

Subject:

FW: Proposed Glanmire Solar project SSD 2120-8499

We were previously advised that we are able to submit further input to our submissions on the project. We request that the following be added to our earlier submission:

Further to our submission on the proposed Glanmire Solar project we note that the Agriculture Commissioner's Review into Renewable Energy and Agriculture has now been finalised and request that you ensure that Elgin's response to Submissions includes specifically addressing the report and their compliance with the report, with particular emphasis on the following sections:

Fire & insurance
risks

22. Project applicants in the renewable energy sector should cover any additional public liability insurance costs incurred by neighbouring landholders as a result of proximity and risk to new energy facilities. In cases where suitable insurance cannot be obtained, the applicant should indemnify the neighbour for reasonable risk in relation to typical public liability cover.

23 The standard commercial agreement proposed in recommendation seven for neighbours should include clauses to compensate for any land use constraints imposed on neighbouring landowners through public liability insurance policies which reduce land use options, such as effectively requiring no further cropping to reduce fire risk in adjacent areas in order to secure appropriate insurance cover.

Additionally, before the project proceeds any further the proponent should be required to fulfill the requirements of Recommendations 7 to 10, specifically in relation to negotiating and obtaining neighbour agreements relating to the insurance issues and benefit sharing arrangements they propose to put in place for the project.

We further note that the NSW RFS does not have any specific or legislated guidelines relating to risks associated with Renewable Energy projects. The Country Fire Authority Specialist Risk and Fire Safety Unit in Victoria recognizes the particular risks relating to Renewable Energy projects and has researched and prepared specific design guidelines and model requirements for renewable energy projects, in particular, Battery projects. In this instance we propose that, in the absence of appropriate guidelines in NSW the Glanmire project be required to fulfill the requirements of the CFA guidelines.

Thank you for your assistance
Regards