is therefore uninhibited by:

(a) Your State Government's renewable energy zones;

(b) Insurance issues;

(c) The 10 kilometre and 5 kilometre amendments;

(d) The class 1, 2 and 3 principles;

(e) The so-called need for consultation.

The fact is of course that consultation has not relevantly occurred. Typically, undated Elgin letters are received by community members after any proposed event has been held. This company is uninhibited because there appears to be no "bottom line", just the Authority's expressions of preferences.

Insurance

11. The Planning Authority advised us a long time ago that insurance was not a matter it considered in any detail. Insurance is, it advised, a matter for the legislature.

This is a most serious matter and we ask your Government to treat it as such. It threatens farming on surrounding land and must be dealt with.

Members of our Group have I understand on several occasions already written to you drawing your attention to this issue as well of course of many others.

Conclusion

A. More detailed complaints are included in a letter forwarded by Peter Hennessy a member of our Group to Mr Quinlivan (Department of Planning) dated 23 May 2022. A copy of his letter is **enclosed**. The complaints though sought by Mr Quinlivan have not yet been acknowledged by the Department.

B. There appears to be nothing to stop a proprietary limited company with a paid-up capital of $100 or less pursuing a solar proposal on 500 acres of cultivation land at the gateway to Bathurst and surrounded by grain and pasture paddocks jealously preserved as such by Bathurst Regional Council and within which there are residents and many more currently permitted residences on 250-acre blocks. The Planning Authority does not investigate or relevantly assess a proponent.

Both at Brewongle and now at Glanmire, the proponent is a proprietary limited company. Each has the funds its backers/proprietors choose to feed it. It follows it can readily go into liquidation to avoid an unwelcome creditor. Photon so-called did it many (30 or more) times.

In the end result, Elgin can say what it likes, if it is legally accountable to us it can avoid payment by liquidation. We on the other hand are legally liable. Is this "a level playing field" in your Government's view?

C. The planning provisions may well have worked before renewables came on the scene.

Most certainly with the introduction of renewables, the process seems to have inherent problems. It seems to us with respect, there is an assumption or expectation that a proponent will act reasonably honourably and report reasonably truthfully. In my experience, such assumptions and expectations are inappropriate. For a greater explanation of this, please see Mr Hennessy's letter **enclosed**.

D. Your New South Wales State Government ousted the jurisdiction of the State Court from this "State significant project" process.

In the case of renewables on my observations, proponents' statements and representations frequently require scrutiny, investigation and responses.

The responsibility for this in fact falls upon the community. Did your Government intend this? Surely not, but this is nevertheless the fact!

Our Group is spending tens of thousands of dollars and expending tens of thousands of dollars in time to present a truthful picture to the New South Wales Authority.

Our Group will never be compensated no matter how outrageous this proposal is. The proponent will escape with millions of dollars profit if it flukes a win.

Is this a "level playing field" in your Government's view?

E. Proposals outside the designated zones should by legislation be stopped/prohibited until further notice.

The State Government's renewable energy zones should be fully supported and utilised.

If your Government is satisfied with its stated target of 1.4 million homes by mid-2020s then sobeit. If the target is, or ought to be revised or a further target set, then infrastructure should proceed as contemplated.

Only upon exhaustion of the renewable energy zones ought there be any reason/need to revisit the allowing of proposals outside those zones.

If notwithstanding what has been said above proposals outside the zones are not stopped/prohibited then:

(a) Proposals within the 5 kilometre and 10 kilometre distances; and/or

(b) On land historically classed as 1, 2 and/or 3 or historically used as such

should be stopped/prohibited except by leave.

Leave ought involve an early independent investigation of the subject land by an independent body.

F. A person in authority within the Planning Authority ought to be allocated to a proposal and relevant parties ought to be so advised and entitled to structured access for directions, etc.

G. Adequate and respectful times ought to be provided to all relevant parties. Currently, a proponent is allowed about two years to complete its EIS and the community is allowed about 28 days to respond. These time limits are I suggest disproportionate, unfair but perhaps are a reflection of attitude towards your community.

There should be provision for awarding costs reasonably and responsibly incurred by the community.

As already observed, this letter needs to be read in conjunction with Mr Hennessy's letter to Mr Quinlivan, a copy of which is **enclosed**.

I write to ask you Minister that you act in our interests.

Yours faithfully,

Polly Bonanno

Document 26: Correspondence - Offering to Meet

Hi [redacted]
I have your email of 23rd August, and note your further offer of an 'on line' meeting, on Tuesday next, 31st August.

I confirm my view, already conveyed to you, that 'one on one' meetings, do not interest me.
I am concerned that Elgin will misrepresent the meeting.
I confirm I remain interested and willing to participate in a meeting with Elgin, as one member of a group-'Glanmire Action Group.'

Our group has always been available, and has advised Elgin we are available to meet with it at a mutually convenient time and place. The fact is Elgin has never proposed or agreed to such a meeting. A few more recent offers by our Group were:

a) (Insert dates of Polly's letters/emails)
b) Invitation in Peter Hennessy's recent letter, recently published in the Western Advocate.

I should refer to an 'Information' event arranged by Elgin, and held at Bathurst Entertainment Centre on ---. [redacted], you will vividly recall Elgin's principal walking out of that information event, when he was asked a question by a person who attended the event. Elgin's principal did not return. The person who asked the question was a stranger to our Group. Importantly you advised you would report that your client's principal 'aborted' the event. Please confirm you did so report.
I suggest I am entitled to far more consideration/consultation than an on line meeting. Your client has had years to consult, and consult properly, and my offer to meet still stands. Covid is over.
My rural property is my large asset, that has taken a lifetime to achieve, and I believe that consideration for it and for me, warrants far more than an on line meeting, to discuss possible impacts.
Finally, I am of the opinion that, in the circumstances, it is preferable any meeting be held at a mutually convenient venue, rather than at a Group member's home. I will be pleased to liase with you to agree upon a convenient time and place. I will be pleased to advise other Group members.
I look forward to hearing to you.
Yours faithfully,
Polly Bonanno

PS I have read the Draft Minutes of Elgin's 'Neighbours Meeting,' held on 9th August.
I note, 'T.A. highlighted..... through them'
Such an assertion is, I suggest, false. Communication has not occurred. Communication through me is easy.
Letters are invariably undated, and arrive after any event.

From: glanmireactiongroup@hotmail.com
Sent: Wednesday, 31 August 2022 5:54 PM
To: breannah.j@nghconsulting.com.au
Cc: peter_hennessy@hotmail.com; Karyn Taylor
Subject: meeting

31th August 2022

Hi [redacted],

Glanmire Action Group meeting request,

I confirm we remain interested and willing to participate in a meeting with Elgin, and with other members of 'Glanmire Action Group.'
I confirm our view, already conveyed to you, that 'one on one' meeting's do not interest us.

Our group has always been available, and has advised Elgin we are available to meet with them at a mutually convenient time and place. The fact is Elgin has never proposed or agreed to such a meeting. A few more recent offers by our Group were:

a) At the 2nd CCC meeting on the 26th April 2022
b) Invitation in Peter Hennessy's letter, recently published in the Western Advocate 13th July 2022 the letter was in part response to Elgin's stated comments to the article in the Western Advocate.

I refer to an 'Information' event arranged by Elgin, and held at Bathurst Entertainment Centre on 18th May 2022[redacted] you will vividly recall Elgin's Principal walking out of that information event, when he was asked a question by a person who attended the event. Elgin's Principal did not return. The person who asked the question was a stranger to our Group. Importantly you advised you would report that your client's Principal 'aborted' the event. Please confirm you did so report.

I suggest we are entitled to far more consideration/consultation than a mere drop-in session. Recent letters to our Group members are invariably undated, and arrive after any event. Your client has had years to consult, and consult properly, and our offer to meet still stands. Consideration for our Group members and our rural properties, warrants far more than an on-line meeting or drop-in session, to discuss possible impacts.

Finally, we are of the opinion that, in the circumstances, it is preferable any meeting be held at a mutually convenient venue, rather than at a Group member's home. I will be pleased to liaise with you to agree upon a convenient time and place. I will be pleased to advise other Group members.

I look forward to hearing to you.
Kind Regards,
Polly Bonanno
On behalf of the Glanmire Action Group

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Peter R Hennessy
"Adelong Park"
457 Brewongle Lane
GLANMIRE NSW 2795

E: peter_hennessy@hotmail.com
M: 0414 375565

13 July 2022

Dear Sir/Madam

I read with interest your article "NSW Deputy Premier Paul Toole shares concerns of Glanmire solar opponents".

I am pleased to read our State member the NSW Deputy Premier, Mr Paul Toole supports the Glanmire Groups' opposition to the proposed Solar Plant at Glanmire.

Mr Toole joins the ranks of all rational thinking people aware of the several NSW Government created Renewable Energy Zones, one of which is nearby. I should be fully utilised first.

The zones were created having regard to factors including existing infrastructure, land quality and the fact most farmers welcomed solar. It provided an income the poorer land did not provide.

The so described Elgin "spokesperson" description of community support is totally at odds with the groups informed petition against the proposal. A petition signed by 91% of residents within a 3 km radius and of course many many more.

The so described Community Consultative Committee meetings were farcical. I identified it as such and so resigned after the first meeting. My reasons are clearly outlined in my resignation letter, a copy of which is attached.

I am pleased to learn all others resigned and any suggestion they failed to come to their own view of this farcical process is an insult to them.

Even the Planning Authority itself identified numerous deficiencies in its own CCC. Its own detailed and extensive criticism can be found on the internet. Yet the Planning Authority has continued to force this process upon us.

In truth the Proponent has refused to meet at an open forum. It no doubt thrives on secrecy, division and so called 1 on 1 meetings.

I now extend to Elgin an open invitation to participate at an open forum at a venue to be agreed upon in Bathurst.

I further extend to Elgin an open invitation to attend our Groups' public information night to be presented at a Bathurst venue on a date late in July or early August, yet to be fixed upon. This will be a night that ought to assist community representative, local government and state and federal politicians in learning what is going on in communities.

There was an information day put on by Elgin in Bathurst on or about 18 May. The fact is however, Elgin's principal, Mr [redacted] decamped having refused to engage and Elgin's appointed consultant appeared shocked as she agreed to report that Elgin "aborted" the meeting. A question still arises however – "Did it so report?"

The remainder of your article that suggests extensive consultation and significant support is totally at odds with our groups experiences.

Yours faithfully,

Peter Hennessy

Second CCC 1

26 April 22.

Social Impact Study and Scoping report

[redacted] (NGH consulting) advised he and his team would like to speak at the CCC next meeting, covering economics of the area, noise, traffic, social impact and identify people to interview on certain aspects and provide progress.

JP reiterated that the dust on Brewongle Lane associated with vehicle movements would be a concern.

[redacted] stated traffic and dust are certainly an issue and if the road is not sealed the road will have to be watered.
NS stated the road is a public road and it should be sealed, need traffic lights, see if turning lane is required.
[redacted] noted traffic management issues to be worked through.

Environmental Impact Statement (EIS)

DR provided a summary of what needs to take place and what will happen over the next few months. The CCC forms part of the consultation associated with the EIS along with specialist consultations that will continue to be undertaken.

[redacted] noted that the Development Application (DA) should be lodged later in 2022. DR and NS both agreed that once the EIS goes on exhibition, the time allocated for submissions from the general public, interested groups, council etc on the Solar Farm proposal is 28 days. NS suggested 40 days.

[redacted] asked if the specialist impact assessment studies will be available to CCC members before it goes to the public domain? BRC would like time to read all the reports as well. In response, [redacted] observed that this would notably impact upon the timing of submitting the EIS.

Other Business

[redacted] spoke on building engagement. Elgin Energy representatives will be speaking to BRC Councillors tomorrow, and discussions with the Bathurst Business Chamber executives. An on-line survey is to be conducted.

PB reiterated that Elgin should undertake an open community meeting with the Glanmire Action Group and listen to community unput.

JP noted that, as President of the BCCAN, the Network had discussed the in individual points raised in PH's one page letter, explaining the concerns that residents had with the proposal. Some BCCAN members questioned the points raised as well as the conduct of people at the last CCC meeting.

Document 27: Signed Opposition, Bathurst Show Engagement

Glanmire Solar Plant EIS Clarification
Bathurst Show April 2022

I DAVID GARCIA CADEL (name) of 461 BREWONGLE LANE (address), GLANMIRE, say

1. I attended the Bathurst Show on 29/30 April 2022.
2. I with VIRGINIA HENNESSY attended Elgin's Stall.
3. I advised my clear opposition to the subject proposal as did those who were with me.
4. I wish to make the following additional comments:
   I orally recorded my objection. I was not offered a petition to sign. Had I been offered a petition I would have recorded my petition. I/We was there for 30 minutes and I did not observe any other person that would agree or consent to the project. The person I came across from Elgin Energy was Timothy Purcell, we had a common link as he studied in Spain at UL university and I am a Spanish citizen and familiar with the university

Signed: [signature]

Dated: 2 / 12 / 2022

Glanmire Solar Plant EIS Clarification
Bathurst Show April 2022

I Virginia Hennessy of 461 Brewongle Lane,
(name) (address)
Glanmire NSW, say

1. I attended the Bathurst Show on 29/30 April 2022.
2. I with Edward David Garcia Cagel attended Elgin's Stall.
3. I advised my clear opposition to the subject proposal as did those who were with me.
4. I wish to make the following additional comments:
I made my objections clear in conversation with [redacted] and his colleague. I am very aware of issues surrounding the Solar plant. I do not recall seeing a petition. If there was ~~a~~ ~~do~~ petition available for signing I would have added my signature to it.

Signed: VHennessy

Dated: 4 / 12 / 2022

Glanmire Solar Plant EIS Clarification
Bathurst Show April 2022

I Kimi Ryan (name) of 5018 Great Western Hwy (address), Bathurst., say

1. I attended the Bathurst Show on 29/30 April 2022.
2. I with —— attended Elgin's Stall.
3. I advised my clear opposition to the subject proposal as did those who were with me.
4. I wish to make the following additional comments:
   The proposed development in wrong area. Prime land.
   Too close to residential areas.

Signed: K Ryan

Dated: 7 / 12 / 2022

Glanmire Solar Plant EIS Clarification
Bathurst Show April 2022

I Bronwyn Mitchell (name) of 20 County Way Bathurst (address) Administrator., say

1. I attended the Bathurst Show on 29/30 April 2022.
2. I with Kate Anderson attended Elgin's Stall.
3. I advised my clear opposition to the subject proposal as did those who were with me.
4. I wish to make the following additional comments:
I was also present at the Bathurst Show solar stall when 2 acquaintances of mine also attended the stall not only did I express my opposition I also sort out & signed a document to that effect I drew my acquaintances to the existance of the forms & they also signed their opposition

Signed: [signature]

Dated: 6 / 12 / 2022

These 2 persons names are Kate Anderson Brewongle & Emily Horrington of Brewongle.

Glanmire Solar Plant EIS Clarification
Bathurst Show April 2022

I Polly Bonanno (name) of 244 Brewongle Lane, (address)
Glanmire, say

1. I attended the Bathurst Show on 29/30 April 2022.
2. I with Sam Bonanno attended Elgin's Stall.
3. I advised my clear opposition to the subject proposal as did those who were with me.
4. I wish to make the following additional comments:
Sam & I attended the stall at the Bathurst Show ~~to~~ and asked for a objection form. We then handed over Glanmire Action Group petition approx 300 signitures We walked away and filled out the objection form then handed it back to Ben Smith.

Signed: [signature]

Dated: ___ / 12 / 2022

Glanmire Solar Plant EIS Clarification

Bathurst Show April 2022

I Denise Hennessy (name) of 457 Brewongle Lane (address), Glanmire, say

1. I attended the Bathurst Show on 29/30 April 2022.
2. I with Peter Hennessy attended Elgin's Stall.
3. I advised my clear opposition to the subject proposal as did those who were with me.
4. I wish to make the following additional comments:
   I am confident but not certain that I, along with my husband, signed a petition objecting to the proposed Solar Plant. I definitely saw others sign the petition

Signed: Hennessy

Dated: 3 / 12 / 2022

Glanmire Solar Plant EIS Clarification
Bathurst Show April 2022

I Mark Ryan (name) of 5018 Gt Western Hwy Glanmire (address).

Farmer, say

1. I attended the Bathurst Show on 29/30 April 2022.
2. I ~~with~~ Did not attended Elgin's Stall.
3. I advised my clear opposition to the subject proposal ~~as did those who were with me~~. at the open day at Woodside.
4. I wish to make the following additional comments:
~~If was amazed the proponent chose this site for a solar farm. I told the proponent that this property was prime agricultural land and it was wrong to put a solar farm there.~~

Signed: M a Ryan

Dated: 6 / 12 / 2022

I provided him with more information about the land. Next I learnt that Elgin had got soil tests to try to contradict what I had said. If I went to there stall at the show I believed they would used what I said to there advantage. I leased this land for approximately 16 years. from the late 1980s to the early 2000s. I can say that this land was equal

to any other land I farmed and better than most. I harvested in excess of 500 ton of wheat off "woodside" in 1996. being the crop sown winter 1995.

M a Ryan

6/12/22.

Document 28: P. Hennessy – Emailed Letter of Resignation 4.04.2022

Date: 18 March 2022
Dear David,

I have your Draft Minutes of the first Glanmire CCC, thankyou. Please note it was held at Bathurst, not Nundle.

I do have a few observations and set them out as follows:

1. As to “observers”. I confirm I represent a group and confirm there are many many residents most concerned about Elgin’s proposal. I suggest the meeting ought to be public to enable such persons to attend.

2. As to 4, paragraph 2. The Proponent ‘Elgin Energy P/L’ did not introduce itself. It introduced ‘Elgin Energy’. Such a body does not exist. In so far as entities exist in U.K. and Ireland, they have no legal identity / responsibility here. The introduction was, I suggest relevantly erroneous. I would appreciate [redacted] advising if I am wrong and/or the UK and Irish companies are residents/trading here.

   The minutes suggest that I observed, ‘there wouldn’t be capital within Australia for the job’. That was not my concern. My interest was whether the legal entity within this jurisdiction has assets to meet its debts as they become due, including its liability for false and misleading conduct/statements.

   It is not uncommon for P/L companies to avoid liability by simply going into liquidation. This most important concern could of course be avoided by the UK or Irish companies carrying on business here.

   My highly relevant and important question remains unanswered. I suggest our Glanmire Action Group’s brochure is close to accurate and people are being mislead. If we are being mislead, we want to ensure we have a legal remedy against a Company with assets

   3As to 4 paragraph 5

   I asked for [redacted] to act on his promise, made many months ago to respond to the insurance concern. Our group provided a copy of an insurance brokers report. Our broker reported the proponent’s farming neighbour would, for his harvesting activities, be either unable to obtain

insurance or the premium would be prohibitive. It follows the neighbour if he/she/it continues usual farming activities would be relevantly uninsured and at the mercy of the solar plant proprietors. This is commercially intolerable. The issue has not been addressed. I resist private conversation, it ought, I suggest, be addressed in writing before the next meeting and more fully at the meeting.

4As to 4 paragraph 9;

(a) [redacted] advised, I suggest '1 to 3 jobs'.

(b) In response to the reference to the delivery of 21 solar projects. I asked 'how many in Australia?' The answer was, I suggest, not clear. If 21 is relevant surely the number in this country, delivered by this proponent is relevant.

Reference was made to some development in Armidale and I inquired as to the use of 'local businesses'. This inquiry was shut down.

If the proponent's reference to local employment is relevant, then testing the accuracy of such statements is I suggest, most relevant. [redacted] might consider providing such information in writing before the next meeting.

5As to 4 paragraphs 11 & 12;

PH raised concerns about:

(a) The accuracy of Elgin's Scoping report .

(b) The accuracy of the report upon the discussion with Mr Toole MP

PH enquired as to whether a copy of his letter to the Planning authority dated 9/6/21 had been sent to Elgin for its response. [redacted] advised 'yes' and advised it had responded to the Authority. PH advised DR that the Planning Authority sought his agreement to sending a copy of his letter and PH's agreement was given, but he asked that Elgin's response be conveyed to him, for comment and DPA agreed. This, however, has not occurred. My impression was that D.R. was intending to make an enquiry. Please advise if I am wrong.

6As to 4 paragraph 14;

'one pager', provided.

7As to 5;

PH in his 'one pager' identified main concerns. This list ought be added for response from Elgin. I suggest it is far more efficient, if responses can be in writing, and circularised before our next meeting.

Conclusion

1 I ask [redacted] provide timely and accurate information to the CCC. Responses to 234and 5 above, ought be provided within 28 days of the meeting, as your protocol requires. I see CCC emailed my 'one pager' to [redacted] ought include responses to this document within the 28 days.

2 I ask DR respond to my impression referred to in 5 above.

3Please note – without real responses, we leave the first meeting, merely being taken through the Proponent's glossy brochure.

Kind Regards,

Peter Hennessy

Glanmire Action Group

Date: 4 April 2022
Dear David,

RE: Glanmire Solar Plant Community Consultative Committee

I am writing to withdraw/resign as Glanmire Action Group's representative on your Community Consultative Committee. I have informed my Group of my withdrawal/resignation and provided to it a copy of this letter.

Reasons:

1. My occupation was, until retirement, a barrister, a Senior Counsel. Invariably, when appearing in court I was accompanied by fellow lawyers and most importantly, the client, the person most likely to be impacted upon by the proceedings. He/she was the most important observer.

2. Before I accepted my Group's request to represent it, I contacted you David and advised you that if my group members were not permitted to observe, I would be reluctant to be their representative. Any hearing that might impact upon them, ought, in my view, be open to them. You David, correctly advised that you had a discretion to admit observers. With that reassurance I agreed to this appointment.

3. There is need to understand this is the 2nd time in my retirement, that I have been asked to assist community groups, with limited financial means to advocate their totally justified opposition to obviously inappropriately located solar proposals. I have been pleased to assist gratuitously.

   On each occasion the Proponent has been a limited liability company with no/minimal assets within our jurisdiction and available to creditors. It follows that such Proponents, if legally called upon to account for misstatements etc, can simply go into liquidation.

4. Of course, the preceding paragraph may not apply if the same company in fact develops the site. You will recall this proponent suggested it was undecided, as to whether it would develop this site, however, such expressed indecision by the Proponent, not only went unquestioned at your first meeting, but it is/appears to be inconsistent with its business model, published elsewhere in this country.
   On both occasions the Proponent has been a Corporation foreign to the area. On the previous occasion, our opposition was successful. We refused to participate in secret or one on one meetings, and at a more public meeting the Proponent promised to answer questions within 21 days, but in fact, the Proponent never returned. The public arena was what was required to achieve accountability and truth.

5. On this occasion, the land 'nominated' for the solar plant is owned by a person who lives well away from the area. He refreshingly admits he purchased the land before the 1984 Capital Gains Tax changes, and wants to maximise his profits. He has no interest at all in rural matters, the local community or indeed Bathurst or the Region.

He has rarely visited the area and has declined to meet any neighbour. It is unlikely his tenant farmer has actually met him.

By inference all land owners between the proposed block and the Raglan Sub Station had sufficient respect for the land, the community, residents, the Region and the NSW Government's REZ, to reject the advances that good sense would suggest the Proponent made.

6. For many months now, our Group has been subjected to this Proponent's rhetoric and spin.

   At a stage, our Group read the Proponent's 'Scoping Report', and in accordance with Planning Authority's protocol, our Group articulated its complaints to the Planning Authority, as to the report's accuracy and adequacy. Thereafter the Planning Authority advised -
   (a) It had issued a SEARS; and
   (b) Did I mind if the Authority passed on our complaint letter to the Proponent for its response

   As to (a) I understand the issue of the SEARS, was in fact near automatic. The accuracy of the 'Scoping Report', appeared to have no relevance to anything in fact. A mere box ticking event.

   As to (b) I advised I agreed to this course, with the Authority in return agreeing to my request, to forward to me, the Proponent's response.

   At the first CCC meeting, the CCC was informed by the Proponent, that it had in fact, replied to the Authority. The Authority seems therefore, to have failed to honour its undertaking to me, the Community Representative. What a farce! The Community's work, research and effort appears to count for nothing.

7. At our 1st CCC Meeting on 9 March, I noted the Committee consisted of the Proponent, to advocate the proposal, the writer, to advocate community opposition, a Council representative no doubt concerned to uphold Council's Regional Plan and community wishes, other persons to represent nearby residents ,then others with clearly expressed agendas, namely Greens and Climate Change advocates.

   One would have thought an open minded Committee would want to get fairly informed by hearing from Town Planners, agronomists, agriculturalists and financial experts, and Insurance experts, a REZ expert, to mention just a few.

   Climate Change and "Green" exponents might also have had a role. In truth, we all are/ought to be, green and climate change believers, but perspective is important, and the various tiers of Government are important.

8. I am reliably informed, that at that 1st CCC meeting, there was "hissing" when Elgin was questioned. Further, when I indicated existence of a financial report, concluding

an annual rural economic loss to the community in the order of $240,000, if rural activities were to cease on the subject land, that appeared to be instantly and audibly dismissed by a committee member. I have no doubt that the committee member had not the faintest idea that for example, overheads in producing a crop would have been expended in the community, and so if lost, are a financial loss to the community. Of course, the member did not ask for the Report itself. These matters do not indicate an open mind.

I have grave concerns as to whether the Insurance issue, touched upon by me at our first meeting, will be articulated to be understood, answered, or in any event, will be of any concern to any Committee members, with an agenda.

9. The Committee has been left to purportedly deal with this proposal, without being guided by reference to planning principles, or recently, so described, important changes to those principles, made in the interest of the Community

10. Instead of some important instructions to the Committee, upon basic planning principles, we embarked upon Elgin's story. You recently appropriately agreed that the first Committee meeting was dedicated to the Proponent simply taking the Committee through the Proponent's glossy brochure. We were shown a photograph of some Solar Plant and a battery. I suggest the simplicity of the presentation was demeaning.

    I note you David, contemplate another 2 perhaps 3 meetings.

    Any attempt to challenge the proponent's superficial simplistic story, was shut down.

11. I was asked to prepare a 1 page document outlining my group's concerns. I prepared the document and in it referred to several well reasoned reports

    After many months those reports remain unanswered by the Proponent. I asked the Proponent be requested by you, David, to respond in writing before the next meeting, and asked that the committee have the chance to consider such issues at the next meeting:

    It is surely not too difficult for this Proponent company to respond and put something of consequence in writing.

    I now have your Agenda Discussion for the next meeting and see it makes no reference to my request.

    The prospects of dealing with real matters of concern in a real way, in the 1 or 2 meetings after next, are slim indeed.

12. I received from you David, your Draft Minutes and accepted your invitation to comment. I see my comments appear to have been disregarded.

13. Finally and importantly, you recently advised that you received an array of responses from committee members and so had decided to not admit observers. It follows this conduct of concern to me, will go unobserved.

Conclusion:

1. I have seen the huge detrimental impact a proposal such as this can have and is having upon the health and well being of a community and on individuals.

2. In our open society I have been accustomed to open forums. I am accustomed to openness and public scrutiny. In my many years of experience, clients, persons with vested interests and indeed the public, respect an open process.

   In our society, our Courts, ICAC, Enquiries, Parliamentary sittings including sub committees, are generally open to interested observers. Conversely, closed forums are I suggest, dangerous and are rightly viewed with suspicion. I view this process with suspicion

3. I note that notwithstanding the obvious and readily avoidable evil of 1 on 1 meetings, your Planning Authority still apparently encourages them.

4. Having regard to the matters outlined above, I cannot assure our group that their concerns will be appropriately addressed or considered. I cannot assure them that this self imposed, secret process will rise above lip service to a process. Regrettably I view this process with suspicion and so don't want to be a party to it.
5. I ask that a copy of this letter be provided to Committee Members, and be forwarded to the Planning Authority.

Yours Faithfully,

Peter R Hennessy

Document 29: SPA Publication from CCC Chairman

Community Consultative Committee Guideline: State Significant Projects (Guideline, January 2019) - Update

Community Consultative Committees are an important means used by the Department to enable ongoing community engagement in the delivery of complex State significant projects. The Departments Community Consultative Guideline is the principle means to provide guidance on the operation and management of Community Consultative Committees.

The Department is looking to update this Guideline to ensure it remains fit for purpose.

The Department has received feedback, since its implementation, on ways in which the Guideline could be improved. This feedback has come from the Department's assessment teams, chairpersons to Community Consultative Committees and community members. Before commencing its review, the Department is seeking to confirm from users if there are other issues or matters that should be considered, beyond what is identified below.

Previous feedback on the Guideline

The previous feedback received is grouped and outlined below, representing sections of the Guideline.

1. Purpose of the community

No feedback has been received to date

2. Establishment of the committee

It has been suggested that clarity is needed for the concept of "best practice" in the context of project community engagement strategies.

3. Members of the committee

The process for selecting and appointing committee members to Community Consultative Committees has received the most comments.

It has been suggested that:

- more flexibility should be allowed for community membership outside the project LGA and that focus should be directed to representation from impacted communities, rather than within a specific boundary

- a review of both the criteria as well as the process for how local community representatives and stakeholder groups appointments should be undertaken, with a view to providing discretion for chairpersons to interview potential representatives if further information is required. This suggestion is aimed at reducing the possibility of appointing individuals who may also be part of a separate community group, potentially leading to over-representation of a particular set of views towards a project.
- a review of the recruitment process and documentation for shortlisting committee members should be undertaken so that potential committee members provide the information required so that chairpersons have sufficient information to undertake a robust assessment to shortlist candidates.
- clarity has been requested as to whether a stakeholder group should have a 'standing position' on the committee, such that if their representative leaves they can be replaced, or is the stakeholder group membership tied to a specific representee
- clarity on whether the recommended council representatives should be an elected member or council staff
- chairpersons should be able to change the date of a single committee meeting if they cannot attend, rather than appoint a new chairperson from the pool (as currently stated)
- it can be difficult to gain community interest and representation for some committees in rural areas. It has been proposed to offer additional reimbursements to community members in situations where the chairperson cannot fill spaces within a committee.

4. **Committee meetings**

Further clarity has been requested around the process of organising and running joint meetings for Community Consultative Committees. Specifically, when they should be required to hold such meetings, either through conditions of consent, Departmental request or at the discretion of chairpersons in the joint committees.

It has also been recommended that the Department consider allocating a representative to attend the first meeting to instruct proceedings, provide a 'sense of authority', and to clarify the roles and responsibilities of chairperson,

committee members and the proponent. Similar feedback suggested considering a requirement for an inception meeting between the Department, the proponent, and the chairperson to establish roles and responsibilities of each party in the committee.

Dispute resolution, including complaint management has been raised as an area of the Guideline that requires a more structured process and guiding material, particularly around committee members who may have a dispute or grievance with the chairperson. Additionally, the code of conduct could be more explicit about unacceptable behaviours of committee members and a detailed process for replacing members if the code is breached.

Committees established at different phases of a project lifecycle (EIS preparation vs post determination of a project) may be quite different in scope. It has been noted that the Department should provide more guidance on convening meetings during these different situations and what different functions or structure the committee should follow, including what information should be available by the proponent. The Guideline should also cover the process for reviewing a committee's effectiveness.

5. **Responsibilities of the proponent**

Some feedback has been received regarding the requirement of publishing information and minutes on the proponent's website. On some occasions the proponent does not publish the material in a timely manner and some proponents have published minutes that is either not easily accessible through their website or may be not be accessed from the website. Consideration should also be given to setting clearer expectations for formatting as well as publishing of meeting minutes or notes.

Disputes have arisen in the past regarding perceptions that proponents have been reluctant to share relevant information about the project with the committee. It has been suggested more guidance may be required to clarify what information is expected to be shared with the committee and when.

6. Communication with the broader community

No feedback has been received to date

General Feedback

General feedback includes suggestions to review the language throughout the Guideline so that more clarify is provided as to when a requirement is suggestive (ie 'should')

and when a requirement is more directive (ie must). This would clarify when requirements are a "must", including how the requirements would be enforced.

There is also a need to update the glossary with more definitions and providing consistency of terms and definitions.

Next steps

Once feedback from users has been received the guideline will be reviewed and redrafted. A draft version of the Guideline will be provided back to users, for consultation. Once feedback on the draft updated Guideline has been considered, the Guideline will be finalised and published on the Department website.

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Document 30: J. R. Mitchell Statutory Declaration

Statutory Declaration

OATHS ACT 1900, NSW, EIGHTH SCHEDULE

I, John Ross Mitchell, 21 Dempsey Street, Peel, in the State of New South Wales, Welder do solemnly and sincerely declare that:

1. For some years before May 2022, I became rather familiar with Brewongle Lane and its surrounds, having travelled from my home to Oberon via Brewongle Lane.

2. Shortly before 18 May 2022 I learned, to the best of my recollection by social media, that there was to be a community information session, to be held at Bathurst Memorial Entertainment Centre (BMEC) on 18 May 2022. The session related to a proposed Solar Plant at 4823 Great Western Highway Glanmire. I decided to attend.

3. On 18 May 2022, I attended BMEC to listen to the session. Before 18 May 2022 I had no contact with the Glanmire Action Group and as at 18 May 2022 as I recall I had not met any member of the Glanmire Action Group or indeed any other person who attended the session on that day.

4. On 18 May I listened to the exchange between the person I came to learn was [redacted] on behalf of Elgin Energy on the one hand, and principally Peter Hennessy, but also Karyn Taylor on behalf of the Glanmire Action Group on the other hand. The speakers on behalf of the Glanmire Action Group appeared to have the full support of the people who were present at the session.

5. I became fascinated with the exchange that occurred between the parties, and in particular, fascinated by the fact that [redacted] appeared to decline to answer any question that was put to him. At a stage I decided to move from towards the back of the room to towards the front, and then asked generally, words to the effect, "*do you mind if I film this and put it on YouTube for those who are not present can see and hear what is going on*".

6. I recall Mr Hennessy saying words to the effect "*not at all, you can certainly film*".

7. I remember [redacted] getting up from his chair and leaving the room.

8. Shortly after that I spoke with the woman who appeared to be with him and who I later came to learn was with NGH Consulting, and said words to the effect, "*where has he gone? What is happening with the meeting*?".

9. She then left the room and returned, but [redacted] did not return. After several minutes I saw the Glanmire Action Group disperse and I also left the premises.

10. I have now been shown a letter headed 'Elgin Energy' dated 15 September 2022, purporting to come from [redacted]. I read in particular paragraph 4 that reads in these terms:-

"*In relation to your comments regarding the community information session at the Bathurst Memorial Entertainment Centre (BMEC) on 18 May 2022 we spent a considerable amount of time with the Action Group answering questions. In our view, once the tone and nature of the questions became unreasonably aggressive and a member of the group began filming without permission, the situation was considered no longer constructive, and we moved away to engage with a Western Advocate Journalist*"

I attach the letter which is marked "A".

11. I say that on my observations:-

a) [redacted] failed to answer any questions put by anyone. He kept repeating "I've already answered that".

b) The tone and nature of the questions was not unreasonably aggressive or aggressive at all.

c) As already stated, I was not, and am not a member of the Glanmire Action Group.

d) I did not begin filming.

e) [redacted] did not "move away" but rather he left the room and did not return.

f) No explanation was given by him, or anyone on his behalf.

and I make this solemn declaration conscientiously believing the same to be true and by virtue of the provisions of the *Oaths Act 1900*.

Declared at: BATHURST on 9 DEC 2022

Robert Mitchell
[signature of declarant]

in the presence of an authorised witness, who states:

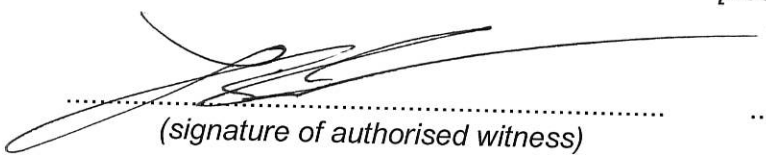
I, JONTY ROBERT DONALD BOSHIER, a SOLICITOR
[name of authorised witness] *[qualification of authorised witness]*

certify the following matters concerning the making of this statutory declaration by the person who made it: *[*please cross out any text that does not apply]*

1. *I saw the face of the person *[OR]**I ~~did not see the face of the person because the person was wearing a face covering, but I am satisfied that the person had a special justification for not removing the covering~~.

2. ~~*I have known the person for at least 12 months *[OR]**~~*I have not known the person for at least 12 months, but I have confirmed the person's identity using an identification document and the document I relied on was DRIVERS LICENSE

[describe identification document relied on]



.....
(signature of authorised witness)

9/12/ 2022
.....
[date]

"A"

ELGIN ENERGY

15 September 2022

223 Liverpool Street,
Darlinghurst, Sydney

RE: Glanmire Solar Farm

Dear Polly,

Thank you for your recent correspondence regarding a request for a meeting with Elgin Energy and the Glanmire Action Group.

We are to hold a meeting in the coming weeks. This meeting is to follow on from recent 'near neighbour' discussions about the proposed site layout and findings from recent assessments. As discussed at our most recent 'near neighbour' meetings, follow up individual discussions are to occur as required to discuss individual areas of interest.

Our next meeting is to continue with, and build upon, our ongoing community consultation with the Action Group and its members, including:

- A meeting at the home of Peter Hennessy with Action Group members (prior to its formation);
- A drop-in day at the site of the Solar Farm over two days where we had detailed discussions with many Action Group members;
- The Royal Bathurst Show – where Elgin Energy had a stall over two days and met with members of the Action Group. Peter Hennessy also attended and provided us with a list people who had concerns with the Project at this time;
- A six hour Community Information Drop-in Session at Bathurst Memorial Entertainment Centre (BMEC) on 18th May – which was attended by several Action Group members and involved discussion;
- Members of the Action Group were invited to each CCC meeting and attended the first two (of four) meetings. Unfortunately, no members attended the last two meetings which involved DPE and other expert consultants. These meetings went for three hours (or more) and provided opportunity for detailed consultation on the Project and provided a constructive space to raise specific concerns. CCC minutes were provided to the Action Group as requested; and
- Where the Project Team has been provided with contact details, letters have been delivered, and phone call and email conversations have been held with members of the Action Group.

In relation to your comments regarding the Community Information Session at Bathurst Memorial Entertainment Centre (BMEC) on 18 May 2022, we spent a considerable amount of time with the Action Group answering questions. In our view, once the tone and the nature of the questions became unreasonably aggressive and a member from the group began filming without permission, the situation was considered no longer constructive, and we moved away to engage with a Western Advocate Journalist.

The Project Team were at BMEC until 6:00pm on 18 May 2022, meeting members of the public and other members of the Action Group, including 'near neighbours'. We confirm that conversations,

questions, and concerns were recorded and overall, we found the information session to be valuable. We remain happy to consult with anyone in relation to the Project.

As highlighted above, we will be in touch to confirm a date for our next meeting. We are currently seeking an independent party to chair this meeting. At this stage the likely venue will be BMEC, in the conference meeting room where the CCC meetings took place.

We will be in touch via email to arrange a time as soon as details are confirmed.

Should you have any questions in the meantime, please give [redacted] from NGH a call on [redacted], or email engage@nghengage.com.au

Kind regards,

Tim Averill
General Manager – Australia
Elgin Energy

Document 31: Communication on Co-Chair Agreement

From: glanmireactiongroup@hotmail.com
Sent: Friday, 14 October 2022 4:31 PM
To: breannah.j@nghconsulting.com.au
Subject: meeting

Good afternoon [redacted]

Thank you for your email 13th October; you no doubt realise the term 'by mutual agreement' has been ignored by you. This is, and has been, the route of the problem. As stated in my email 10thOctober, the 20th October at 6pm is a suitable time and date for our group to attend. How easily this could have been arranged had the date been agreed upon, mutually.

We will do our best to limit numbers in attendance at the 20th October meeting. I see Mr West is committed to contacting our group. We will be pleased to meet with him in advance of the meeting, and thereafter will advise upon our agreement or otherwise to him chairing the 20th October meeting.
I ask Mr West to contact Karyn Taylor with a view to arranging a mutually satisfactory time and place to meet.

Karyn's details are as follows:

Karyn Taylor
M: 0427887149
karyn@goindigo.com.au

Kind Regards,
Polly Bonanno
On Behalf of the Glanmire Action Group

From: glanmireactiongroup@hotmail.com
Sent: Friday, 14 October 2022 10:11 PM
To: breannah.j@nghconsulting.com.au
Subject: meeting

Good afternoon [redacted],

Further to my earlier email 14th October, responding to your email dated 13th October, the Glanmire Action Group asks for a co-chair for the 20th October meeting, in the interest of balance, so that the group and Elgin Energy are not taken by surprise and there are no last-minute objections to the way the community consultation meeting is conducted. As with previously, we put forward Mr Michael Schwab as co-chair and invite Mr West to work with Mr Schwab to moderate the interests of all in attendance at the 20th October meeting.

Kind Regards,
Polly Bonanno
On Behalf of Glanmire Action Group

From: glanmireactiongroup@hotmail.com
Sent: Saturday, 15 October 2022 9:48 AM
To: peter_hennessy@hotmail.com
Subject: FW: meeting

Sent from Mail for Windows

From: glanmireactiongroup@hotmail.com
Sent: Friday, 14 October 2022 4:31 PM
To: breannah.j@nghconsulting.com.au
Subject: meeting

Good afternoon [redacted]

Thank you for your email 13th October; you no doubt realise the term 'by mutual agreement' has been ignored by you. This is, and has been, the route of the problem. As stated in my email 10thOctober, the 20th October at 6pm is a suitable time and date for our group to attend. How easily this could have been arranged had the date been agreed upon, mutually.

We will do our best to limit numbers in attendance at the 20th October meeting. I see Mr West is committed to contacting our group. We will be pleased to meet with him in advance of the meeting, and thereafter will advise upon our agreement or otherwise to him chairing the 20th October meeting.
I ask Mr West to contact Karyn Taylor with a view to arranging a mutually satisfactory time and place to meet.

Karyn's details are as follows:

Karyn Taylor
M: 0427887149
karyn@goindigo.com.au

Kind Regards,
Polly Bonanno
On Behalf of the Glanmire Action Group

From: glanmireactiongroup@hotmail.com
Sent: Monday, 17 October 2022 6:29 AM
To: breannah.j@nghconsulting.com.au
Subject: meeting

Hi [redacted]

I refer to my email of 14th October, and in particular, the last paragraph.
I have now ascertained that Mr Michael Schwab is available at 6.00pm on 20th October to co-chair this proposed meeting.
Co-chairs enable me to agree to the meeting, and avoid the need for Mr West to meet with our group representative, before we agree to him chairing the proposed meeting-a course demeaning to Mr West and caused by your unilateral action.
The appropriate course now is for Mr West and Mr Schwab to confer, and the co-chairs fix upon a way forward. Mr Schwab is of course educated in, and has practised in mediation and so is well familiar with procedures.
If the Chairs wish to meet with a group representative before 20th October, I will arrange.
If the above is not acceptable to you, please advise with a view to saving all persons expense and inconvenience.

Kind Regards,
Polly Bonanno
On Behalf of the Glanmire Action Group

From: [redacted]
Sent: Monday, 17 October 2022 5:45 PM
To: glanmireactiongroup@hotmail.com
Subject: RE: meeting

Good Afternoon Polly,

Thank you for your emails on Friday 14th October and today, Monday 17th October.

We are pleased to hear that the Glanmire Action Group is available for a meeting on Thursday 20th October at KeyStone 1889 from 6:00pm.

Thank you for sending through details of Karyn Taylor from Indigo. Mr West is able to contact Karyn so they can both discuss and agree on how the meeting will run best.

We believe that a second chair for this meeting is unnecessary. As discussed, Mr West is from the pool of independent chairs associated with the NSW Department of Planning and Environment and has chaired many meetings in relation to State Significant Developments. An independent chair with this type of experience was agreed to by you in previous correspondence in September and gives the best opportunity for meaningful and constructive discussion. We are more than happy to extend the invite for Mr Schwab to attend the meeting, but not as a second chair.

Elgin Energy and NGH representatives will be at KeyStone 1889 on Thursday night, prepared to share information and answer your questions in relation to the Glanmire Solar Farm, which is the key objective of this engagement.

Should you have any further questions, please don't hesitate to contact me.

We look forward to meeting with you on Thursday.

Kind regards,

[redacted]

[redacted]
COMMUNICATIONS & ENGAGEMENT LEAD

[redacted]
35 Kincaid St
(PO Box 5464) Wagga Wagga NSW 2650

NGH

30 YEARS

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WWW.NGHCONSULTING.COM.AU

NGH acknowledges that we work on the traditional lands of First Nations people across Australia and recognises the enduring connection to the land. We pay our respects to elders, past present and emerging.

From: glanmireactiongroup@hotmail.com <glanmireactiongroup@hotmail.com>
Sent: Monday, 17 October 2022 6:30 AM
To: [redacted]
Subject: meeting

[redacted]

I refer to my email of 14th October, and in particular, the last paragraph.
I have now ascertained that Mr Michael Schwab is available at 6.00pm on 20th October to co-chair this proposed meeting.
Co-chairs enable me to agree to the meeting, and avoid the need for Mr West to meet with our group representative, before we agree to him chairing the proposed meeting-a course demeaning to Mr West and caused by your unilateral action.
The appropriate course now is for Mr West and Mr Schwab to confer, and the co-chairs fix upon a way forward. Mr Schwab is of course educated in, and has practised in mediation and so is well familiar with procedures.
If the Chairs wish to meet with a group representative before 20th October, I will arrange.
If the above is not acceptable to you, please advise with a view to saving all persons expense and inconvenience.

Kind Regards,
Polly Bonanno
On Behalf of the Glanmire Action Group

From: [redacted]
Sent: Wednesday, 19 October 2022 3:12 PM
To: glanmireactiongroup@hotmail.com
Subject: RE: meeting

Hi Polly,

Thank you for your email and sending through the contact details of Mr Schwab.

I have passed on his details to Mr West, and I will email you shortly after they have had a conversation with next steps.

Kind regards,

[redacted]

[redacted]

35 Kincaid St
(PO Box 5464) Wagga Wagga NSW 2650

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WWW.NGHCONSULTING.COM.AU

NGH acknowledges that we work on the traditional lands of First Nations people across Australia and recognises the enduring connection to the land. We pay our respects to elders, past present and emerging.

From: glanmireactiongroup@hotmail.com <glanmireactiongroup@hotmail.com>
Sent: Wednesday, 19 October 2022 12:20 PM
To: [redacted]
Subject: RE: meeting

Hello [redacted]

Thank you for your email 18th October. Glanmire Action Group has also made substantial effort to be accommodating to ensure this meeting proceeds.

Michael Schwab's contact details are as follows:
Ph: 6331 1533
mschwab@mcmc.com.au

I am unable at the moment to give you the names of the group members attending.

We look forward to our meeting on Thursday.

Kind Regards,

Polly Bonanno
On Behalf of the Glanmire Action Group

From: [redacted]
Sent: Tuesday, 18 October 2022 5:49 PM
To: glanmireactiongroup@hotmail.com
Subject: RE: meeting

Hi Polly,

Thank you for your email. Elgin Energy has made a substantial effort to be accommodating to ensure this meeting proceeds.

We understand that the Action Group is not prepared to attend the meeting on Thursday night with the independent chair we have provided. We are willing to allow Mr Schwab to co-chair the meeting with Mr West, on the condition that both chairs have a constructive conversation tomorrow.

If you could please provide contact details for Mr Schwab so that we can provide them to Mr West as soon as possible that would be appreciated. Mr West will then contact him tomorrow to discuss and agree on a meeting structure, protocols, roles and responsibilities.

In the meantime, can you also please forward a list of members who will be attending.

We look forward to seeing you on Thursday.

Kind regards,

[redacted]

[redacted]

[redacted]

35 Kincaid St
(PO Box 5464) Wagga Wagga NSW 2650

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WWW.NGHCONSULTING.COM.AU

NGH acknowledges that we work on the traditional lands of First Nations people across Australia and recognises the enduring connection to the land. We pay our respects to elders, past present and emerging.

From: glanmireactiongroup@hotmail.com <glanmireactiongroup@hotmail.com>
Sent: Tuesday, 18 October 2022 12:40 PM
To: [redacted]
Subject: meeting

Dear [redacted]

Your email of 17th October continues the theme of your last few emails. It is in direct conflict with the agreement I reached with you, of fixing a mutually convenient date and mutually agreed Chairperson

I sought to overcome the impasse with joint Chairs. Good sense should have prevailed. It follows your proposal in your email is rejected. The self interested expression,'we believe that a second Chair for this meeting is unnecessary', disregards what our group, 'believes', and disregards what is 'desirable.'

Of course our distrust of Elgin is well based. The process of consultation continues to be foreign to it.

By illustration, I refer to [redacted]-Elgin letter of 15 September 22, upon which he seeks to rely for 'community consultation.'

A) Bullet point 1 was specifically agreed to be, 'without prejudice', to any process. Though uninformative, it was irrelevant to the process. He appears to disregard, 'without prejudice'

B) Bullet points 2 and 3 were not Community Consultations. Mr Hennessy provided no list. I provided a list of objections. No Community consultation occurred.

C) Bullet point 4. Several of our Group attended, during working hours, at inconvenience. [redacted] vacated the meeting room, shortly thereafter, and failed to return. You, [redacted] agreed to report that [redacted],'aborted', the meeting.

D) Bullet point 5. The CCC meeting was a disgrace. Our principal objections were set out in writing, and forwarded to the Chairman. No response addressing issues was received, but the Chairman forwarded a Planning Authority publication, detailing widespread discontent with the CCC process. The Community was kept out. We are determined to have a fair and open consultation, or none at all. We will no longer be a party to, 'box ticking'

E) Bullet point 6. The Project Team probably has been provided with very few contact details, because there has been no Community consultation or meeting, or contact or communication. My advice has been that people have received postal communication of an event, after it has occurred.

As to the 5th last paragraph of [redacted] letter, it is simply false. 1) [redacted] neither answered nor purported to answer questions. 2) The person alleged to be filming, was not a member of our Group. As far as I am aware, no member of our Group, knew him. 3) The person was not filming. He asked Mr Averill for permission to film. 4) Mr Averill did not, 'move away', but rather, he vacated the room and did not return. You [redacted] appeared to confer with him and return to the room, and agreed to report that [redacted] 'aborted' the meeting.

So you see, in just one paragraph, the Project Proponent achieved four seriously incorrect, but self serving errors.

In the 3rd last paragraph of [redacted]'s letter, he reports a course that appears to be at odds with the, 'mutually agreed ' course that I had with you, [redacted]. Certainly, disregard for the arrangement with you, [redacted]NGH), commenced after 15th September.

A truly independent and competent forum, quite unlike the CCC is necessary.

We remain prepared to meet.

From: glanmireactiongroup@hotmail.com
Sent: Wednesday, 19 October 2022 12:19 PM
To: [redacted]
Subject: RE: meeting

Hello [redacted],

Thank you for your email 18th October. Glanmire Action Group has also made substantial effort to be accommodating to ensure this meeting proceeds.

Michael Schwab's contact details are as follows:
Ph: 6331 1533
mschwab@mcmc.com.au

I am unable at the moment to give you the names of the group members attending.

We look forward to our meeting on Thursday.

Kind Regards,
Polly Bonanno
On Behalf of the Glanmire Action Group

From: [redacted]
Sent: Tuesday, 18 October 2022 5:49 PM
To: glanmireactiongroup@hotmail.com
Subject: RE: meeting

Hi Polly,

Thank you for your email. Elgin Energy has made a substantial effort to be accommodating to ensure this meeting proceeds.

We understand that the Action Group is not prepared to attend the meeting on Thursday night with the independent chair we have provided. We are willing to allow Mr Schwab to co-chair the meeting with Mr West, on the condition that both chairs have a constructive conversation tomorrow.

If you could please provide contact details for Mr Schwab so that we can provide them to Mr West as soon as possible that would be appreciated. Mr West will then contact him tomorrow to discuss and agree on a meeting structure, protocols, roles and responsibilities.

In the meantime, can you also please forward a list of members who will be attending.

We look forward to seeing you on Thursday.

Kind regards,

[redacted]

Document 32: M. Ryan, Experience

Glanmire Solar Plant EIS Clarification
Bathurst Show April 2022

I Mark Ryan (name) of 5018 Gt Western Hwy Glanmire (address).
Farmer, say

1. I attended the Bathurst Show on 29/30 April 2022.
2. I ~~with~~ Did not attended Elgin's Stall.
3. I advised my clear opposition to the subject proposal ~~as did those who were with me~~. at the open day at Woodside.
4. I wish to make the following additional comments:
~~If was amazed the proponent chose this site for a solar farm. I told the proponent that this property was prime agricultural land and it was wrong to put a solar farm there.~~

Signed: M a Ryan

Dated: 6 / 12 / 2022

I provided him with more information about the land. Next I learnt that Elgin had got soil tests to try to contradict what I had said. If I went to there stall at the show I believed they would used what I said to there advantage. I leased this land for approximately 16 years. from the late 1980s to the early 2000s. I can say that this land was equal

to any other land I farmed and better than most. I harvested in excess of 500 ton of wheat off "woodside" in 1996. being the crop sown winter 1995.

M a Ryan

6/12/22.

Document 33: Statement from Near Neighbours

Glanmire Solar Plant EIS Clarification
Near Neighbour Consultation

I Virginia Hennessy of 461 Brewonge Lane Glanmire
(name) (address)

Teachers Aide, say
(occupation)

1. I reside approximately 2.1 kilometres from the subject site;

2. I note the contents of the proponents EIS, in particular pages 72 and 73 "Near Neighbour Consultation" sections 1, 2 and 3;

3. ~~I was a signatory to the Glanmire Action Groups "petition". I have now been shown a~~ bundle of documents and identified document now marked ___ as signed by ~~me.~~

   Before signing the document, I was shown the Proponents brochure and the Glanmire Action Group's brochure.

   I was given ample opportunity to consider all aspects that I wanted to consider and thereafter signed the document.

   I am informed there is a suggestion the document was 'generic', whatever that term means in the context in which it was stated it ought not distract from my earnest ~~consideration of the document I signed.~~

4. I remain opposed to the Solar Proposal.

5. I say I have/ have not (circle appropriate) been contacted by Elgin or anyone on its behalf by letter, phone call, email, personally or otherwise, enquiring as to my opinion on solar/ renewables in particular at the subject location. If I had been so contacted I would have expressed my clear opposition to it at this site.

6. I wish to make the following additional comments:

   _____
   _____
   _____
   _____

Signed: _____

Dated: 2 / 12 / 2022

Glanmire Solar Plant EIS Clarification
Near Neighbour Consultation

I Sally Newton-Clandler 1939 O'Connell Rd, O'Connell
(name) (address)
Grazier, say
(occupation)

1. I ~~resides~~ own property approximately 0 kilometres from the subject site;

2. I note the contents of the proponents EIS, in particular pages 72 and 73 "Near Neighbour Consultation" sections 1, 2 and 3;

3. I was a signatory to the Glanmire Action Groups "petition". I have now been shown a bundle of documents and identified document now marked N86 as signed by me.

   Before signing the document, I was shown the Proponents brochure and the Glanmire Action Group's brochure.

   I was given ample opportunity to consider all aspects that I wanted to consider and thereafter signed the document.

   I am informed there is a suggestion the document was 'generic', whatever that term means in the context in which it was stated it ought not distract from my earnest consideration of the document I signed.

4. I remain opposed to the Solar Proposal.

5. I say I have/ have not (circle appropriate) been contacted by Elgin or anyone on its behalf by letter, phone call, email, personally or otherwise, enquiring as to my opinion on solar/ renewables in particular at the subject location. If I had been so contacted I would have expressed my clear opposition to it at this site.

6. I wish to make the following additional comments:

(1) I AM STILL WAITING TO BE SHOWN RESULTS OF VISUAL IMPACT ASSESSMENTS ON SITES ON MY PROPERTY
(2) I AM STILL WAITING TO BE CONTACTED BY ELGIN'S VISUAL IMPACT CONSULTANT REGARDING PROMISED FACE TO FACE MEETINGS
(3) I AM STILL WAITING ON INFORMATION REQUESTED FROM NGH ON HYDROLOGY MATTERS.
(4) I AM STILL WAITING ON REPLY FROM ELGIN REGARDING HEAT ISLAND EFFECT.

Signed: Sally Newton-Clandler

Dated: 10/ 12 / 2022

Glanmire Solar Plant EIS Clarification
Near Neighbour Consultation

I Martin Stark (name) of 4660 Great Western Hwy (address),
Farmer - Sheep (occupation), say

1. I reside approximately 1 kilometres from the subject site;

2. I note the contents of the proponents EIS, in particular pages 72 and 73 "Near Neighbour Consultation" sections 1, 2 and 3;

3. I was a signatory to the Glanmire Action Groups "petition". I have now been shown a bundle of documents and identified document now marked R47 as signed by me.

   Before signing the document, I was shown the Proponents brochure and the Glanmire Action Group's brochure.

   I was given ample opportunity to consider all aspects that I wanted to consider and thereafter signed the document.

   I am informed there is a suggestion the document was 'generic', whatever that term means in the context in which it was stated it ought not distract from my earnest consideration of the document I signed.

4. I remain opposed to the Solar Proposal.

5. I say I have/ have not (circle appropriate) been contacted by Elgin or anyone on its behalf by letter, phone call, email, personally or otherwise, enquiring as to my opinion on solar/ renewables in particular at the subject location. If I had been so contacted I would have expressed my clear opposition to it at this site.

6. I wish to make the following additional comments:
   I have been contacted by Elgin in regards to the visual impact of the project. At no point was I asked about the suitability of its location.

Signed:

Dated: 12 / 12 / 2022

Glanmire Solar Plant EIS Clarification
Near Neighbour Consultation

I Melissa Stait (name) of 4660 Great western Hwy (address),
Primary Teacher (occupation), say

1. I reside approximately 1 kilometres from the subject site;

2. I note the contents of the proponents EIS, in particular pages 72 and 73 "Near Neighbour Consultation" sections 1, 2 and 3;

3. I was a signatory to the Glanmire Action Groups "petition". I have now been shown a bundle of documents and identified document now marked RS as signed by me.

   Before signing the document, I was shown the Proponents brochure and the Glanmire Action Group's brochure.

   I was given ample opportunity to consider all aspects that I wanted to consider and thereafter signed the document.

   I am informed there is a suggestion the document was 'generic', whatever that term means in the context in which it was stated it ought not distract from my earnest consideration of the document I signed.

4. I remain opposed to the Solar Proposal.

5. I say I have/have not (circle appropriate) been contacted by Elgin or anyone on its behalf by letter, phone call, email, personally or otherwise, enquiring as to my opinion on solar/renewables in particular at the subject location. If I had been so contacted I would have expressed my clear opposition to it at this site.

6. I wish to make the following additional comments:

   _____
   _____
   _____
   _____

Signed: _____

Dated: 11 / 12 / 2022

Glanmire Solar Plant EIS Clarification
Near Neighbour Consultation

I PATRICK PICKETT of 64 MERSING RD, GLANMIRE 2730
(name) (address)

_____, say
(occupation)

1. I reside approximately 1 kilometres from the subject site;

2. I note the contents of the proponents EIS, in particular pages 72 and 73 "Near Neighbour Consultation" sections 1, 2 and 3; M15

3. I was a signatory to the Glanmire Action Groups "petition". I have now been shown a bundle of documents and identified document now marked M15 as signed by me.

   Before signing the document, I was shown the Proponents brochure and the Glanmire Action Group's brochure.

   I was given ample opportunity to consider all aspects that I wanted to consider and thereafter signed the document.

   I am informed there is a suggestion the document was 'generic', whatever that term means in the context in which it was stated it ought not distract from my earnest consideration of the document I signed.

4. I remain opposed to the Solar Proposal.

5. I say I have/~~have not~~ (circle appropriate) been contacted by Elgin or anyone on its behalf by letter, phone call, email, personally or otherwise, enquiring as to my opinion on solar/ renewables in particular at the subject location. If I had been so contacted I would have expressed my clear opposition to it at this site.

6. I wish to make the following additional comments:

   _____
   _____
   _____
   _____

Signed: _____

Dated: 12 / 12 / 2022

Glanmire Solar Plant EIS Clarification
Near Neighbour Consultation

I TANYA ROSE of 64 MERSING RD, GLANMIRE 2795
(name) (address)

_____, say
(occupation)

1. I reside approximately 1 kilometres from the subject site;

2. I note the contents of the proponents EIS, in particular pages 72 and 73 "Near Neighbour Consultation" sections 1, 2 and 3; M12

3. I was a signatory to the Glanmire Action Groups "petition". I have now been shown a bundle of documents and identified document now marked M12 as signed by me.

   Before signing the document, I was shown the Proponents brochure and the Glanmire Action Group's brochure.

   I was given ample opportunity to consider all aspects that I wanted to consider and thereafter signed the document.

   I am informed there is a suggestion the document was 'generic', whatever that term means in the context in which it was stated it ought not distract from my earnest consideration of the document I signed.

4. I remain opposed to the Solar Proposal.

5. I say I have/ have not (circle appropriate) been contacted by Elgin or anyone on its behalf by letter, phone call, email, personally or otherwise, enquiring as to my opinion on solar/ renewables in particular at the subject location. If I had been so contacted I would have expressed my clear opposition to it at this site.

6. I wish to make the following additional comments:

   _____
   _____
   _____
   _____

Signed: Tanya Rose

Dated: 12 / 12 / 2022

Glanmire Solar Plant EIS Clarification
Near Neighbour Consultation

I Mark Ryan (name) of 5018 Gt Western Hwy Glanmire (address)

Farmer (occupation), say

1. I reside approximately 2 kilometres from the subject site;

2. I note the contents of the proponents EIS, in particular pages 72 and 73 "Near Neighbour Consultation" sections 1, 2 and 3;

3. I was a signatory to the Glanmire Action Groups "petition". I have now been shown a bundle of documents and identified document now marked ___ as signed by me.

   Before signing the document, I was shown the Proponents brochure and the Glanmire Action Group's brochure.

   I was given ample opportunity to consider all aspects that I wanted to consider and thereafter signed the document.

   I am informed there is a suggestion the document was 'generic', whatever that term means in the context in which it was stated it ought not distract from my earnest consideration of the document I signed.

4. I remain opposed to the Solar Proposal.

5. I say ~~I have~~ have not (circle appropriate) been contacted by Elgin or anyone on its behalf by letter, phone call, email, personally or otherwise, enquiring as to my opinion on solar/ renewables in particular at the subject location. If I had been so contacted I would have expressed my clear opposition to it at this site.

6. I wish to make the following additional comments: No one from Elgin visited my place re this proposal.

Signed: M a Ryan

Dated: 6 / 12 / 2022

Glanmire Solar Plant EIS Clarification
Near Neighbour Consultation

I PAUL RYAN (name) of 5074 GREAT WESTERN HIGHWAY (address)
GLANMIRE (FARMER) (occupation), say

1. I reside approximately 2 kilometres from the subject site;

2. I note the contents of the proponents EIS, in particular pages 72 and 73 "Near Neighbour Consultation" sections 1, 2 and 3;

3. I was a signatory to the Glanmire Action Groups "petition". I have now been shown a bundle of documents and identified document now marked ___ as signed by me.

   Before signing the document, I was shown the Proponents brochure and the Glanmire Action Group's brochure.

   I was given ample opportunity to consider all aspects that I wanted to consider and thereafter signed the document.

   I am informed there is a suggestion the document was 'generic', whatever that term means in the context in which it was stated it ought not distract from my earnest consideration of the document I signed.

4. I remain opposed to the Solar Proposal.

5. I say I have/ have not (circle appropriate) been contacted by Elgin or anyone on its behalf by ~~letter, phone~~ call, email, personally or otherwise, enquiring as to my opinion on solar/ renewables in particular at the subject location. If I had been so contacted I would have expressed my clear opposition to it at this site.

6. I wish to make the following additional comments:

   _____
   _____
   _____
   _____

Signed: _____

Dated: 8 / 12 / 2022

Glanmire Solar Plant EIS Clarification
Near Neighbour Consultation

I Andrew Petch. of 264 Brewongle Lane, Glanmire.
(name) (address)
former / Truck Driver, say
(occupation)

1. I reside approximately Neighbour kilometres from the subject site;

2. I note the contents of the proponents EIS, in particular pages 72 and 73 "Near Neighbour Consultation" sections 1, 2 and 3;

3. I was a signatory to the Glanmire Action Groups "petition". I have now been shown a bundle of documents and identified document now marked R81 as signed by me.

   Before signing the document, I was shown the Proponents brochure and the Glanmire Action Group's brochure.

   I was given ample opportunity to consider all aspects that I wanted to consider and thereafter signed the document.

   I am informed there is a suggestion the document was 'generic', whatever that term means in the context in which it was stated it ought not distract from my earnest consideration of the document I signed.

4. I remain opposed to the Solar Proposal.

5. I say I have/ have not (circle appropriate) been contacted by Elgin or anyone on its behalf by letter, phone call, email, personally or otherwise, enquiring as to my opinion on solar/ renewables in particular at the subject location. If I had been so contacted I would have expressed my clear opposition to it at this site.

6. I wish to make the following additional comments:

Signed: Andrew Petch

Dated: 6 / 12 / 2022

Glanmire Solar Plant EIS Clarification
Near Neighbour Consultation

I Joanne Petch of 264 Brentogle Lane, Glanmire
(name) (address)
legal Secretary., say
(occupation)

(Neighbour)

1. I reside approximately 0 kilometres from the subject site;

2. I note the contents of the proponents EIS, in particular pages 72 and 73 "Near Neighbour Consultation" sections 1, 2 and 3;

3. I was a signatory to the Glanmire Action Groups "petition". I have now been shown a bundle of documents and identified document now marked N85 as signed by me.

   Before signing the document, I was shown the Proponents brochure and the Glanmire Action Group's brochure.

   I was given ample opportunity to consider all aspects that I wanted to consider and thereafter signed the document.

   I am informed there is a suggestion the document was 'generic', whatever that term means in the context in which it was stated it ought not distract from my earnest consideration of the document I signed.

4. I remain opposed to the Solar Proposal.

5. I say I have/ have not (circle appropriate) been contacted by Elgin or anyone on its behalf by letter, phone call, email, personally or otherwise, enquiring as to my opinion on solar/ renewables in particular at the subject location. If I had been so contacted I would have expressed my clear opposition to it at this site.

6. I wish to make the following additional comments:

   _____
   _____
   _____
   _____

Signed: _____

Dated: 7 / 12 / 2022

Glanmire Solar Plant EIS Clarification
Near Neighbour Consultation

I Peter Jones (name) of 232 Mersing Road, Glanmire, (address)
NSW, 2795 (occupation), say

1. I reside approximately 3 kilometres from the subject site;

2. I note the contents of the proponents EIS, in particular pages 72 and 73 "Near Neighbour Consultation" sections 1, 2 and 3;

3. I was a signatory to the Glanmire Action Groups "petition". I have now been shown a bundle of documents and identified document now marked M7 as signed by me.

   Before signing the document, I was shown the Proponents brochure and the Glanmire Action Group's brochure.

   I was given ample opportunity to consider all aspects that I wanted to consider and thereafter signed the document.

   I am informed there is a suggestion the document was 'generic', whatever that term means in the context in which it was stated it ought not distract from my earnest consideration of the document I signed.

4. I remain opposed to the Solar Proposal.

5. I say [redacted]/ have not (circle appropriate) been contacted by Elgin or anyone on its behalf by letter, phone call, email, personally or otherwise, enquiring as to my opinion on solar/ renewables in particular at the subject location. If I had been so contacted I would have expressed my clear opposition to it at this site.

6. I wish to make the following additional comments: objections, Development is in wrong location, Aesthetics of area negatively impacted. prime agricultural land turned into an industrial site. potential for EMF radiation.

Signed: [signature]

Dated: 07 / 12 / 2022

Glanmire Solar Plant EIS Clarification
Near Neighbour Consultation

I JEFFERY GRABHAM of 18 GLANMIRE LANE GRABHAM
(name) (address)
TRANSPORT TRUCK DRIVER Ray
(occupation)

1. I reside approximately ONE kilometres from the subject site;

2. I note the contents of the proponents EIS, in particular pages 72 and 73 "Near Neighbour Consultation" sections 1, 2 and 3;

3. I was a signatory to the Glanmire Action Groups "petition". I have now been shown a bundle of documents and identified document now marked H101 as signed by me.

   Before signing the document, I was shown the Proponents brochure and the Glanmire Action Group's brochure.

   I was given ample opportunity to consider all aspects that I wanted to consider and thereafter signed the document.

   I am informed there is a suggestion the document was 'generic', whatever that term means in the context in which it was stated it ought not distract from my earnest consideration of the document I signed.

4. I remain opposed to the Solar Proposal.

5. I say I have/(have not) (circle appropriate) been contacted by Elgin or anyone on its behalf by letter, phone call, email, personally or otherwise, enquiring as to my opinion on solar/ renewables in particular at the subject location. If I had been so contacted I would have expressed my clear opposition to it at this site.

6. I wish to make the following additional comments:

   _____
   _____
   _____
   _____

Signed: _____

Dated: 6 / 12 / 2022

Glanmire Solar Plant EIS Clarification
Near Neighbour Consultation

I WRIGHT (name) of 321 MERSING RD (address) GLANMIRE, NSW
RETIRED (occupation), say

1. I reside approximately 3 kilometres from the subject site;

2. I note the contents of the proponents EIS, in particular pages 72 and 73 "Near Neighbour Consultation" sections 1, 2 and 3;

3. I was a signatory to the Glanmire Action Groups "petition". I have now been shown a bundle of documents and identified document now marked M19 as signed by me.

   Before signing the document, I was shown the Proponents brochure and the Glanmire Action Group's brochure.

   I was given ample opportunity to consider all aspects that I wanted to consider and thereafter signed the document.

   I am informed there is a suggestion the document was 'generic', whatever that term means in the context in which it was stated it ought not distract from my earnest consideration of the document I signed.

4. I remain opposed to the Solar Proposal.

5. I say I have/ have not (circle appropriate) been contacted by Elgin or anyone on its behalf by letter, phone call, email, personally or otherwise, enquiring as to my opinion on solar/ renewables in particular at the subject location. If I had been so contacted I would have expressed my clear opposition to it at this site.

6. I wish to make the following additional comments:
   I WAS NEVER ASKED WHAT MY OPINION ON SOLAR AT THE GLANMIRE SITE

Signed: [signature]

Dated: ___ / 12 / 2022

Glanmire Solar Plant EIS Clarification
Near Neighbour Consultation

I Arthur R. Long of 287 Mersing Rd Glanmire
(name) (address)
Retired, say
(occupation)

1. I reside approximately 3 kilometres from the subject site;

2. I note the contents of the proponents EIS, in particular pages 72 and 73 "Near Neighbour Consultation" sections 1, 2 and 3;

3. I was a signatory to the Glanmire Action Groups "petition". I have now been shown a bundle of documents and identified document now marked M5 as signed by me.

   Before signing the document, I was shown the Proponents brochure and the Glanmire Action Group's brochure.

   I was given ample opportunity to consider all aspects that I wanted to consider and thereafter signed the document.

   I am informed there is a suggestion the document was 'generic', whatever that term means in the context in which it was stated it ought not distract from my earnest consideration of the document I signed.

4. I remain opposed to the Solar Proposal.

5. I say I have/ have not (circle appropriate) been contacted by Elgin or anyone on its behalf by letter, phone call, email, personally or otherwise, enquiring as to my opinion on solar/ renewables in particular at the subject location. If I had been so contacted I would have expressed my clear opposition to it at this site.

6. I wish to make the following additional comments:

   _____
   _____
   _____
   _____

Signed: A. R. Long

Dated: ___ / 12 / 2022

Glanmire Solar Plant EIS Clarification
Near Neighbour Consultation

I David Wright of 224 Mersing Rd. Glanmire
(name) (address)
Registered Nurse, say
(occupation)

1. I reside approximately 3 kilometres from the subject site;

2. I note the contents of the proponents EIS, in particular pages 72 and 73 "Near Neighbour Consultation" sections 1, 2 and 3;

3. I was a signatory to the Glanmire Action Groups "petition". I have now been shown a bundle of documents and identified document now marked MJ as signed by me.

   Before signing the document, I was shown the Proponents brochure and the Glanmire Action Group's brochure.

   I was given ample opportunity to consider all aspects that I wanted to consider and thereafter signed the document.

   I am informed there is a suggestion the document was 'generic', whatever that term means in the context in which it was stated it ought not distract from my earnest consideration of the document I signed.

4. I remain opposed to the Solar Proposal.

5. I say (I have) / have not (circle appropriate) been contacted by Elgin or anyone on its behalf by letter, phone call, email, personally or otherwise, enquiring as to my opinion on solar/ renewables in particular at the subject location. If I had been so contacted I would have expressed my clear opposition to it at this site.

6. I wish to make the following additional comments:
   It appears that more consideration for the impacts of this proposal on the neighbouring landholders should be appropriate

Signed: D Wright

Dated: 5 / 12 / 2022

Glanmire Solar Plant EIS Clarification
Near Neighbour Consultation

I Robert Hawkey (name) of 136 marsing Road Glanmire (address),
Truck Driver — Farm Care taker (occupation), say

1. I reside approximately 2 kilometres from the subject site;

2. I note the contents of the proponents EIS, in particular pages 72 and 73 "Near Neighbour Consultation" sections 1, 2 and 3;

3. I was a signatory to the Glanmire Action Groups "petition". I have now been shown a bundle of documents and identified document now marked M3 as signed by me.

   Before signing the document, I was shown the Proponents brochure and the Glanmire Action Group's brochure.

   I was given ample opportunity to consider all aspects that I wanted to consider and thereafter signed the document.

   I am informed there is a suggestion the document was 'generic', whatever that term means in the context in which it was stated it ought not distract from my earnest consideration of the document I signed.

4. I remain opposed to the Solar Proposal.

5. I say I have/ have not (circle appropriate) been contacted by Elgin or anyone on its behalf by letter, phone call, email, personally or otherwise, enquiring as to my opinion on solar/ renewables in particular at the subject location. If I had been so contacted I would have expressed my clear opposition to it at this site.

6. I wish to make the following additional comments:
   I R. HAWKEY Have not had any Contact at all From the company of the Solar enterprise ELGIN At all

Signed: [signature]

Dated: 6 / 12 / 2022

Glanmire Solar Plant EIS Clarification
Near Neighbour Consultation

I Robyn Garment (name) of 4657 Great Western Highway Bathurst (address)
Retired farmer (occupation) say

1. I reside approximately 1 kilometres from the subject site;

2. I note the contents of the proponents EIS, in particular pages 72 and 73 "Near Neighbour Consultation" sections 1, 2 and 3;

3. I was a signatory to the Glanmire Action Groups "petition". I have now been shown a bundle of documents and identified document now marked H100 as signed by me.

   Before signing the document, I was shown the Proponents brochure and the Glanmire Action Group's brochure.

   I was given ample opportunity to consider all aspects that I wanted to consider and thereafter signed the document.

   I am informed there is a suggestion the document was 'generic', whatever that term means in the context in which it was stated it ought not distract from my earnest consideration of the document I signed.

4. I remain opposed to the Solar Proposal.

5. I say I have/~~have not~~ (circle appropriate) been contacted by Elgin or anyone on its behalf by letter, phone call, email, personally or otherwise, enquiring as to my opinion on solar/ renewables in particular at the subject location. If I had been so contacted I would have expressed my clear opposition to it at this site.

6. I wish to make the following additional comments:

   _____
   _____
   _____
   _____

Signed: R. Garment

Dated: 6 / 12 / 2022

Glanmire Solar Plant EIS Clarification
Near Neighbour Consultation

I Polly Bonanno (name) of 244 Brewongle Lane (address), Glanmire (occupation), say

1. I reside approximately 0 kilometres from the subject site;

2. I note the contents of the proponents EIS, in particular pages 72 and 73 "Near Neighbour Consultation" sections 1, 2 and 3;

3. I was a signatory to the Glanmire Action Groups "petition". I have now been shown a bundle of documents and identified document now marked N 88 as signed by me.

   Before signing the document, I was shown the Proponents brochure and the Glanmire Action Group's brochure.

   I was given ample opportunity to consider all aspects that I wanted to consider and thereafter signed the document.

   I am informed there is a suggestion the document was 'generic', whatever that term means in the context in which it was stated it ought not distract from my earnest consideration of the document I signed.

4. I remain opposed to the Solar Proposal.

5. I say I ~~have~~/ have not (circle appropriate) been contacted by Elgin or anyone on its behalf by letter, phone call, email, personally or otherwise, enquiring as to my opinion on solar/ renewables in particular at the subject location. If I had been so contacted I would have expressed my clear opposition to it at this site.

6. I wish to make the following additional comments:

Signed: _____

Dated: ___ / 12 / 2022

Glanmire Solar Plant EIS Clarification
Near Neighbour Consultation

I Sam Bonanno (name) of 244 Brewongle Lane (address),
Glanmire (occupation), say

1. I reside approximately 0 kilometres from the subject site;

2. I note the contents of the proponents EIS, in particular pages 72 and 73 "Near Neighbour Consultation" sections 1, 2 and 3;

3. I was a signatory to the Glanmire Action Groups "petition". I have now been shown a bundle of documents and identified document now marked N87 as signed by me.

   Before signing the document, I was shown the Proponents brochure and the Glanmire Action Group's brochure.

   I was given ample opportunity to consider all aspects that I wanted to consider and thereafter signed the document.

   I am informed there is a suggestion the document was 'generic', whatever that term means in the context in which it was stated it ought not distract from my earnest consideration of the document I signed.

4. I remain opposed to the Solar Proposal.

5. I say I ~~have~~/have not (circle appropriate) been contacted by Elgin or anyone on its behalf by letter, phone call, email, personally or otherwise, enquiring as to my opinion on solar/ renewables in particular at the subject location. If I had been so contacted I would have expressed my clear opposition to it at this site.

6. I wish to make the following additional comments:

   _____
   _____
   _____
   _____

Signed: S Bonanno

Dated: 5 / 12 / 2022

M 17.

Glanmire Solar Plant EIS Clarification
Near Neighbour Consultation

I LEONIE MACBETH (name) of 186 Mursing rd, Glanmire (address),

NURSE / MEDICO-LEGAL (occupation) CLERK / TRAUMA COUNSELLOR, say

1. I reside approximately 2 kilometres from the subject site;

2. I note the contents of the proponents EIS, in particular pages 72 and 73 "Near Neighbour Consultation" sections 1, 2 and 3;

3. I was a signatory to the Glanmire Action Groups "petition". I have now been shown a bundle of documents and identified document now marked M17 as signed by me.

   Before signing the document, I was shown the Proponents brochure and the Glanmire Action Group's brochure.

   I was given ample opportunity to consider all aspects that I wanted to consider and thereafter signed the document.

   I am informed there is a suggestion the document was 'generic', whatever that term means in the context in which it was stated it ought not distract from my earnest consideration of the document I signed.

4. I remain opposed to the Solar Proposal.

5. I say ~~I have~~/ have not (circle appropriate) been contacted by Elgin or anyone on its behalf by letter, phone call, email, personally or otherwise, enquiring as to my opinion on solar/ renewables in particular at the subject location. If I had been so contacted I would have expressed my clear opposition to it at this site.

6. I wish to make the following additional comments:

   _____
   _____
   _____
   _____

Signed: L. D. L

Dated: 6 / 12 / 2022

Glanmire Solar Plant EIS Clarification
Near Neighbour Consultation

I ANTHONY KIDD (name) of 128 MORSINK ROAD GLANMIRE (address),

IRRIGATION CONSULTANT (occupation), say

1. I reside approximately 2 kilometres from the subject site;

2. I note the contents of the proponents EIS, in particular pages 72 and 73 "Near Neighbour Consultation" sections 1, 2 and 3;

3. I was a signatory to the Glanmire Action Groups "petition". I have now been shown a bundle of documents and identified document now marked M2 as signed by me.

   Before signing the document, I was shown the Proponents brochure and the Glanmire Action Group's brochure.

   I was given ample opportunity to consider all aspects that I wanted to consider and thereafter signed the document.

   I am informed there is a suggestion the document was 'generic', whatever that term means in the context in which it was stated it ought not distract from my earnest consideration of the document I signed.

4. I remain opposed to the Solar Proposal.

5. I say (I have/ have not) (circle appropriate) been contacted by Elgin or anyone on its behalf by letter, phone call, email, personally or otherwise, enquiring as to my opinion on solar/ renewables in particular at the subject location. If I had been so contacted I would have expressed my clear opposition to it at this site.

6. I wish to make the following additional comments:
   THE LETTERS I RECIEVED ARRIVE BY MAIL AT LEAST 7 DAY AFTER THE DATE SHOWN TO RESPOND I WAS NEVER ASKED ABOUT RENEWABLES ON THAT LAND.

Signed: [signature]

Dated: 5 / 12 / 2022

Glanmire Solar Plant EIS Clarification
Near Neighbour Consultation

I Mark Pano (name) of 380 Tarana Rd, Brewongle (address)

_____ (occupation), say

1. I reside approximately 3 kilometres from the subject site;

2. I note the contents of the proponents EIS, in particular pages 72 and 73 "Near Neighbour Consultation" sections 1, 2 and 3;

3. I was a signatory to the Glanmire Action Groups "petition". I have now been shown a bundle of documents and identified document now marked R3 as signed by me.

   Before signing the document, I was shown the Proponents brochure and the Glanmire Action Group's brochure.

   I was given ample opportunity to consider all aspects that I wanted to consider and thereafter signed the document.

   I am informed there is a suggestion the document was 'generic', whatever that term means in the context in which it was stated it ought not distract from my earnest consideration of the document I signed.

4. I remain opposed to the Solar Proposal.

5. I say I have/ ~~have not~~ (circle appropriate) been contacted by Elgin or anyone on its behalf by letter, phone call, email, personally or otherwise, enquiring as to my opinion on solar/ renewables in particular at the subject location. If I had been so contacted I would have expressed my clear opposition to it at this site.

6. I wish to make the following additional comments:

   _____
   _____
   _____
   _____

Signed: _____

Dated: 11 / 12 / 2022

Glanmire Solar Plant EIS Clarification
Near Neighbour Consultation

I Ashlee Petch. of 264 Brenogle Lane, Glanmire.
(name) (address)
Sales Manager, say
(occupation)

1. I reside approximately Neighbour kilometres from the subject site;

2. I note the contents of the proponents EIS, in particular pages 72 and 73 "Near Neighbour Consultation" sections 1, 2 and 3;

3. I was a signatory to the Glanmire Action Groups "petition". I have now been shown a bundle of documents and identified document now marked R80 as signed by me.

   Before signing the document, I was shown the Proponents brochure and the Glanmire Action Group's brochure.

   I was given ample opportunity to consider all aspects that I wanted to consider and thereafter signed the document.

   I am informed there is a suggestion the document was 'generic', whatever that term means in the context in which it was stated it ought not distract from my earnest consideration of the document I signed.

4. I remain opposed to the Solar Proposal.

5. I say ~~I have~~/ have not (circle appropriate) been contacted by Elgin or anyone on its behalf by letter, phone call, email, personally or otherwise, enquiring as to my opinion on solar/ renewables in particular at the subject location. If I had been so contacted I would have expressed my clear opposition to it at this site.

6. I wish to make the following additional comments:

Signed: _____

Dated: 7 / 12 / 2022

Glanmire Solar Plant EIS Clarification
Near Neighbour Consultation

I Kelly McFadzean (name) of 752 Brewongle Lane Brewongle NSW 2795 (address)
RETIRED. (occupation), say

1. I reside approximately 3 kilometres from the subject site;

2. I note the contents of the proponents EIS, in particular pages 72 and 73 "Near Neighbour Consultation" sections 1, 2 and 3;

3. I was a signatory to the Glanmire Action Groups "petition". I have now been shown a bundle of documents and identified document now marked R38 as signed by me.

   Before signing the document, I was shown the Proponents brochure and the Glanmire Action Group's brochure.

   I was given ample opportunity to consider all aspects that I wanted to consider and thereafter signed the document.

   I am informed there is a suggestion the document was 'generic', whatever that term means in the context in which it was stated it ought not distract from my earnest consideration of the document I signed.

4. I remain opposed to the Solar Proposal.

5. I say I have/~~have not~~ (circle appropriate) been contacted by Elgin or anyone on its behalf by ~~letter, phone~~ call, email, personally or otherwise, enquiring as to my opinion on solar/ renewables in particular at the subject location. If I had been so contacted I would have expressed my clear opposition to it at this site.

6. I wish to make the following additional comments:
   I have worked on the land all my life. This idea of using our prime agricultural land. is scandalous, obviously this Elgin mob are another contemptible mob.

Signed: K S McFadzean

Dated: 9 / 12 / 2022

Mob No. 0438 375 592

Email knhmcfade yahoo.com.

Glanmire Solar Plant EIS Clarification
Near Neighbour Consultation

I HELEN McFADZEAN (name) of 752 BRENONGLE LANE, BRENONGLE. 2795. (address)

HOME MANAGEMENT (occupation) say

1. I reside approximately 3 kilometres from the subject site;

2. I note the contents of the proponents EIS, in particular pages 72 and 73 "Near Neighbour Consultation" sections 1, 2 and 3;

3. I was a signatory to the Glanmire Action Groups "petition". I have now been shown a bundle of documents and identified document now marked R37 as signed by me.

   Before signing the document, I was shown the Proponents brochure and the Glanmire Action Group's brochure.

   I was given ample opportunity to consider all aspects that I wanted to consider and thereafter signed the document.

   I am informed there is a suggestion the document was 'generic', whatever that term means in the context in which it was stated it ought not distract from my earnest consideration of the document I signed.

4. I remain opposed to the Solar Proposal.

5. I say ~~I have~~/ (have not) (circle appropriate) been contacted by Elgin or anyone on its behalf by letter, phone call, email, personally or otherwise, enquiring as to my opinion on solar/ renewables in particular at the subject location. If I had been so contacted I would have expressed my clear opposition to it at this site.

6. I wish to make the following additional comments:
   ANOTHER MOB OF NED KELLY'S WANTING TO DESTROY OUR PICTURESQUE LAND WITH A LOAD OF GLASS THEN DISAPPEAR TO LEAVE THIS EVIL, STUFFING OUR FOOD PRODUCING LAND. ALSO WHERE TO PUT THIS RUBBISH WHEN IT'S WORN OUT. CANT GO INTO LANDFILL.

Signed: Helen McFadzean

Dated: 9 / 12 / 2022

Mob No: 0400481218

Email: krhmcfade@yahoo.com

Glanmire Solar Plant EIS Clarification
Near Neighbour Consultation

I Denise Hennessy (name) of 457 Brewsingle Lane Glanmire (address)
Farmer (occupation), say

1. I reside approximately 2 kilometres from the subject site;

2. I note the contents of the proponents EIS, in particular pages 72 and 73 "Near Neighbour Consultation" sections 1, 2 and 3;

3. I was a signatory to the Glanmire Action Groups "petition". I have now been shown a bundle of documents and identified document now marked 1 was signed by me.

   Before signing the document, I was shown the Proponents brochure and the Glanmire Action Group's brochure.

   I was given ample opportunity to consider all aspects that I wanted to consider and thereafter signed the document.

   I am informed there is a suggestion the document was 'generic', whatever that term means in the context in which it was stated it ought not distract from my earnest consideration of the document I signed.

4. I remain opposed to the Solar Proposal.

5. I say ~~I have~~/(have not) (circle appropriate) been contacted by Elgin or anyone on its behalf by letter, phone call, email, personally or otherwise, enquiring as to my opinion on solar/ renewables in particular at the subject location. If I had been so contacted I would have expressed my clear opposition to it at this site.

6. I wish to make the following additional comments:

   _____
   _____
   _____
   _____

Signed: _____

Dated: ___ / 12 / 2022

Glanmire Solar Plant EIS Clarification
Near Neighbour Consultation

I IAN McLEAN. (name) of 259 GLANMIRE LANE. (address),
GRAZIER. (occupation), say

1. I reside approximately 3. kilometres from the subject site;

2. I note the contents of the proponents EIS, in particular pages 72 and 73 "Near Neighbour Consultation" sections 1, 2 and 3;

3. I was a signatory to the Glanmire Action Groups "petition". I have now been shown a bundle of documents and identified document now marked ___ as signed by me.

   Before signing the document, I was shown the Proponents brochure and the Glanmire Action Group's brochure.

   I was given ample opportunity to consider all aspects that I wanted to consider and thereafter signed the document.

   I am informed there is a suggestion the document was 'generic', whatever that term means in the context in which it was stated it ought not distract from my earnest consideration of the document I signed.

4. I remain opposed to the Solar Proposal.

5. I say I ~~have~~/~~have not~~ (circle appropriate) been contacted by Elgin or anyone on its behalf by letter, phone call, email, personally or otherwise, enquiring as to my opinion on solar/ renewables in particular at the subject location. If I had been so contacted I would have expressed my clear opposition to it at this site.

6. I wish to make the following additional comments:
   I am not opposed to solar farms provided proper consideration is given to location and the proposed location is totally unacceptable to me. It is on prime farming land in my opinion and should be on land such as National park areas.

Signed: IMcLean

Dated: 8 / 12 / 2022

Glanmire Solar Plant EIS Clarification
Near Neighbour Consultation

I Daniel Garcia Capel (name) of 461 Brewongle lane (address),
banker (occupation), say

1. I reside approximately 2.1 kilometres from the subject site;

2. I note the contents of the proponents EIS, in particular pages 72 and 73 "Near Neighbour Consultation" sections 1, 2 and 3;

3. ~~I was a signatory to the Glanmire Action Groups "petition". I have now been shown a bundle of documents and identified document now marked ___ as signed by me.~~

   Before signing the document, I was shown the Proponents brochure and the Glanmire Action Group's brochure.

   I was given ample opportunity to consider all aspects that I wanted to consider and thereafter signed the document.

   I am informed there is a suggestion the document was 'generic', whatever that term means in the context in which it was stated it ought not distract from my earnest consideration of the document I signed.

4. I remain opposed to the Solar Proposal.

5. I say I have/~~have not~~ (circle appropriate) been contacted by Elgin or anyone on its behalf by letter, phone call, email, personally or otherwise, enquiring as to my opinion on solar/ renewables in particular at the subject location. If I had been so contacted I would have expressed my clear opposition to it at this site.

6. I wish to make the following additional comments:

Signed: Daniel Garcia Capel

Dated: 2 / 12 / 2022

Glanmire Solar Plant EIS Clarification
Near Neighbour Consultation

I Sheridan Allen (name) of 671 Brewongle Lane, Brewongle NSW 2795 (address)
retail assistant (occupation), say

1. I reside approximately 3 kilometres from the subject site;

2. I note the contents of the proponents EIS, in particular pages 72 and 73 "Near Neighbour Consultation" sections 1, 2 and 3;

3. I was a signatory to the Glanmire Action Groups "petition". I have now been shown a bundle of documents and identified document now marked R39 as signed by me.

   Before signing the document, I was shown the Proponents brochure and the Glanmire Action Group's brochure.

   I was given ample opportunity to consider all aspects that I wanted to consider and thereafter signed the document.

   I am informed there is a suggestion the document was 'generic', whatever that term means in the context in which it was stated it ought not distract from my earnest consideration of the document I signed.

4. I remain opposed to the Solar Proposal.

5. I say ~~I have~~/ have not (circle appropriate) been contacted by Elgin or anyone on its behalf by letter, phone call, email, personally or otherwise, enquiring as to my opinion on solar/ renewables in particular at the subject location. If I had been so contacted I would have expressed my clear opposition to it at this site.

6. I wish to make the following additional comments:

Signed: _____

Dated: 7 / 12 / 2022

email: Sheridan.allen58@gmail.com ph: 0401295461

Glanmire Solar Plant EIS Clarification
Near Neighbour Consultation

I Guy Bowden of 462 Brewongle Lane, Brewongle & 10 Keith Street, Roseville
(name) (address)

Video Editor & Land Owner/Farmer say
(occupation)

1. I reside approximately 3 kilometres from the subject site;

2. I note the contents of the proponents EIS, in particular pages 72 and 73 "Near Neighbour Consultation" sections 1, 2 and 3;

3. I was a signatory to the Glanmire Action Groups "petition". I have now been shown a bundle of documents and identified document now marked ___ as signed by me.

   Before signing the document, I was shown the Proponents brochure and the Glanmire Action Group's brochure.

   I was given ample opportunity to consider all aspects that I wanted to consider and thereafter signed the document.

   I am informed there is a suggestion the document was "generic", whatever that term means in the context in which it was stated it ought not distract from my earnest consideration of the document I signed.

4. I remain opposed to the Solar Proposal.

5. I say I have/~~have not~~ (circle appropriate) been contacted by Elgin or anyone on its behalf by letter, phone call, email, personally or otherwise, enquiring as to my opinion on solar renewables in particular at the subject location. If I had been so contacted I would have expressed my clear opposition to it at this site.

6. I wish to make the following additional comments:

Signed: [signature]

Dated: 5 12 2022

Glanmire Solar Plant EIS Clarification
Near Neighbour Consultation

I Jacinta Hennessy-Bowdoll 462 Brewarge Lane, Keightsbridge Rd
(name) (address)

Farmer + Food Technologist say
(occupation)

1. I reside approximately 8 kilometres from the subject site:

2. I note the contents of the proponents EIS, in particular pages 72 and 73 "Near Neighbour Consultation" sections 1, 2 and 3:

3. I was a signatory to the Glanmire Action Groups "petition". I have now been shown a bundle of documents and identified document now marked ___ as signed by me.

   Before signing the document, I was shown the Proponents brochure and the Glanmire Action Group's brochure.

   I was given ample opportunity to consider all aspects that I wanted to consider and thereafter signed the document.

   I am informed there is a suggestion the document was 'generic', whatever that term means in the context in which it was stated it ought not distract from my earnest consideration of the document I signed.

4. I remain opposed to the Solar Proposal.

5. I say I have/ have not (circle appropriate) been contacted by Elgin or anyone on its behalf by letter, phone call, email, personally or otherwise, enquiring as to my opinion on solar/ renewables in particular at the subject location. If I had been so contacted I would have expressed my clear opposition to it at this site.

6. I wish to make the following additional comments:
   Building a Solar farm on prime agricultural land which produces food, makes no sense.

Signed: [signature]

Dated: 8 / 12 / 2022

Glanmire Solar Plant EIS Clarification
Near Neighbour Consultation

I Peter Hennessy of 957 Brewongle Lane Glanmire
(name) (~~address~~)

Farmer, say
(occupation)

1. I reside approximately 2 kilometres from the subject site;

2. I note the contents of the proponents EIS, in particular pages 72 and 73 "Near Neighbour Consultation" sections 1, 2 and 3;

3. I was a signatory to the Glanmire Action Groups "petition". I have now been shown a bundle of documents and identified document now marked 1111 as signed by me.

   Before signing the document, I was shown the Proponents brochure and the Glanmire Action Group's brochure.

   I was given ample opportunity to consider all aspects that I wanted to consider and thereafter signed the document.

   I am informed there is a suggestion the document was 'generic', whatever that term means in the context in which it was stated it ought not distract from my earnest consideration of the document I signed.

4. I remain opposed to the Solar Proposal.

5. I say ~~I have/~~(have not) (circle appropriate) been contacted by Elgin or anyone on its behalf by letter, phone call, email, personally or otherwise, enquiring as to my opinion on solar/ renewables in particular at the subject location. If I had been so contacted I would have expressed my clear opposition to it at this site.

6. I wish to make the following additional comments:
   The proposals is in an area where Council allows residents on 1 acre lots to preserve the quality land for productive agriculture & allows farmers to live & practice environmental principles. Farmers are doing this well. The proposal is inappropriate in this setting

Signed: [signature] M. 0414378565

Dated: 1/2/ 12 / 2022 email: peter_hennessy@hotmail.com

Glanmire Solar Plant EIS Clarification
Near Neighbour Consultation

I VIVIAN KEITH PRESS of 390 TARANA ROAD BATHURST,
(name) (address)

FARMER, say
(occupation)

1. I reside approximately 3 kilometres from the subject site;

2. I note the contents of the proponents EIS, in particular pages 72 and 73 "Near Neighbour Consultation" sections 1, 2 and 3;

3. I was a signatory to the Glanmire Action Groups "petition". I have now been shown a bundle of documents and identified document now marked R 66 as signed by me.

   Before signing the document, I was shown the Proponents brochure and the Glanmire Action Group's brochure.

   I was given ample opportunity to consider all aspects that I wanted to consider and thereafter signed the document.

   I am informed there is a suggestion the document was 'generic', whatever that term means in the context in which it was stated it ought not distract from my earnest consideration of the document I signed.

4. I remain opposed to the Solar Proposal.

5. I say ~~I have~~/ (have not) (circle appropriate) been contacted by Elgin or anyone on its behalf by letter, phone call, email, personally or otherwise, enquiring as to my opinion on solar/ renewables in particular at the subject location. If I had been so contacted I would have expressed my clear opposition to it at this site.

6. I wish to make the following additional comments:

   _____
   _____
   _____
   _____

Signed: V. Press

Dated: 8 / 12 / 2022

Glanmire Solar Plant EIS Clarification
Near Neighbour Consultation

I MAUREEN PATRICIA PRESS of 390 TARANA ROAD BATHURST,
(name) (address)

FARMER, say
(occupation)

1. I reside approximately 3 kilometres from the subject site;

2. I note the contents of the proponents EIS, in particular pages 72 and 73 "Near Neighbour Consultation" sections 1, 2 and 3;

3. I was a signatory to the Glanmire Action Groups "petition". I have now been shown a bundle of documents and identified document now marked R67 as signed by me.

   Before signing the document, I was shown the Proponents brochure and the Glanmire Action Group's brochure.

   I was given ample opportunity to consider all aspects that I wanted to consider and thereafter signed the document.

   I am informed there is a suggestion the document was 'generic', whatever that term means in the context in which it was stated it ought not distract from my earnest consideration of the document I signed.

4. I remain opposed to the Solar Proposal.

5. I say ~~I have~~/have not (circle appropriate) been contacted by Elgin or anyone on its behalf by letter, phone call, email, personally or otherwise, enquiring as to my opinion on solar/ renewables in particular at the subject location. If I had been so contacted I would have expressed my clear opposition to it at this site.

6. I wish to make the following additional comments:

   _____
   _____
   _____
   _____

Signed: M Press

Dated: 8 / 12 / 2022

Glanmire Solar Plant EIS Clarification
Near Neighbour Consultation

I Diane Williman (name) of Windy Hill 4466 Gt. Western Highway Glanmire, NSW (address) Journalist, Landholder (occupation) say

1. I reside approximately 3 kilometres from the subject site;

2. I note the contents of the proponents EIS, in particular pages 72 and 73 "Near Neighbour Consultation" sections 1, 2 and 3;

3. I was a signatory to the Glanmire Action Groups "petition". I have now been shown a bundle of documents and identified document now marked 19 as signed by me.

   Before signing the document, I was shown the Proponents brochure and the Glanmire Action Group's brochure.

   I was given ample opportunity to consider all aspects that I wanted to consider and thereafter signed the document.

   I am informed there is a suggestion the document was 'generic', whatever that term means in the context in which it was stated it ought not distract from my earnest consideration of the document I signed.

4. I remain opposed to the Solar Proposal.

5. I say I have/ ~~have not~~ (circle appropriate) been contacted by Elgin or anyone on its behalf by letter, phone call, email, personally or otherwise, enquiring as to my opinion on solar/ renewables in particular at the subject location. If I had been so contacted, I would have expressed my clear opposition to it at this site.

6. I wish to make the following additional comments:
   This proposal lacks substance detail & clarity. It is a clear attempt to manipulate government processes & controls to avoid proper scrutiny & destroy prime agricultural land, community amenity & avoid renewable energy Rowe scrutiny.

Signed: Williman

Dated: 5 / 12 / 2022

Glanmire Solar Plant EIS Clarification
Near Neighbour Consultation

I Philip Tabone. of 4467 Great Western Hyway. Glanmire.
(name) (address)

Self Employed., say
(occupation)

1. I reside approximately 2.3 kilometres from the subject site;

2. I note the contents of the proponents EIS, in particular pages 72 and 73 "Near Neighbour Consultation" sections 1, 2 and 3;

3. I was a signatory to the Glanmire Action Groups "petition". I have now been shown a bundle of documents and identified document now marked H104 as signed by me.

   Before signing the document, I was shown the Proponents brochure and the Glanmire Action Group's brochure.

   I was given ample opportunity to consider all aspects that I wanted to consider and thereafter signed the document.

   I am informed there is a suggestion the document was 'generic', whatever that term means in the context in which it was stated it ought not distract from my earnest consideration of the document I signed.

4. I remain opposed to the Solar Proposal.

5. I say ~~have~~ have not (circle appropriate) been contacted by Elgin or anyone on its behalf by ~~letter, phone~~ call, email, personally or otherwise, enquiring as to my opinion on solar/ renewables in particular at the subject location. If I had been so contacted, I would have expressed my clear opposition to it at this site.

6. I wish to make the following additional comments:
   There has been Zero contact By any Elgin Energy Representative in regards to this development.

Signed: _____

Dated: 9 / 12 / 2022

Glanmire Solar Plant EIS Clarification
Near Neighbour Consultation

I Brad Green (name) of 723 Brewarrina Lane, (address)
Project Engineer, (occupation) say

1. I reside approximately 3-4 kilometres from the subject site;

2. I note the contents of the proponents EIS, in particular pages 72 and 73 "Near Neighbour Consultation" sections 1, 2 and 3;

3. I was a signatory to the Glanmire Action Groups "petition". I have now been shown a bundle of documents and identified document now marked ___ as signed by me.

   Before signing the document, I was shown the Proponents brochure and the Glanmire Action Group's brochure.

   I was given ample opportunity to consider all aspects that I wanted to consider and thereafter signed the document.

   I am informed there is a suggestion the document was 'generic', whatever that term means in the context in which it was stated it ought not distract from my earnest consideration of the document I signed.

4. I remain opposed to the Solar Proposal.

5. I say I have/have not (circle appropriate) been contacted by Elgin or anyone on its behalf by letter, phone call, email, personally or otherwise, enquiring as to my opinion on solar/ renewables in particular at the subject location. If I had been so contacted I would have expressed my clear opposition to it at this site.

6. I wish to make the following additional comments:
   Personally contact me with your information brief & make arrangements to meet with me & my fellow community members to complete a brief & respect our opinions

Signed: [signature]

Dated: 8 / 12 / 2022

Glanmire Solar Plant EIS Clarification
Near Neighbour Consultation

I PETER RAY of 4313 GREAT WESTERN HIGHWAY, WALANG
(name) (address)

FARMER, say
(occupation)

1. I reside approximately 4·5 kilometres from the subject site;

2. I note the contents of the proponents EIS, in particular pages 72 and 73 "Near Neighbour Consultation" sections 1, 2 and 3;

3. I was a signatory to the Glanmire Action Groups "petition". I have now been shown a bundle of documents and identified document now marked NID-231 as signed by me.

   Before signing the document, I was shown the Proponents brochure and the Glanmire Action Group's brochure.

   I was given ample opportunity to consider all aspects that I wanted to consider and thereafter signed the document.

   I am informed there is a suggestion the document was 'generic', whatever that term means in the context in which it was stated it ought not distract from my earnest consideration of the document I signed.

4. I remain opposed to the Solar Proposal.

5. I say I have/(have not) (circle appropriate) been contacted by Elgin or anyone on its behalf by letter, phone call, email, personally or otherwise, enquiring as to my opinion on solar/ renewables in particular at the subject location. If I had been so contacted I would have expressed my clear opposition to it at this site.

6. I wish to make the following additional comments:

Signed: P K Ray

Dated: 7 / 12 / 2022

Glanmire Solar Plant EIS Clarification
Near Neighbour Consultation

I CHRISTINE RAY (name) of 4313 GREAT WESTERN HWY. WALANG (address),

FARMER (occupation), say

1. I reside approximately 4.5 kilometres from the subject site;

2. I note the contents of the proponents EIS, in particular pages 72 and 73 "Near Neighbour Consultation" sections 1, 2 and 3;

3. I was a signatory to the Glanmire Action Groups "petition". I have now been shown a bundle of documents and identified document now marked 232 NID as signed by me.

   Before signing the document, I was shown the Proponents brochure and the Glanmire Action Group's brochure.

   I was given ample opportunity to consider all aspects that I wanted to consider and thereafter signed the document.

   I am informed there is a suggestion the document was 'generic', whatever that term means in the context in which it was stated it ought not distract from my earnest consideration of the document I signed.

4. I remain opposed to the Solar Proposal.

5. I say I have/(have not) (circle appropriate) been contacted by Elgin or anyone on its behalf by letter, phone call, email, personally or otherwise, enquiring as to my opinion on solar/ renewables in particular at the subject location. If I had been so contacted I would have expressed my clear opposition to it at this site.

6. I wish to make the following additional comments:

   _____
   _____
   _____
   _____

Signed: Christine Ray

Dated: 7 / 12 / 2022

Glanmire Solar Plant EIS Clarification
Near Neighbour Consultation

I Maureen Markwick of 275 Mersing Rd Glanmire NSW 2795
(name) (address)

_____, say
(occupation)

1. I reside approximately 3.5 kilometres from the subject site;

2. I note the contents of the proponents EIS, in particular pages 72 and 73 "Near Neighbour Consultation" sections 1, 2 and 3;

3. I was a signatory to the Glanmire Action Groups "petition". I have now been shown a bundle of documents and identified document now marked M18 as signed by me.

   Before signing the document, I was shown the Proponents brochure and the Glanmire Action Group's brochure.

   I was given ample opportunity to consider all aspects that I wanted to consider and thereafter signed the document.

   I am informed there is a suggestion the document was 'generic', whatever that term means in the context in which it was stated it ought not distract from my earnest consideration of the document I signed.

4. I remain opposed to the Solar Proposal.

5. I say I have/have not (circle appropriate) been contacted by Elgin or anyone on its behalf by letter, phone call, email, personally or otherwise, enquiring as to my opinion on solar/ renewables in particular at the subject location. If I had been so contacted I would have expressed my clear opposition to it at this site.

6. I wish to make the following additional comments:
   _____
   _____
   _____
   _____

Signed: M Markwick

Dated: 6 / 12 / 2022

Glanmire Solar Plant EIS Clarification
Near Neighbour Consultation

I Richard Brien (name) of 3786 O'Connell Rd Kelso (address)
Farm Manager (occupation), say

1. I reside approximately 45 kilometres from the subject site;

2. I note the contents of the proponents EIS, in particular pages 72 and 73 "Near Neighbour Consultation" sections 1, 2 and 3;

3. I was a signatory to the Glanmire Action Groups "petition". I have now been shown a bundle of documents and identified document now marked A27 as signed by me.

   Before signing the document, I was shown the Proponents brochure and the Glanmire Action Group's brochure.

   I was given ample opportunity to consider all aspects that I wanted to consider and thereafter signed the document.

   I am informed there is a suggestion the document was 'generic', whatever that term means in the context in which it was stated it ought not distract from my earnest consideration of the document I signed.

4. I remain opposed to the Solar Proposal.

5. I say I have/ have not (circle appropriate) been contacted by Elgin or anyone on its behalf by letter, phone call, email, personally or otherwise, enquiring as to my opinion on solar/ renewables in particular at the subject location. If I had been so contacted I would have expressed my clear opposition to it at this site.

6. I wish to make the following additional comments:

   _____
   _____
   _____
   _____

Signed: _____

Dated: 9 / 12 / 2022

Glanmire Solar Plant EIS Clarification
Near Neighbour Consultation

I Peter McGrath (name) of 101 Burkes Lane, Brewangle (address),

Vigneron (occupation), say

1. I reside approximately 5 kilometres from the subject site;

2. I note the contents of the proponents EIS, in particular pages 72 and 73 "Near Neighbour Consultation" sections 1, 2 and 3;

3. I was a signatory to the Glanmire Action Groups "petition". I have now been shown a bundle of documents and identified document now marked ___ as signed by me.

   Before signing the document, I was shown the Proponents brochure and the Glanmire Action Group's brochure.

   I was given ample opportunity to consider all aspects that I wanted to consider and thereafter signed the document.

   I am informed there is a suggestion the document was 'generic', whatever that term means in the context in which it was stated it ought not distract from my earnest consideration of the document I signed.

4. I remain opposed to the Solar Proposal.

5. I say I have/~~have not~~ (circle appropriate) been contacted by Elgin or anyone on its behalf by ~~letter, phone~~ call, email, personally or otherwise, enquiring as to my opinion on solar/ renewables in particular at the subject location. If I had been so contacted I would have expressed my clear opposition to it at this site.

6. I wish to make the following additional comments:

   _____
   _____
   _____
   _____

Signed: _____

Dated: 9 / 12 / 2022

Glanmire Solar Plant EIS Clarification
Near Neighbour Consultation

I Robyn McGrath (name) of 101 Barker Lane Brewongle (address)

LSSD Tech (occupation), say

1. I reside approximately 5 kilometres from the subject site;

2. I note the contents of the proponents EIS, in particular pages 72 and 73 "Near Neighbour Consultation" sections 1, 2 and 3;

3. I was a signatory to the Glanmire Action Groups "petition". I have now been shown a bundle of documents and identified document now marked ___ as signed by me.

   Before signing the document, I was shown the Proponents brochure and the Glanmire Action Group's brochure.

   I was given ample opportunity to consider all aspects that I wanted to consider and thereafter signed the document.

   I am informed there is a suggestion the document was 'generic', whatever that term means in the context in which it was stated it ought not distract from my earnest consideration of the document I signed.

4. I remain opposed to the Solar Proposal.

5. I say I have/~~have not~~ (circle appropriate) been contacted by Elgin or anyone on its behalf by letter, ~~phone~~ call, email, personally or otherwise, enquiring as to my opinion on solar/ renewables in particular at the subject location. If I had been so contacted I would have expressed my clear opposition to it at this site.

6. I wish to make the following additional comments:

   _____
   _____
   _____
   _____

Signed: _____

Dated: 9 / 12 / 2022

Glanmire Solar Plant EIS Clarification
Near Neighbour Consultation

I Geoffrey Garment (name) of 4 Robindale Court (address),
Farmer (occupation), say

1. I reside approximately ____ kilometres from the subject site;

2. I note the contents of the proponents EIS, in particular pages 72 and 73 "Near Neighbour Consultation" sections 1, 2 and 3;

3. I was a signatory to the Glanmire Action Groups "petition". I have now been shown a bundle of documents and identified document now marked 203 N10 as signed by me.

   Before signing the document, I was shown the Proponents brochure and the Glanmire Action Group's brochure.

   I was given ample opportunity to consider all aspects that I wanted to consider and thereafter signed the document.

   I am informed there is a suggestion the document was 'generic', whatever that term means in the context in which it was stated it ought not distract from my earnest consideration of the document I signed.

4. I remain opposed to the Solar Proposal.

5. I say I have/ have not (circle appropriate) been contacted by Elgin or anyone on its behalf by letter, phone call, email, personally or otherwise, enquiring as to my opinion on solar/ renewables in particular at the subject location. If I had been so contacted I would have expressed my clear opposition to it at this site.

6. I wish to make the following additional comments:

   _____
   _____
   _____
   _____

Signed: _____

Dated: 06 / 12 / 2022

STOP THE SOLAR FARM AT GLANMIRE

TO NGH CONSULTING

Please accept the following personal contribution to the community consultation study on the Glanmire Solar Farm, planned for 4823 Great Western Highway, Glanmire, NSW 2795.

My name is: Phillip Hewitt

I live within a 3km radius of the proposed site.

I do NOT want the above stated solar development at Glanmire.

I am distressed and I am angry about this solar farm development.

I object to this solar development because:

1. The planned site is prime agricultural land, classified by NSW Planning as category 2 -3 productive cultivation land. This land has a history of over 100 years of demonstrated productive capacity as prime cultivation land.

2. The site sits within 5kms of Raglan residential area and greenbelt land. In 2021 NSW Planning made an amendment that recognised the need to avoid solar developments within five kilometres of residential areas and greenbelts.

3. The Glanmire site does not site within a Renewable Energy Zone. Renewable Energy Zones have been established by NSW Government, on land that is appropriate for large solar farm developments.

4. This planned development will have a significant negative impact on visitor tourism experience at the gateway to the Bathurst and the greater Central West area.

Renewable energies should not come at the cost of livelihoods, local communities, local economies and prime productive land. I want this development stopped.

Signed: [signature]

Date: 22/5/22

Email:

Phone/Mobile: 0427 91 9677

STOP THE SOLAR FARM AT GLANMIRE

TO NGH CONSULTING

Please accept the following personal contribution to the community consultation study on the Glanmire Solar Farm, planned for 4823 Great Western Highway, Glanmire, NSW 2795.

My name is: DAVID SMITH

I live within a 3km radius of the proposed site.

I do NOT want the above stated solar development at Glanmire.

I am distressed and I am angry about this solar farm development.

I object to this solar development because:

1. The planned site is prime agricultural land, classified by NSW Planning as category 2 -3 productive cultivation land. This land has a history of over 100 years of demonstrated productive capacity as prime cultivation land.

2. The site sits within 5kms of Raglan residential area and greenbelt land. In 2021 NSW Planning made an amendment that recognised the need to avoid solar developments within five kilometres of residential areas and greenbelts.

3. The Glanmire site does not site within a Renewable Energy Zone. Renewable Energy Zones have been established by NSW Government, on land that is appropriate for large solar farm developments.

4. This planned development will have a significant negative impact on visitor tourism experience at the gateway to the Bathurst and the greater Central West area.

Renewable energies should not come at the cost of livelihoods, local communities, local economies and prime productive land. I want this development stopped.

Signed: 

Date: 25/5/22

Email: david@davidgsmith.com

Phone/Mobile: 0409 656 289

STOP THE SOLAR FARM AT GLANMIRE

TO NGH CONSULTING

Please accept the following personal contribution to the community consultation study on the Glanmire Solar Farm, planned for 4823 Great Western Highway, Glanmire, NSW 2795.

My name is: JIM SARAN

I live within a 3km radius of the proposed site.

I do NOT want the above stated solar development at Glanmire.

I am distressed and I am angry about this solar farm development.

I object to this solar development because:

1. The planned site is prime agricultural land, classified by NSW Planning as category 2 -3 productive cultivation land. This land has a history of over 100 years of demonstrated productive capacity as prime cultivation land.

2. The site sits within 5kms of Raglan residential area and greenbelt land. In 2021 NSW Planning made an amendment that recognised the need to avoid solar developments within five kilometres of residential areas and greenbelts.

3. The Glanmire site does not site within a Renewable Energy Zone. Renewable Energy Zones have been established by NSW Government, on land that is appropriate for large solar farm developments.

4. This planned development will have a significant negative impact on visitor tourism experience at the gateway to the Bathurst and the greater Central West area.

Renewable energies should not come at the cost of livelihoods, local communities, local economies and prime productive land. I want this development stopped.

Signed: [signature]

Date: 22/5/22

Email: jsaran@saran.com.au

Phone/Mobile: 0429 909 262

STOP THE SOLAR FARM AT GLANMIRE

TO NGH CONSULTING

Please accept the following personal contribution to the community consultation study on the Glanmire Solar Farm, planned for 4823 Great Western Highway, Glanmire, NSW 2795.

My name is: Mathew Cocks

I live within a 3km radius of the proposed site.

I do NOT want the above stated solar development at Glanmire.

I am distressed and I am angry about this solar farm development.

I object to this solar development because:

1. The planned site is prime agricultural land, classified by NSW Planning as category 2 -3 productive cultivation land. This land has a history of over 100 years of demonstrated productive capacity as prime cultivation land.

2. The site sits within 5kms of Raglan residential area and greenbelt land. In 2021 NSW Planning made an amendment that recognised the need to avoid solar developments within five kilometres of residential areas and greenbelts.

3. The Glanmire site does not site within a Renewable Energy Zone. Renewable Energy Zones have been established by NSW Government, on land that is appropriate for large solar farm developments.

4. This planned development will have a significant negative impact on visitor tourism experience at the gateway to the Bathurst and the greater Central West area.

Renewable energies should not come at the cost of livelihoods, local communities, local economies and prime productive land. I want this development stopped.

Signed:

Date: 21-5-22

Email: mathew_cocks@bigpond.com

Phone/Mobile: 0419219435

STOP THE SOLAR FARM AT GLANMIRE

TO NGH CONSULTING

Please accept the following personal contribution to the community consultation study on the Glanmire Solar Farm, planned for 4823 Great Western Highway, Glanmire, NSW 2795.

My name is: Peter Wood

I live within a 3km radius of the proposed site.

I do NOT want the above stated solar development at Glanmire.

I am distressed and I am angry about this solar farm development.

I object to this solar development because:

1. The planned site is prime agricultural land, classified by NSW Planning as category 2 -3 productive cultivation land. This land has a history of over 100 years of demonstrated productive capacity as prime cultivation land.

2. The site sits within 5kms of Raglan residential area and greenbelt land. In 2021 NSW Planning made an amendment that recognised the need to avoid solar developments within five kilometres of residential areas and greenbelts.

3. The Glanmire site does not site within a Renewable Energy Zone. Renewable Energy Zones have been established by NSW Government, on land that is appropriate for large solar farm developments.

4. This planned development will have a significant negative impact on visitor tourism experience at the gateway to the Bathurst and the greater Central West area.

Renewable energies should not come at the cost of livelihoods, local communities, local economies and prime productive land. I want this development stopped.

Signed: P wood

Date: 22-5-2022

Email: pwwood@hotmail.com.

Phone/Mobile: 63373742.

STOP THE SOLAR FARM AT GLANMIRE

TO NGH CONSULTING

Please accept the following personal contribution to the community consultation study on the Glanmire Solar Farm, planned for 4823 Great Western Highway, Glanmire, NSW 2795.

My name is: Matthew Gauci

I live within a 3km radius of the proposed site.

I do NOT want the above stated solar development at Glanmire.

I am distressed and I am angry about this solar farm development.

I object to this solar development because:

1. The planned site is prime agricultural land, classified by NSW Planning as category 2 -3 productive cultivation land. This land has a history of over 100 years of demonstrated productive capacity as prime cultivation land.

2. The site sits within 5kms of Raglan residential area and greenbelt land. In 2021 NSW Planning made an amendment that recognised the need to avoid solar developments within five kilometres of residential areas and greenbelts.

3. The Glanmire site does not site within a Renewable Energy Zone. Renewable Energy Zones have been established by NSW Government, on land that is appropriate for large solar farm developments.

4. This planned development will have a significant negative impact on visitor tourism experience at the gateway to the Bathurst and the greater Central West area.

Renewable energies should not come at the cost of livelihoods, local communities, local economies and prime productive land. I want this development stopped.

Signed: Gauci

Date: 24/5/22

Email: vrmelectrical@gmail.com

Phone/Mobile: 0418 490903

Please accept the following personal contribution to the community consultation study on the Glanmire Solar Farm, planned for 4823 Great Western Highway, Glanmire, NSW 2795.

My name is: Maria Muscara

I live within a 3km radius of the proposed site.

I do NOT want the above stated solar development at Glanmire.

I am distressed and I am angry about this solar farm development.

I object to this solar development because:

1. The planned site is prime agricultural land, classified by NSW Planning as category 2 -3 productive cultivation land. This land has a history of over 100 years of demonstrated productive capacity as prime cultivation land.

2. The site sits within 5kms of Raglan residential area and greenbelt land. In 2021 NSW Planning made an amendment that recognised the need to avoid solar developments within five kilometres of residential areas and greenbelts.

3. The Glanmire site does not site within a Renewable Energy Zone. Renewable Energy Zones have been established by NSW Government, on land that is appropriate for large solar farm developments.

4. This planned development will have a significant negative impact on visitor tourism experience at the gateway to the Bathurst and the greater Central West area.

Renewable energies should not come at the cost of livelihoods, local communities, local economies and prime productive land. I want this development stopped.

Signed:

Date: 24/05/22

Email: m_muscara87@hotmail.com

Phone/Mobile: 0416 087 843

STOP THE SOLAR FARM AT GLANMIRE

TO NGH CONSULTING

Please accept the following personal contribution to the community consultation study on the Glanmire Solar Farm, planned for 4823 Great Western Highway, Glanmire, NSW 2795.

My name is: Francine Thompson

I live within a 3km radius of the proposed site.

I do NOT want the above stated solar development at Glanmire.

I am distressed and I am angry about this solar farm development.

I object to this solar development because:

1. The planned site is prime agricultural land, classified by NSW Planning as category 2 -3 productive cultivation land. This land has a history of over 100 years of demonstrated productive capacity as prime cultivation land.

2. The site sits within 5kms of Raglan residential area and greenbelt land. In 2021 NSW Planning made an amendment that recognised the need to avoid solar developments within five kilometres of residential areas and greenbelts.

3. The Glanmire site does not site within a Renewable Energy Zone. Renewable Energy Zones have been established by NSW Government, on land that is appropriate for large solar farm developments.

4. This planned development will have a significant negative impact on visitor tourism experience at the gateway to the Bathurst and the greater Central West area.

Renewable energies should not come at the cost of livelihoods, local communities, local economies and prime productive land. I want this development stopped.

Signed: F Thompson

Date: 22.5.22

Email:

Phone/Mobile: 0455 305 538

STOP THE SOLAR FARM AT GLANMIRE

TO NGH CONSULTING

Please accept the following personal contribution to the community consultation study on the Glanmire Solar Farm, planned for 4823 Great Western Highway, Glanmire, NSW 2795.

My name is: Charlie Hennessy - Bowden

I live within a 3km radius of the proposed site.

I do NOT want the above stated solar development at Glanmire.

I am distressed and I am angry about this solar farm development.

I object to this solar development because:

1. The planned site is prime agricultural land, classified by NSW Planning as category 2 -3 productive cultivation land. This land has a history of over 100 years of demonstrated productive capacity as prime cultivation land.

2. The site sits within 5kms of Raglan residential area and greenbelt land. In 2021 NSW Planning made an amendment that recognised the need to avoid solar developments within five kilometres of residential areas and greenbelts.

3. The Glanmire site does not site within a Renewable Energy Zone. Renewable Energy Zones have been established by NSW Government, on land that is appropriate for large solar farm developments.

4. This planned development will have a significant negative impact on visitor tourism experience at the gateway to the Bathurst and the greater Central West area.

Renewable energies should not come at the cost of livelihoods, local communities, local economies and prime productive land. I want this development stopped.

Signed: Charlie Hennessy - Bowden

Date: 23/5/22

Email: jacinta_hb@optusnet.com.au

Phone/Mobile: 0414375563

STOP THE SOLAR FARM AT GLANMIRE

TO NGH CONSULTING

Please accept the following personal contribution to the community consultation study on the Glanmire Solar Farm, planned for 4823 Great Western Highway, Glanmire, NSW 2795.

My name is: Emily Hennessy-Bowden

I live within a 3km radius of the proposed site.

I do NOT want the above stated solar development at Glanmire.

I am distressed and I am angry about this solar farm development.

I object to this solar development because:

1. The planned site is prime agricultural land, classified by NSW Planning as category 2 -3 productive cultivation land. This land has a history of over 100 years of demonstrated productive capacity as prime cultivation land.

2. The site sits within 5kms of Raglan residential area and greenbelt land. In 2021 NSW Planning made an amendment that recognised the need to avoid solar developments within five kilometres of residential areas and greenbelts.

3. The Glanmire site does not site within a Renewable Energy Zone. Renewable Energy Zones have been established by NSW Government, on land that is appropriate for large solar farm developments.

4. This planned development will have a significant negative impact on visitor tourism experience at the gateway to the Bathurst and the greater Central West area.

Renewable energies should not come at the cost of livelihoods, local communities, local economies and prime productive land. I want this development stopped.

Signed: [signature]

Date: 23/05/22

Email: jacinta_hb@optusnet.com.au

Phone/Mobile: 0414375563

STOP THE SOLAR FARM AT GLANMIRE

TO NGH CONSULTING

Please accept the following personal contribution to the community consultation study on the Glanmire Solar Farm, planned for 4823 Great Western Highway, Glanmire, NSW 2795.

My name is: Samuel Prasad

I live within a 3km radius of the proposed site.

I do NOT want the above stated solar development at Glanmire.

I am distressed and I am angry about this solar farm development.

I object to this solar development because:

1. The planned site is prime agricultural land, classified by NSW Planning as category 2 -3 productive cultivation land. This land has a history of over 100 years of demonstrated productive capacity as prime cultivation land.

2. The site sits within 5kms of Raglan residential area and greenbelt land. In 2021 NSW Planning made an amendment that recognised the need to avoid solar developments within five kilometres of residential areas and greenbelts.

3. The Glanmire site does not site within a Renewable Energy Zone. Renewable Energy Zones have been established by NSW Government, on land that is appropriate for large solar farm developments.

4. This planned development will have a significant negative impact on visitor tourism experience at the gateway to the Bathurst and the greater Central West area.

Renewable energies should not come at the cost of livelihoods, local communities, local economies and prime productive land. I want this development stopped.

Signed: S Prasad

Date: 22/5/22

Email: SamPrasad2000@gmail.com

Phone/Mobile: 0403744689

STOP THE SOLAR FARM AT GLANMIRE

TO NGH CONSULTING

Please accept the following personal contribution to the community consultation study on the Glanmire Solar Farm, planned for 4823 Great Western Highway, Glanmire, NSW 2795.

My name is: Elizabeth Kidd

I live within a 3km radius of the proposed site.

I do NOT want the above stated solar development at Glanmire.

I am distressed and I am angry about this solar farm development.

I object to this solar development because:

1. The planned site is prime agricultural land, classified by NSW Planning as category 2 -3 productive cultivation land. This land has a history of over 100 years of demonstrated productive capacity as prime cultivation land.

2. The site sits within 5kms of Raglan residential area and greenbelt land. In 2021 NSW Planning made an amendment that recognised the need to avoid solar developments within five kilometres of residential areas and greenbelts.

3. The Glanmire site does not site within a Renewable Energy Zone. Renewable Energy Zones have been established by NSW Government, on land that is appropriate for large solar farm developments.

4. This planned development will have a significant negative impact on visitor tourism experience at the gateway to the Bathurst and the greater Central West area.

Renewable energies should not come at the cost of livelihoods, local communities, local economies and prime productive land. I want this development stopped.

Signed: Elizabeth Kidd

Date: 21/05/22

Email: 128 Mersing road Glanmire NSW 2795

Phone/Mobile: 0498 807 674

Document 34: Letters to Mr Danziger

10 May 2021

Mr M Danziger

20 Kent Road

ROSE BAY NSW 2029

Dear Mr Danziger

Re: Glanmire Action Group

Re: Proposed Solar Site

4887 Great Western Highway, Glanmire

I refer to my letter on 11 December 2020, I am Secretary/Coordinator of "Glanmire Action Group."

We received no reply from you. Between December 2020, and now we heard nothing from Elgin Energy and some of us thought you may well have intervened to stop the subject proposal in the interest of us resident's neighbours and the Bathurst Community.

Regrettably however a few days ago Elgin mailed advising of its intention to proceed.

Again, we write to ask you not to turn your back on your neighbours but rather meet with us or a nominee to listen to our concerns.

Further, Elgin is holding an information event at your property on Friday 14th and Saturday 15th May. We ask that you agree to us also setting up an information base, to explain to attendees our-your neighbours' objections.

I look forward to hearing from you.

Regards

P Bonanno

Secretary/Coordinator

11 December 2020

Mr M Danziger
20 Kent Road
ROSE BAY NSW 2029

Dear Mr Danziger

Re: Proposed Solar Site
4887 Great Western Highway, Glanmire

I am Secretary/Coordinator of "Glanmire Action Group". Our group was formed to oppose the proposal referred to above.

You are the owner of the abovementioned site and so I am forwarding this email to you.

You, I know, are based in Sydney and have rarely, I understand, visited Bathurst and so you may not have been aware of some relevant past events or the potential impact of the subject proposal upon your neighbours and upon the broader community.

In 2017 there was a similar solar proposal for a Brewongle site just a few kilometres away. It failed but in opposing it many of us residents incurred significant expense and experienced significant anxiety in doing so.

We have, for all the time you have owned the abovementioned property, respected the fact that an owner can, within certain legal limits do what he or she wishes on his/her property. It is not uncommon however for neighbours to have respect for and regard for fellow neighbours when exercising such rights.

To the casual observer income derived by the landlord from this property has for the period of your ownership not been reinvested in the property but rather appears to have gone elsewhere. No doubt however your tenant's expenditure and indeed your tenant's primary produce has benefitted the local community and the broader population.

This email is to confirm the group's view of the consequences resulting from a solar development, as proposed, in fact proceeding.

1. The loss of highly productive cultivation land;

2. The loss of tenant's expenditure within the rural area with resulting financial loss to the community, and the loss of primary production resulting in loss to the broader population;

3. An inappropriate unsightly development at the location. This is likely to be to the financial and aesthetic detriment to neighbours and again to the broader community,

The proposal is occurring in a setting in which our State Government appears to have responded to past complaints and so has created the Central West Renewable Energy Zone. This proposal is outside the zone. The proposal ought to be accommodated within that zone.

If, on reflection, you are disposed to join our group, and/or give appropriate weight to factors mentioned above, and so invite the proponent to rescind any option or lease agreement it may have with you, then please advise us.

If you want any further detail on any matter raised before proceeding further along the course you seem to have embarked upon, then please advise and we will endeavour to assist you.

Regards

Jo Petch
Secretary/Coordinator

Document 35: E. Dawson, Town Planner Report December 2022

Our Ref.: 22101-L02_B

Glanmire Action Group
C/- Mr Jonty Boshier
Hennessy Dowd Lawyers
PO Box 697
Bathurst NSW 2795

13 December 2022

Dear Mr Boshier

GLANMIRE SOLAR FARM – TOWN PLANNING OPINION

1. This opinion has been provided in response to a letter request from Hennessy Dowd Lawyers in relation to the town planning considerations of the proposed Glanmire Solar Farm State Significant Development Application (SSD-21208499) that is on public exhibition from 18 November 2022 to 15 December 2022.

2. I have the following academic qualifications:

    a. Graduate Diploma in Bushfire Protection with Distinction (University of Western Sydney)

    b. Graduate Certificate in Development Planning (Curtin University of Technology)

    c. Graduate Diploma in Natural Resources (University of New England)

    d. Bachelor of Urban and Regional Planning with Honours (University of New England)

3. I am accredited:

    a. by the Fire Protection Association Australia (FPAA) under the Bushfire Planning and Design (BPAD) Scheme (BPAD36371) as a Level 3 Accredited Practitioner in New South Wales and Western Australia. The NSW Rural Fire Service (RFS) recognise this accreditation as "as a person who is qualified consultant in bush fire risk assessment" for the purposes of environmental planning legislation.

    b. By the Planning Institute of Australia (PIA) as a Registered Planner (NSW).

4. I have 22 years' experience working in the planning industry, with the most recent ten years also incorporating bushfire planning. My experience has been both working in the private sector for various consultancies as well as for local government and consulting for both local and state government.

5. I have reviewed the Environmental Impact Statement (EIS) prepared by NGH as publicly exhibited on the Major Projects Website[1]. It is understood the application seeks approval for construction, operation and decommissioning of a 60MW solar farm on Lot 141 DP 1144786 (the solar farm site).

6. I have viewed the solar farm site from surrounding public roads and adjoining private properties. This site inspection was carried out on Friday 2 December 2022.

[1] https://www.planningportal.nsw.gov.au/major-projects/projects/glanmire-solar-farm

7. I have also reviewed the following documents in providing this opinion:

   a. Tremain Ivey Advisory Agricultural Consultants, preliminary EIS review letter dated 12 December 2022,

   b. DR Agriculture Pty Ltd, EIS review, dated 9 December 2022,

   c. Integrated Consulting Pty Ltd, Glanmire Solar Farm – Opinion on Bush Fire Impacts, dated 13 December 2022.

8. For ease of reference, the comments in this opinion are provided in relation to the Sections of the EIS submitted with the SSD Application.

SECTION 2 - STRATEGIC CONTEXT

9. This section of the EIS has identified that there is a plethora of strategic documents that identify the need for reducing reliance on fossil fuels and a transition to renewable energy. It has not however been demonstrated, in any meaningful way, that there is strategic justification for the specific project.

10. Strategic planning is undertaken to ensure that future land uses occur in an orderly and proper location. Renewable Energy Zones (REZ) have been established throughout the state to ensure that there is a strategic approach to the provision of renewable energy projects.

11. The large area required to accommodate solar farms sees that the default location is within rural land use zones This results in a competing interest for the rural land.

12. Given that rural land is finite and becoming increasingly marginal or constrained due to climate change, it is critical that the location of non-rural developments is closely scrutinised. Such close consideration is even more important when they are located outside of an area specifically designed/set aside to accommodate such uses (i.e., the REZs).

13. The EIS appears to downgrade the land capability of the solar farm site as evidenced by the reports reviewed under paragraphs 8a and b. Such a downgrading contradicts much of the strategic justification for the site.

14. As outlined by the *Land Use Planning: Planning for Agriculture in Rural Land Use Strategies*[2], agricultural land may not be defined or mapped as State Significant Agricultural Land (SSAL), however, it may still be important from a Local Government Area (LGA) perspective. Therefore, it is considered inappropriate to dismiss the agricultural importance of a site simply because it is not mapped as SSAL or otherwise.

15. NSW Planning & Environment – Resources & Geoscience has developed mapping that shows the renewable energy resources of the state[3]. The solar farm site is located within an area that receives ~17 megajoules per square metre of average daily solar exposure. There are vast areas of the state that receive significantly more solar exposure. No justification has been provided in the EIS as to why this site is more appropriate given that it is in a location that is below the median solar exposure for the state.

[2] Department of Primary Industries (2022) *Land Use Planning: Planning for Agriculture in Rural Land Use Strategies*, Department of Regional NSW.
[3] NSW Planning & Environment – Resources & Geoscience
https://oeh.maps.arcgis.com/apps/MapSeries/index.html?appid=3b2391c554dd4478a31b88a32cec066a

SECTION 4 – STATUTORY CONTEXT

16. The solar farm site is located within the RU1 Primary Production Zone under the *Bathurst Regional Local Environmental Plan 2014* (LEP), the objectives of which are:

- *To encourage sustainable primary industry production by maintaining and enhancing the natural resource base.*
- *To encourage diversity in primary industry enterprises and systems appropriate for the area.*
- *To minimise the fragmentation and alienation of resource lands.*
- *To minimise conflict between land uses within this zone and land uses within adjoining zones.*
- *To maintain the rural and scenic character of the land.*
- *To provide for a range of compatible land uses that are in keeping with the rural character of the locality, do not unnecessarily convert rural land resources to non-agricultural land uses, minimise impacts on the environmental qualities of the land and avoid land use conflicts.*

17. The proposed development is defined as a 'electricity generating works'.

18. The land use table for the RU1 zone in the LEP is an "open" zoning table which means that all land uses are either permitted with or without consent, with the exception of a number of expressly prohibited land uses. The proposed development is not expressly permitted as a listed land use. Instead, it is permitted with consent as "Any other development not specified in item 2 or 4".

19. This "open" approach to the land use table provides greater flexibility in considering developments, however, it places greater importance on the consideration of the consistency with the overarching objectives of the zone. Clause 2.3 of requires that a consent authority must have regard to the zone objectives when determining a development application.

20. It is considered that the EIS has not demonstrated sufficiently that the development is not antipathetic to the zone objectives. In particular:

a. As outlined further below (in paragraph 27), land use conflict has not been appropriately minimised,

b. In order to maintain the rural character of the land, the development relies upon extensive vegetative screening which introduces new and different bushfire risks which have not been appropriately considered nor mitigated against (refer to document referred to in paragraph 8(c)).

c. The compatibility of the land use has not been demonstrated in terms of:

(i) The necessity to convert the rural land resource to a non-agricultural use, and

(ii) Avoidance of land use conflicts (refer paragraph 27).

21. Section 2.42 of the *State Environmental Planning Policy (Transport and Infrastructure) 2021* (T&I SEPP) requires that the consent authority cannot grant consent to a development for *inter alia* a state significant solar electricity generating works located in a regional city unless it is satisfied that the development:

(a) is located to avoid significant conflict with existing or approved residential or commercial uses of land surrounding the development, and
(b) is unlikely to have a significant adverse impact on the regional city's—

(i) capacity for growth, or
(ii) scenic quality and landscape character.

22. As outlined in paragraph 27, the EIS has not adequately considered the extent of land use conflict, nor has it demonstrated that it has been located to avoid significant conflict with the existing commercial (agricultural) uses of the surrounding land.

23. Furthermore, many of the measures proposed to mitigate other impacts (i.e. visual landscape screening) will exacerbate other impacts on and of the development (i.e. bushfire) and result in greater land use conflict (as outlined in paragraph 27).

SECTION 6 – ASSESSMENT OF KEY IMPACTS

24. In order to make the visual impacts of the development acceptable, the development relies upon the planting and on-going management/retention of significant vegetative screening along the property boundaries. As outlined in the document referred to in paragraph 8(c), the revegetation of the site will introduce a very different bushfire risk into the site and surrounds (in addition to the introduction of the solar farm itself). The bushfire mitigation measures proposed as part of the development do not provide for adequate protection commensurate with the risk.

25. The consideration of land compatibility has been largely limited to land capability and otherwise provides little real consideration of land use conflicts.

26. The reports referred to in paragraphs 8(a) and (b) indicate that land capability provided in the EIS has been downgraded. An erroneous consideration of land capability will have the effect of insinuating that the site is more suitable for a primary production replacement, such as a solar farm.

27. The Land Use Conflict Risk Assessment has not adequately considered:

    a. The introduction of additional and different bushfire risks in the locality.

    b. The practicality, feasibility, appropriateness, and effectiveness of the proposed bushfire mitigation measures in managing bushfire risk in the locality, particularly given the introduction of new hazards and risks into the locality.

    c. The loss of the adjacent property owners' ability to manage their risk (through insurance protection) by virtue of a new land use being introduced that will substantially increase the consequence[4]. This has the potential flow on effect of sterilising land around solar farms from being used for primary production which consequentially results in greater loss of primary production land beyond just the solar farm site.

28. The EIS has not adequately considered bushfire risk. It has not contemplated the additional and different risk the development is introducing through the proposed visual vegetative screening. The development has not been provided with appropriate measures in order to mitigate the resultant bushfire behaviour and impacts as outlined in the document referred to in paragraph 8(c).

SECTION 7 – ASSESSMENT OF ADDITIONAL IMPACTS

29. The absence of sufficient consideration of the matters as outlined in this submission mean that the cumulative impacts of the development have not been adequately contemplated as part of the EIS.

30. The EIS has not reasonably considered the suitability of the site for the development in terms of section 4.15(1)(c) of the *Environmental Planning and Assessment Act 1979* (EP&A Act).

SECTION 8 – PROJECT JUSTIFICATION

31. A large part of the justification for the project is based on the premise that the land is not of high agricultural value, which has been reported as incorrect (refer to 8(a) and (b)).

32. The justification is based on an inadequate consideration of impacts which, in particular, understates impacts of the development and land use conflict.

[4] I have been advised by the client that advice has been received from insurance experts to the effect that adjoining primary production properties would not be able to obtain insurance coverage if a solar farm was approved on the adjacent site as the cost of damage on a solar farm would be too great to insure against should it be proven that a bushfire originated on the adjacent primary production land and caused impact on the solar farm.

If you have any questions regarding this opinion, please contact the undersigned on 0400 940 482.

Yours sincerely

Erika Dawson
Director | BPAD Level 3 Accredited Practitioner (NSW & WA) | Registered Planner PIA

Document 36: Mr J. Armstrong Statement

Statement of John Leslie Armstrong
13 December 2022

I, John Leslie Armstrong, of 18 Landsdowne Drive Raglan NSW 2795, make the following statement:-

1. I am rural sub-contractor for West Shear Rural Contracting, a rural contractor providing spraying and fencing services around the Central West.

2. I have worked as a contractor spraying crops and pastures in the area for the last eight years.

3. My relevant qualifications include, AQF3 Accreditation - Chemical Certificate Accreditation (ChemCert Training Group) and a HR license.

4. I am familiar with the property situated at 4823 Great Western Highway, Glanmire, having sprayed the subject property on approximately 5 times over the last three years.

5. When spraying the property, I use/ operate a Unimog Truck (UL17000) with a spray boom extending from the sides of the vehicle (total 16-18 meters wide).

6. The vehicle fully laden is approximately 12 tons.

7. On Thursday 1 December 2022, I was contracted to spray 'roundup' on the property. I used the aforementioned Unimog Truck.

8. I successfully drove on the subject land, spraying 148.06ha of the property without incident.

9. The remainder of the land that was not sprayed/ driven is currently set aside for pasture/ stockfeed and did not require spraying.

10. The vehicle did not get bogged, nor significantly indent the soil.

11. I would describe the land as firm and well drained given the significant rain in the area recently.

Dated: 13-12-22

Signed: 

John Leslie Armstrong

Document 37: Letter from Mr Preshaw 5.12.2022

MDPE22/2373

Ms Karyn Taylor
karyn@goindigo.com.au

5 December 2022

Dear Ms Taylor

Thank you for your correspondence on behalf of the Glanmire Action Group to the Hon. Wendy Tuckerman MP, Member for Goulburn, regarding the Glanmire Solar Farm project. As this relates to the Planning and Homes portfolio, your correspondence was referred to the Hon. Anthony Roberts MP. The Minister asked me to respond on his behalf.

I note your concerns regarding the proposed development, including potential impacts on insurance cover and premiums.

As you may be aware, the application and Environmental Impact Statement are now on exhibition until 15 December 2022 and project documents can be viewed at : www.planningportal.nsw.gov.au/major-projects/projects/glanmire-solar-farm. I encourage you to make a submission on the project to ensure your concerns are considered in the Department's assessment of the project.

I note insurance matters are not governed by the planning system under the *Environmental Planning and Assessment Act 1979*. As such, concerns around public liability insurance are beyond the scope of the Large-Scale Solar Guidelines finalised earlier this year by the Department of Planning and Environment (the Department). You can view more information about the Guidelines at https://www.planning.nsw.gov.au/Policy-and-Legislation/Renewable-Energy/Solar-energy and in the frequently asked questions page for the guidelines at www.planning.nsw.gov.au/-/media/Files/DPE/Other/Policy-and-legislation/Renewable-energy/large-scale-solar-energy-guideline-faqs.pdf

I can assure you that the Department will be conducting its own assessment of the proposal in accordance with applicable NSW Government policies and guidelines including seeking comment from government agencies (including Rural Fire Service and Fire and Rescue NSW) and Bathurst Regional Council.

Should you have any further questions, you are welcome to contact Ms Nicole Brewer, Director, Energy Assessments at the Department on 9274 6374 or nicole.brewer@planning.nsw.gov.au.

Yours sincerely

Clay Preshaw
Executive Director
Energy, Resources and Industry Assessments

Document 38: P. Bonanno Scenic Quality Statement December 2022

Statement of Scenic Quality – P.Bonanno December 2022

Visual impact from our home and property. The Visual Impact Assessment prepared by or for Elgin Energy is grossly misleading and understated.

Their means of 'mitigating' our visual impact is unachievable. I would like it explained to me how it is possible that the tree buffer could grow to this
height shown in the photomontage R5-6: (long term 244 Brewongle Lane Glanmire).

We will directly see approximately 60-70% of the 140ha development from our home in particular our living area. This is not *low visual impact*.
The photomontage taken for Elgin of Brewongle Lane illustrates the solar panels, to be high as an average size person. They are in fact, 3.5 metres high as indicated in Elgin's EIS.
Why lie and mislead people this way?