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URBIS

LAND USE CONFLICT RISK ASSESSMENT (LUCRA) | MAYFAIR SOLAR FARM

Prepared for
ELGIN
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Acknowledgement of Country

Urbis acknowledges the Traditional Custodians of the lands we operate on.

We recognise that First Nations sovereignty was never ceded and respect First Nations peoples continuing connection to these lands, waterways and ecosystems for over 60,000 years.

We pay our respects to First Nations Elders, past and present.

The river is the symbol of the Dreaming and the journey of life. The circles and lines represent people meeting and connections across time and space. When we are working in different places, we can still be connected and work towards the same goal.

Title: Sacred River Dreaming
Artist Hayley Pigram
Darug Nation
Sydney, NSW

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1. INTRODUCTION

1.1. PURPOSE AND SCOPE OF ASSESSMENT

Urbis has been commissioned by Elgin (**the Applicant**) to prepare a Land Use Conflict Risk Assessment (**LUCRA**) to support the State Significant Development Application (**SSDA**) SSD-60074458 for the construction and operation of the Mayfair Solar Farm located in Gulgong, NSW.

This LUCRA has been prepared to address the Department of Primary Industries – Agriculture (**DPI**) request for further information identified in the Response to Submissions required by the Department of Planning, Housing and Infrastructure (**DPHI**) issued on the 28th January 2025.

DPI identified in their submission that:

- *The EIS does not include a Land Use Conflict Risk Assessment (LUCRA) despite land use conflict being a key consideration in the issued SEARs. In relation to rural land, the EIS states that potential land use conflicts are ‘unlikely, based on discussions with neighbours’.*
- *The 150-bed Temporary Workers Accommodation is to be situated on Jacksons Lane, and the EIS does not assess the potential land use conflict issues with surrounding or adjoining properties. There may be significant, if temporary, changes to local amenity and agricultural operations through (at least) biosecurity risks due to this development.*

This LUCRA has been prepared in accordance with the *Land Use Conflict Risk Assessment Guide* (NSW Department of Primary Industries, 2011) (**‘the Guide’**) and satisfies the above request from DPI.

The purpose of a LUCRA is to identify land use compatibility and potential conflict between neighbouring land uses, as well as to identify conflict avoidance or mitigation measures. The LUCRA aims to:

- Accurately identify and address potential land use conflict issues and the risk of occurrence before a new land use proceeds or a dispute arises.
- Objectively assess the effect of a proposed land use on neighbouring land uses.
- Increase the understanding of potential land use conflict to inform and complement development control and buffer requirements.
- Highlight or recommend strategies to help minimise the potential for land use conflicts to occur and contribute to the negotiation, proposal, implementation and evaluation of separation strategies.

In order to achieve those aims, a four-step assessment process has been undertaken:

1. Information gathering – gather information about the proposed land use change and associated activities, surrounding land uses and the site’s environmental characteristics.
2. Risk level evaluation – each proposed activity is recorded and potential land use conflict level is assessed. The higher the risk level, the more stringent the mitigations measures that would be required.
3. Identification of risk mitigation strategies – mitigation strategies are identified that assist in lowering the risk of potential conflict.
4. Record results – key issues, risk level and recommended management measures are recorded and summarised.

1.2. PROJECT BACKGROUND

An SSDA (SSD-60074458) was lodged with DPHI on the 6th November 2024. Development consent is sought for the construction and operation of a solar farm (Mayfair Solar Farm) and associated infrastructure to enable a generation capacity of 60MW and an associated 60/240MWh BESS.

During construction, the Project seeks to install a temporary workforce accommodation to cater for 150 construction workers to minimise demand on tourist and other short-term accommodation in the surrounding localities and to decrease the use of public services from the Mid-Western Regional Council (**MWRC**) local government area.

1.3. STRATEGIC CONTEXT

In December 2015, Australia became a signatory to the United Nations Paris Agreement on climate change. The main objectives of the Paris Agreement are to:

- Limit the increase in global temperatures to well below two degrees and pursue efforts to limit the rise to 1.5 degrees.
- Achieve net-zero emissions, globally, by the second half of the century.
- Differentiate expectations for developed nations, including Australia, that they will reduce their emissions sooner than developing nations.

The Australian Government has committed to reduce greenhouse gas emissions by 26-28% on 2005 levels by 2030. The Project would contribute to meeting the nation's international commitments to reduce greenhouse gas emissions and to Australia's effort to meet the Paris Agreement.

With the objective of delivering cheaper, cleaner, and more reliable electricity to support future growth across the state, the NSW government established the following policies:

- NSW Transmission Infrastructure Strategy (DPE, 2018).
- NSW Electricity Strategy (DPIE, 2019).
- NSW Electricity Infrastructure Roadmap (DPIE, 2020).
- NSW Climate Change (Net Zero Future) Act 2023.

These policies facilitate transitioning the state into a modern, global renewable energy superpower through privatisation and development of energy zones and renewable energy zone (**REZ**). The Project would contribute to this transition. This *NSW Climate Change (Net Zero Future) Act 2023* legislates the Net Zero Plan Stage 1: 2020-2030 (**Net Zero Plan**), which is the foundation for NSW's action on climate change and goal to reach net zero emissions by 2050. It outlines the NSW Government's approach to balancing economic growth, creating jobs and helping to achieve NSW's objective to deliver a 70% cut in emissions by 2035 compared to 2005 levels.

The Climate Change (Net Zero Future) Act 2023 legislates the targets of the *Net Zero Plan Stage 1: 2020-2030 (Net Zero Plan)*, which has served as the foundation for NSW's action on climate change and goal to reach net zero emissions by 2050. It outlines the NSW Government's approach to balancing economic growth, creating jobs and helping to achieve the State's objective to deliver a 70% cut in emissions by 2035 compared to 2005 levels.

Priority 1 of the Net Zero Plan is to drive uptake of proven emissions reduction technologies. A primary contributor to this priority is supporting NSW's movement away from fossil fuel-based energy generation and committing to new forms of renewable energy generation. To do this, the NSW Government is fast-tracking the delivery of NSW's first Renewable Energy Zones (**REZs**). The REZs are to coordinate investment and support regions open to renewable energy industry. This will involve expanding transmission infrastructure into those regions to open new parts of the grid for renewable energy projects such as wind and solar farms.

The five zones in the Central-West, South-West, Illawarra, Hunter-Central Coast and New England are and will play a critical role in replacing retiring generators in NSW over the next two decades and bringing up to 17,700 megawatts of renewable energy into the grid.

The Mayfair Solar Farm is located within the Central-West Orana REZ (**CWOREZ**). However, the Project will utilise existing transmission infrastructure rather than rely on new infrastructure delivered as part of EnergyConnect.

2. INFORMATION GATHERING

2.1. SITE LOCATION AND ZONING

The site, the subject of SSD-60074458, is identified as 204 Jackson Lane Stubbo and is legally described as Lot 2 in DP 528667 and Lot 2 in DP 734669 (the **Site**). The Site is located within the Mid-Western Regional Council local government area (**LGA**) (Figure 1) and has a land area of 217ha (while the total development footprint is approximately 123 ha).

The Site is irregular in shape, with a frontage of approximately 1.26km along Jacksons Lane on the southern boundary. The site is relatively flat, gently sloping towards Slapdash Creek in the south-east. The highest elevation of the site is approximately 440m above sea level near the Wallerawang Gwabegar Railway. The lowest elevation of the Site is approximately 420m adjacent to Slapdash Creek.

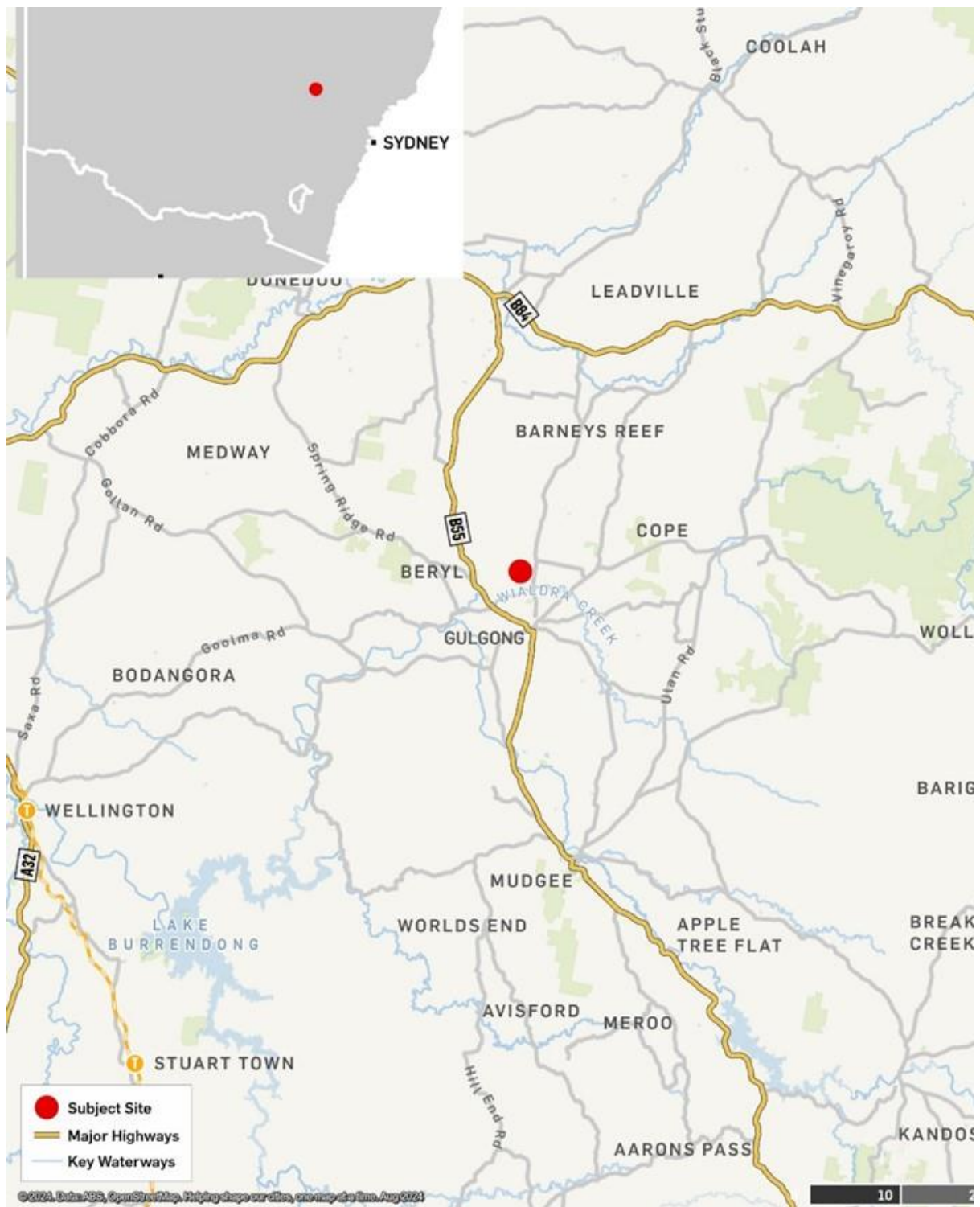
The Site is generally vacant agricultural land that has been used for grazing and cropping, and contains farm dams. A 66kV transmission line traverses the Site, and the Project will connect to this line. The surrounding locality is described below:

- **North:** open grassland used for agriculture, predominantly clear of dense vegetation.
- **East:** Slapdash Creek adjoins the eastern boundary, flowing in a general north to south direction. Two properties are located adjacent to the southeast of the Site, known as 38 Jacksons Lane, and 491 Barneys Reef Road. The owners of these two properties have been key stakeholders during community engagement as documented in the Community Engagement Outcomes report.
- **South:** the Site is bounded by Jackson Lane to the south and open grassland used for agriculture purposes and is predominantly clear of native vegetation.
- **West:** the western boundary is defined by the Wallerawang Gwabegar Railway which historically connected Wallerawang to Gwabegar. Currently only a select number of stations remain operational and the railway line is only active for freight purposes.

The Site is located approximately 5km north of Gulgong, 30km north-east of Mudgee, and 220km west of Newcastle. The region has seen a significant number of SSDAs relating to renewable energy projects. At the time of submitting the EIS, there were 23 proposed or approved SSD renewable energy projects, as well as six non-renewable energy SSD projects within 50km of the Site.

This stems from the CWOREZ attracting renewable energy and storage development proposals and investment since its creation by the NSW Government in 2021. The area was selected due to a combination of environmental, infrastructure, and socioeconomic factors, which make ideal for the development of renewable energy in the State. However, as a result, local government and communities within the CWOREZ have been increasingly experiencing pressure on their local services, due to the cumulative impacts of the proposed developments in the region.

Figure 1 Regional Map



Source: Urbis, 2024

2.1.1. Zoning

The Site is zoned RU1 – Primary Production under the Mid-Western Regional Local Environmental Plan (**MWR LEP**). *Electricity generating works* are permitted with consent in the RU1 – Primary Production zone under the MWR LEP.

The zone objectives for the RU1 zone are as follows:

- *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 visual amenity and landscape quality of Mid-Western Regional by preserving the area's open rural landscapes and environmental and cultural heritage values.*
- *To promote the unique rural character of Mid-Western Regional and facilitate a variety of tourist land uses.*

In addition, section 2.6(1)(a) of the *State Environmental Planning Policy (Planning Systems) 2021* (**Planning Systems SEPP**) identifies that electricity generating works are permitted with consent within any land in prescribed zones under the T&I SEPP, which states in Part 2.3 Development Controls, division 4, section 2.35 that:

Electricity generating works means a building or place used for the following purposes -

- (1) Making or generating electricity,*
- (2) Electricity storage*

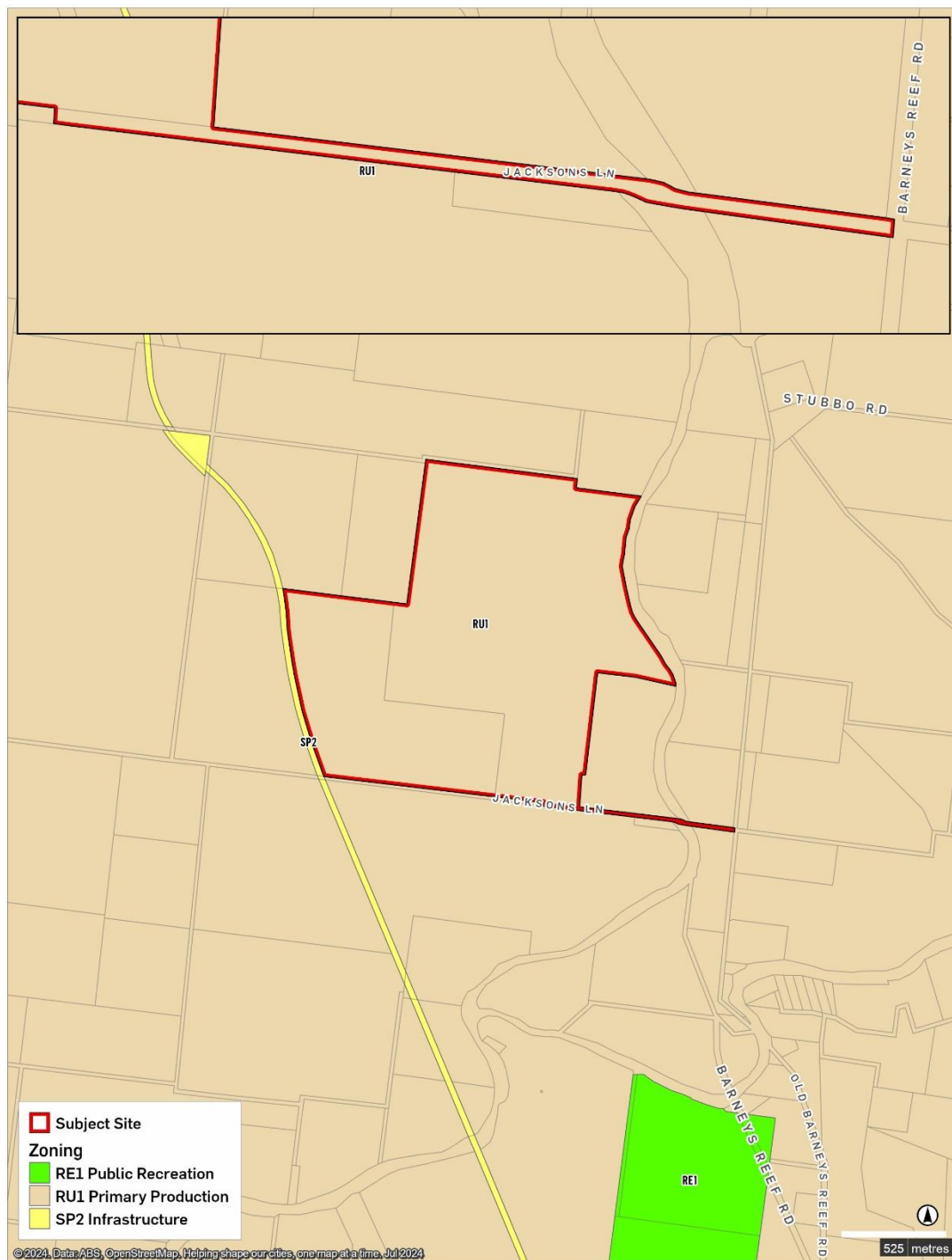
The *State Environmental Planning Policy (Transport and Infrastructure) 2021* (**T&I SEPP**) states in section 2.36:

Development for the purpose of electricity generating works may be carried out by any person with consent on the following land –

- (a) In the case of electricity generating works comprising a building or place used for the purpose of making or generating electricity using waves, tides, or aquatic thermal as the relevant fuel source-on any land,*
- (b) In any other case – any land in a prescribed non-residential zone.*

The RU1 Primary Production zone is a prescribed non-residential zone. The Project is therefore permissible with consent under section 2.36 (1) of the T&I SEPP.

Figure 2 Mayfair Solar Farm – Land Use Zoning



MAYFAIR SOLAR FARM ZONING

Source: Urbis, 2024

2.2. SITE HISTORY AND SURROUNDING LAND USE

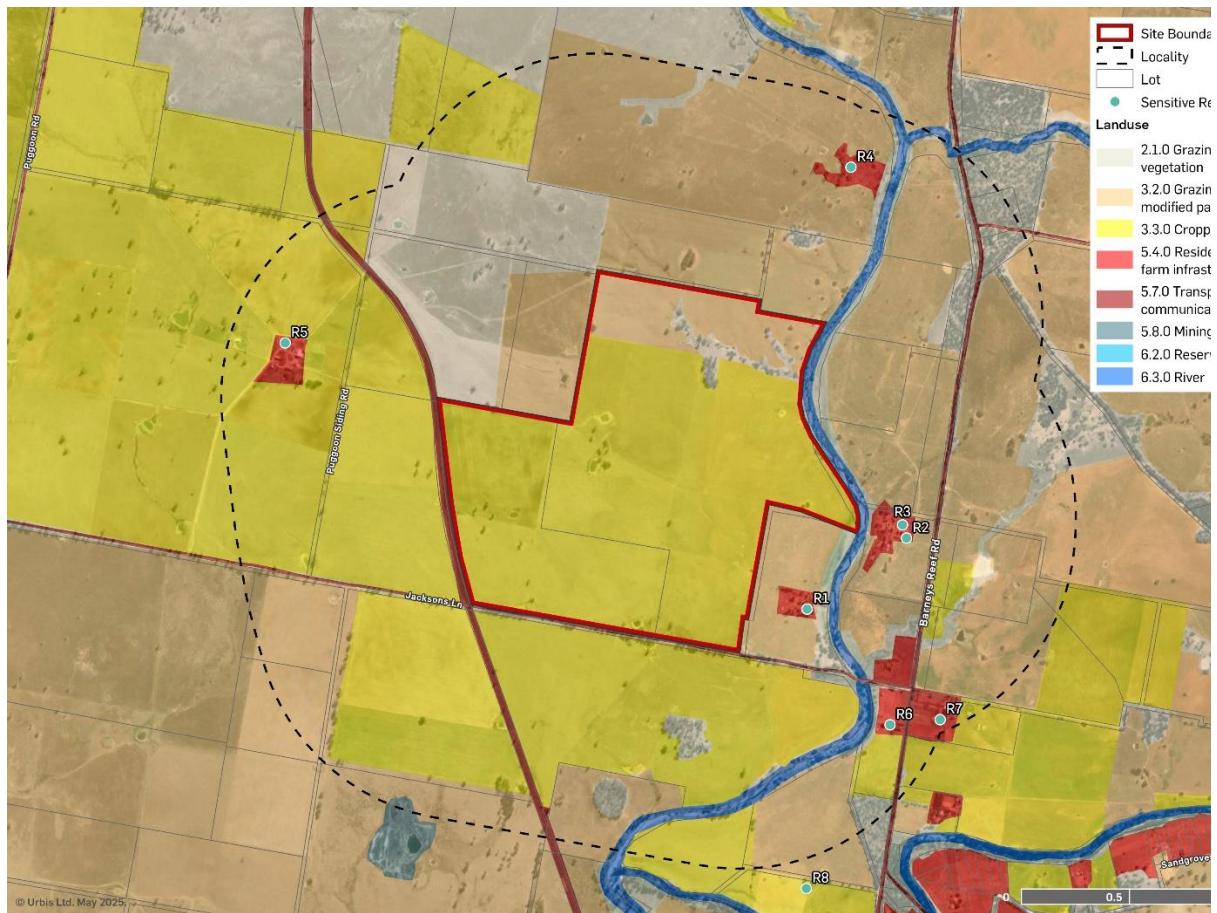
The site was purchased by the property manager approximately 15 years ago. It has been used primarily for dryland grazing of improved pastures with occasional cropping for the past 50 years. Gulgong experienced a boom in the wheat industry in the 1960's and it is understood that the area was used for wheat production during this time. Intensive wheat production across the property during this period may have caused erosion on the site. Most of the land is no longer suitable for growing grain due to issues with soil salinity and acidity, aside from the westernmost paddock near the railway line, which produces an occasional crop of wheat

The existing use of the site is for agricultural purposes. Current land management practices are primarily for rotational grazing of meat sheep and cattle, including pasture, grazing forage and occasional cropping. At the time of writing, the earliest agricultural activity is represented by cultivation by disc harrow and planting with forage oats in the northern paddocks of the land in April 2024. The southern paddocks had been cultivated and planted with forage oats approximately six weeks prior to this.

Previous use of improved pastures was evident with volunteer populations of white clover and ryegrass throughout the site, as stated in the Agricultural Impact Assessment (**AIA**) of the EIS. Discussions with the property manager indicated that the northern and western paddocks along the trainline are occasionally used for cropping wheat for grain and lucerne for hay. The rest of the site is considered to be too acidic to produce these crops and is usually only planted with forage oats or other pastures.

Directly adjacent land uses are also for cropping, grazing of modified pastures and grazing of native vegetation (Figure 3).

Figure 3 Surrounding Land Uses as per the NSW DPIE Landuse data, 2017.



Source: Urbis, 2025

2.3. DEVELOPMENT PROPOSAL

The Project includes the following components:

- Ground mounted PV modules, mounted on single axis tracking systems with a maximum height up to 3.5 metres above ground.
- A series of PCU/inverters, with underground cabling connecting each PCU to the on-site substation.
- A hybrid BESS with approximately 60MW capacity and 240MWh (four hours) storage. The BESS would be in containerised modules adjacent to the on-site substation and cover approximately 1.6 ha.
- An on-site 33/66kV substation to connect the Project to the distribution network via an existing overhead 66kV powerline.
- Upgrade and sealing of Jacksons Lane from Barney's Reef Road to the eastern most site access (approximately 1km), including replacement of the existing vehicle crossing over Slapdash Creek with a new culvert.
- Permanent supporting infrastructure including:
 - Internal access tracks.
 - Security fencing and lighting.

- Operations and maintenance buildings.
- Operational vehicle access points.
- Two 45,000 litres water tanks.
- Stormwater detention works.
- Landscaping.
- Temporary construction facilities may include:
 - Construction compound.
 - Laydown area.
 - Construction materials storage.
 - Site office buildings, amenities and temporary workforce accommodation camp.
- The temporary workforce accommodation camp, with a capacity of up to 150 workers, will include:
 - Demountable, single-storey, two- or four-person demountable air-conditioned buildings.
 - Various single-storey buildings for supporting the operations.
 - Temporary on-site utilities.
 - Car parking.

The proposed layout for the Project is enclosed in Figure 4. The final layout and design of the temporary workforce accommodation camp is subject to detailed design by an engineering, procurement and construction (**EPC**) contractor. This would be submitted to the Planning Secretary prior to construction in accordance with a condition of consent. The construction of the solar farm is estimated to take up to 12 months and will include site clearing and earthworks.

Source: Urbis, 2024



3. LAND USE CONFLICT RISK ASSESSMENT

3.1. INTRODUCTION

The LUCRA process uses a “probability and consequence” matrix to estimate the potential for land use conflict. It assesses the environmental, public health and amenity impacts according to the:

- Probability of occurrence.
- Consequence of the impact.

The risk ranking matrix presented in the Guide has been reproduced below in **Table 2**. The risk ranking matrix provides a risk ranking from 25 to 1. It covers each combination of five levels of ‘probability’ (a letter A to E as defined in Table 1) and five levels of ‘consequence’ (a number 1 to 5 as defined in Table 2) to identify the risk ranking of each impact. For example, an activity with a ‘probability’ of D and a ‘consequence’ of 3 creates a risk rank of 9.

Table 1 Risk Rating Matrix (red – highest risk; orange – moderate risk; green – lowest risk)

Probability	A	B	C	D	E
Consequence					
1	25	24	22	19	15
2	23	21	18	14	10
3	20	17	13	9	6
4	16	12	8	5	3
5	11	7	4	2	1

Source: NSW Department of Primary Industries 2011

A rank of 25 is the highest magnitude of risk, i.e., a highly likely and very serious event. A rank of 1 represents the lowest magnitude of risk, i.e., an almost impossible and very low consequence event. Priority is given to those activities listed as high risk. This will help rank multiple effects and provide a priority list when developing management strategies.

Table 2 Probability table descriptions

Level	Descriptor	Description
A	Almost Certain	Common or repeating occurrence
B	Likely	Known to occur, or ‘it has happened’
C	Possible	Could occur, or ‘I’ve heard of it happening’
D	Unlikely	Could occur in some circumstances, but not likely to occur.
E	Rare	Practically impossible

Source: NSW Department of Primary Industries 2011

Table 3 Consequences table description

Level	Measure of Consequence
Level: 1	Descriptor: Severe
Description	<ul style="list-style-type: none"> Severe and/or permanent damage to the environment Irreversible Severe impacts on the community. Neighbours are in prolonged dispute and legal action involved.
Example/Implication	<ul style="list-style-type: none"> Harm or death to animals, fish, birds or plants Long-term damage to soil or water Odours so offensive some people are evacuated or leave voluntarily. Many public complaints and serious damage to Council's reputation <p>Contravenes <i>Protection of the Environment & Operations Act 1997 (POEO Act)</i> and the conditions of Council's licences and permits. Almost certain prosecution under the POEO Act.</p>
Level: 2	Descriptor: Major
Description	<ul style="list-style-type: none"> Serious and/or long-term impact on the environment Long-term management implications Serious impact on the community Neighbours are in a serious dispute
Example/ Implication	<ul style="list-style-type: none"> Water, soil or air known to be affected, probably in the long term Harm to animals, fish or birds or plants Public complaints. Neighbour disputes occur. Impacts pass quickly Contravenes conditions of Council's licences, permits, POEO Act Likely prosecution
Level: 3	Descriptor: Moderate
Description	<ul style="list-style-type: none"> Moderate and/or medium-term impact to the environment and community Some ongoing management implications Neighbour disputes occur
Example/ Implication	<ul style="list-style-type: none"> Water, soil or air known to be affected, probably in the short term No serious harm to animals, fish, birds or plants Public largely unaware and few complaints to Council May contravene the conditions of Council or Agency approvals and the POEO Act

Level	Measure of Consequence
	<ul style="list-style-type: none"> Unlikely to result in prosecution
Level: 4	Descriptor: Minor
Description	<ul style="list-style-type: none"> Minor and/or short term- impact on the environment and community Can be effectively managed as part of normal operations. Infrequent disputes between neighbours
Example/ Implication	<ul style="list-style-type: none"> Could affect the environment or people, but no impacts noticed No complaints to Council Does not affect the legal compliance status of Council
Level: 5	Descriptor: Negligible
Description	<ul style="list-style-type: none"> Very minor impact on the environment and community Can be effectively managed as part of normal operations Neighbour disputes unlikely
Example/ Implication	<ul style="list-style-type: none"> No measurable or identifiable impact on the environment No measurable impact on the community or impact is generally acceptable

3.2. POTENTIAL INCOMPATIBILITY AND LAND USE CONFLICT

Potential conflicts may emerge from incompatible land uses being located proximate to each other or from differing interests regarding land utilisation by the occupier, with neighbouring landowners, users, or other stakeholders with vested interests in the site and its surroundings. Without the implementation of suitable mitigation strategies, a proposed development could potentially clash with adjacent land uses, activities, or environments.

To identify the potential for future land use conflicts associated with neighbouring land users and other stakeholders, the risk assessment addresses the following:

- Surrounding land uses** gathered during the preparation of the LUCRA, including:
 - Residential
 - Agricultural (including undeveloped rural land uses for grazing)
 - Infrastructure (including existing railway line, electricity transmission line and roads)
 - Natural resources (Including adjacent waterways and biodiversity values)
- Stakeholders** – including adjacent landowners, occupants, locality neighbours, or have an interest in the land. The following categories of stakeholders have been adopted for the risk assessment:
 - Private property owners
 - Business operators and owners
 - Service providers
 - Public authorities (including Council and State agencies)

- Associations (including neighbour groups)
- Indigenous community
- Other individuals from the locality
- **Conflict of interest** – in relation to the proposed development. The following categories have been adopted for the LUCRA:
 - Political interest
 - Competing industries
 - Land ownership
 - Economic interest
 - Access and traffic
 - Environmental risk
 - Perceived risk to property
 - Health and safety
 - Quality of life
 - Security and privacy
 - Amenity concern

The proposed development would change the character of the existing land use on Site from rural agricultural production to a solar farm and associated BESS. Notwithstanding, important electrical infrastructure and associated impacts already traverse the Site. It is also envisioned that once the project reaches the end-of-life cycle, the Site would be decommissioned and returned back to agricultural activities.

It should also be noted that the proposed project does not entail a complete lack of consistency with the surrounding land uses. Agrivoltaics, and in particular sheep grazing within the solar farm complex, is proposed as part of the operational phase, which will continue leveraging the agricultural resources of the Site. Although no details have been gathered as part of a Sheep Grazing Plan, it is expected that this will be prepared during the post-approval phase which will include information about the extent, duration and preferred grazing schedules compatible with the project.

The impact of visual changes on the amenity of the surrounding area has been a common cause for concern during the exhibition period of the State Significant Development Application. Visual impacts of the proposed development were assessed by Urbis in the Visual Impact Assessment (**VIA**) and Landscape Management Plan which were prepared to support the EIS. The Landscape Management Plan was prepared with the objective of mitigating the impacts as assessed in the VIA on adjacent sensitive receivers, with proposed plantings consistent with the local landscape character.

The VIA considers the amenity of adjacent development, the surrounding properties and key scenic quality of the surrounding landscape. The low height of the project components, and the Site's location within a predominantly flat area means that in most potential views from surrounding public roads or isolated elevated locations, its form, linear nature and scale are deemed compatible with the form and vast horizontal scale of the open landscape. The proposed perimeter planting is visually consistent with the roadside and boundary plantings which characterise the Site and surrounding land character zones.

The project is compatible with existing and anticipated future development within the CWOREZ, including the proposed transmission network upgrade as part of the EnergyCo program. Beryl Solar Farm (approximately 6km south-west of the Project) includes infrastructure that is of a compatible scale, height and form and in views inspected from roads surrounding this facility, is visually similar to the Project.

3.3. LAND USE CONFLICT AND RISK MATRIX

The full Land Use and Conflict Risk Matrix is provided as part of this assessment in Table 4:

Table 4 Land Use and Conflict Risk Matrix

Type of Land Use	Affected Stakeholders	Category	Potential Conflict	Unmitigated Risk Rating			Risk Reduction Management Strategy	Mitigated Risk Rating		
				Probability	Consequence	LUCRA Rating		Probability	Consequence	LUCRA Rating
All Land Uses	All Stakeholders	Health and Safety – Fire	Land users in the locality may be concerned about the potential risk of fire occurring from the solar farm equipment and BESS and spreading to the surrounding land.	C	3	13	<ul style="list-style-type: none"> Potential hazard risks have been considered as part of a Preliminary Hazard Analysis (PHA) accompanying the EIS. The PHA identifies that the associated risks are not considered to exceed the relevant risk criteria. Compliance with mitigation measures as identified in the PHA and the Bushfire Report will decrease the risk of uncontrolled ignition and fire propagation. When approved, subject to conditions of consent, it is anticipated that an Emergency Plan, Fire Safety Study and Operational Management Plan will be prepared and implemented to appropriately manage hazard fire risks during operation. 	E	3	6
		Health and Safety – Flooding	Although no significant changes to the topography will occur, the project and associated earthworks have the potential to alter the extent of existing flood behaviour on the land.	C	3	13	<ul style="list-style-type: none"> Potential flood impacts have been considered as part of a Flood Impact Risk Assessment (FIRA) prepared under the Flood Planning Guideline LU01 and robust modelling for different worst-case scenarios accompanying the EIS. The FIRA identifies that the associated risks can be appropriately mitigated subject to the implementation of mitigation measures, including appropriately placed swales and cut-off drains. Compliance with mitigation measures as identified in the FIRA will significantly decrease the risk of flooding downstream and/or adjacent properties. When approved, subject to the conditions of consent, it is anticipated that Stormwater Management Plan will be prepared incorporating the mitigation measures of the FIRA and implemented to appropriately manage this risk during operation 	E	3	6
		Health and Safety – Electro-magnetic Field (EMF)	The electrical infrastructure components of the project may increase electromagnetic fields in the area .	C	4	8	<ul style="list-style-type: none"> Potential risks considering the EMF have been considered as part of the PHA accompanying the EIS. The PHA identifies that the associated risks are not considered to exceed the relevant risk criteria. It is believed that the project will not significantly enhance the existing EMF, which may already exist at high levels on the 	C	4	8

Type of Land Use	Affected Stakeholders	Category	Potential Conflict	Unmitigated Risk Rating			Risk Reduction Management Strategy	Mitigated Risk Rating		
				Probability	Consequence	LUCRA Rating		Probability	Consequence	LUCRA Rating
Residential	<ul style="list-style-type: none"> Private property owners Public Authorities Other Individuals from the locality 						<p>site due to the existing 66kV transmission line.</p> <ul style="list-style-type: none"> No explicit mitigation measure has been identified in the PHA as being required although ongoing monitoring during operation will be maintained to ensure appropriate safe threshold levels are not surpassed. 			
		Competing industries – Cumulative impacts	The construction of the solar farm and BESS may cause competing demands for labour and accommodation in the locality and region, particularly as a result of cumulative demand from other proposed renewable energy projects.	A	3	20	<ul style="list-style-type: none"> A Social and Economic Impact Assessment (SEIA) and a Workforce Accommodation Plan (WAP) have been prepared as part of the EIS phase. The SEIA and WAP evaluate community and economic conflict and benefits of the project and propose strategies to mitigate the wider cumulative impact. Consideration is made to maximise the employment of local workforce where available, but measures for the provision of a workforce accommodation camp on site are proposed so that any out of region workers will not cause adverse impact on local accommodation. Compliance with mitigation measures as identified in the SEIA and WAP, including the provision of an on-site workforce accommodation camp that will be self-contained, will significantly decrease the cumulative impacts of the project on the locality. 	B	4	12
		Access and traffic	<p>During construction, the project will create traffic-related issues involving access to and from Jacksons Lane and on Barney's Reef Road.</p> <p>Movement of construction vehicles, traffic controls for Oversized Vehicles and movement of workers may hamper traffic fluidity in the local road network temporarily.</p>	A	4	16	<ul style="list-style-type: none"> A Traffic Impact Assessment has been prepared as part of the EIS phase. The TIA has identified that the local road network can accommodate the predicted traffic levels, even when taking into account the cumulative effect of surrounding projects. Compliance with mitigation measures as identified in the TIA and proposed road upgrades will significantly decrease the negative traffic impacts of the project on surrounding properties. A Traffic Management Plan will be implemented during the construction phase to ensure the orderly vehicle movement into and from the project site. 	A	5	11
		Amenity Concern – Noise	Noise generated by construction activities and vehicle movements,	B	3	17	<ul style="list-style-type: none"> A Noise Impact Assessment (NIA) has been prepared as part of the EIS phase. The NIA 	C	4	8

Type of Land Use	Affected Stakeholders	Category	Potential Conflict	Unmitigated Risk Rating			Risk Reduction Management Strategy	Mitigated Risk Rating		
				Probability	Consequence	LUCRA Rating		Probability	Consequence	LUCRA Rating
			including the temporary workforce accommodation camp; and noise generated by trackers and inverters during operation may be perceived as nuisance.				<p>has assessed both noise impacts during construction and operation and proposed appropriate mitigation measures for both phases, which were validated with a solid modelling approach.</p> <ul style="list-style-type: none"> Compliance with mitigation measures, including the use of silencer kits, would ensure that no noise impacts are anticipated onto the nearest sensitive receivers. A Construction Noise Management Plan will be implemented during construction to ensure noise impacts are minimised and appropriately handled from the construction activities and workforce accommodation camp. 			
		Amenity Concern – Visual	The project may affect the visual amenity of the local area by altering the landscape character of the scenery.	C	3	13	<ul style="list-style-type: none"> A VIA has been prepared as part of the EIS phase. The VIA has assessed the visual impact of the project onto the local landscape. A Landscape Management Plan has been prepared to minimise any visual impact onto the identified sensitive receivers, including new planting and requirements for maintenance. 	C	4	8
		Quality of Life	Combined perceived or real residual impacts on amenity (including from visual, noise, economic, etc) from the project may impact on wellbeing and result in a loss of quality of life for some adjacent or local residential users.	C	3	13	<ul style="list-style-type: none"> Consideration of wellbeing impacts have been taken as per the SEIA, which has assessed it against the proposed mitigation measures for amenity and safety concerns. Upon implementation of all listed measures, it is considered that the quality of life of local users will not be negatively affected. 	D	4	5
		Security and Privacy	Privacy and security issues may temporarily arise as a result of the workforce accommodation camp.	D	2	14	<ul style="list-style-type: none"> A strict code of conduct will be in place during construction phase to direct and control workforce behaviour and where misbehaviours are recorded they are appropriately managed with utmost decisiveness. The site manager will nominate one or several overseers to cooperate with local law enforcement when needed. 	D	3	9
		Economic Interest	Increased demand for services, goods and infrastructure may have both overlapping negative and positive effects on the local economy.	C	3	13	<ul style="list-style-type: none"> Economic impacts have been assessed in the SEIA, with consideration of the proposed mitigation measures against the availability of services and other economic goods. The EIS outlines measures, such as the WAP, Waste Management Plan and other 	C	4	8

Type of Land Use	Affected Stakeholders	Category	Potential Conflict	Unmitigated Risk Rating			Risk Reduction Management Strategy	Mitigated Risk Rating		
				Probability	Consequence	LUCRA Rating		Probability	Consequence	LUCRA Rating
Agriculture	<ul style="list-style-type: none"> Private property owners Business operators and owners Associations Other Individuals from the locality 						servicing measures, that will be implemented during construction and operation to decrease the negative impact on the local economy. These measures will be further detailed as part of the project's Environmental Management Plan once approved.			
		Competing industries – land availability	Agricultural users may have concerns that a decrease in the overall regionally available agricultural land may have an important impact on the total agricultural output.	D	4	5	<ul style="list-style-type: none"> Consideration of agricultural impacts has been taken as per the Agricultural Impact Assessment (AIA). The AIA concludes that, although localised impacts may occur if unmitigated, land availability for agriculture will not be significantly hindered as a result of the project. 	D	4	5
		Competing industries – land impact	Agricultural users may have concerns that the local land capability will be affected for future agricultural uses.	C	3	13	<ul style="list-style-type: none"> Consideration of agricultural impacts has been taken as per the AIA. which concludes that, although localised impacts may occur if unmitigated, the current land capability is not of good quality in its current state. Notwithstanding, the project will implement all listed mitigation measures in the AIA during construction and operation so that the land capability for agricultural purposes can be regenerated. A key mitigation is the proposed continuation of sheep grazing on site (agrivoltaics activities) that will maintain agricultural uses and contribute to maintenance of vegetation on site during operation. A Decommissioning Management Plan will be prepared to outline the measures needed to recover all project equipment and materials from the land and to return the land to its previous state prior to construction. 	D	3	9
		Amenity concern – Noise	Agricultural users may have concerns about livestock behaviour as a result of increased noise generation from the project.	C	3	13	<ul style="list-style-type: none"> A Noise Impact Assessment (NIA) has been prepared as part of the EIS phase. The NIA has assessed both noise impacts during construction and operation and proposed appropriate mitigation measures for both phases, which were validated with a solid modelling approach. Compliance with mitigation measures, including the use of silencer kits, would ensure that no noise impacts are anticipated on the nearest sensitive receivers. 	D	3	9

Type of Land Use	Affected Stakeholders	Category	Potential Conflict	Unmitigated Risk Rating			Risk Reduction Management Strategy	Mitigated Risk Rating		
				Probability	Consequence	LUCRA Rating		Probability	Consequence	LUCRA Rating
		Environmental Risk – Biosecurity	Agricultural uses may have concerns about the project increasing the accidental spread of weeds, pathogens and pests if not appropriately managed.	C	3	13	<ul style="list-style-type: none"> A Biodiversity Development Assessment Report (BDAR) has been prepared as part of the EIS. The BDAR has taken into consideration the potential spread of weeds, pathogens and pests and it has included several mitigation measures for its avoidance. Compliance with mitigation measures, including hygienic and quality control protocols, will ensure that no biosecurity impacts arise from the project. A Biodiversity Management Plan (BMP) will be prepared prior to construction with measures to combat the propagation and eradication of any identified biosecurity risk. The site manager, or a nominated representative, will continuously audit and report that compliance with construction and operational measures are followed for the successful implementation of the BMP. 	D	3	9
Infrastructure	<ul style="list-style-type: none"> Public Authorities Service Providers Other Individuals from the locality 	Perceived Risk to Property – public roads and railway	Stakeholders may have concerns that construction activities and Oversized Vehicle movements may damage existing public roads infrastructure.	C	3	13	<ul style="list-style-type: none"> A dilapidation survey of the local road network and other public infrastructure will occur prior to construction. The applicant will be required to repair any accidentally affected infrastructure as a result of the development. The TIA has included an Oversized Vehicle route, and appropriate traffic controls will be implemented to ensure the orderly delivery and transport of construction materials. 	C	5	4
		Land ownership	Public Authorities, such as Council and Transport for NSW, may have concerns about the use of land they own or manage. In this instance, the proposed upgrade of Jacksons Lane and the intersection with Barneys Reef Road.	C	4	8	<ul style="list-style-type: none"> Consultation with all relevant agencies has been undertaken during the EIS phase and will continue to ensure all concerns raised are being discussed and addressed adequately. A s138 consent request will be submitted prior to any works on publicly owned roads, which will ensure concurrence with any proposed works. 	C	5	4
		Environmental Risk – Biodiversity Loss	Land reserved for natural resources (including biodiversity preservation) may be affected by a permanent or temporary loss of biodiversity.	C	3	13	<ul style="list-style-type: none"> A BDAR has been prepared as part of the EIS phase. The BDAR has taken into consideration measures to avoid, minimise and mitigate the loss of biodiversity as a result of the project. Compliance with mitigation measures, including pre-clearing surveys and re- 	D	3	9

Type of Land Use	Affected Stakeholders	Category	Potential Conflict	Unmitigated Risk Rating			Risk Reduction Management Strategy	Mitigated Risk Rating		
				Probability	Consequence	LUCRA Rating		Probability	Consequence	LUCRA Rating
							planting, will ensure that no net loss of biodiversity occurs as a result of the project. <ul style="list-style-type: none"> A draft Vegetation Management Plan (VMP) has been prepared as part of the EIS, outlining proposed re-planting and enhancing the biodiversity values of the land to ensure a nature positive outcome. The site manager, or a nominated representative, will continuously audit and report that compliance with construction and operational measures are followed for the successful implementation of the VMP. 			
		Competing industries – mining	There is a current mining exploration licence over part of the Site, which could create conflict should the holder seek to undertake exploration and future mining.	C	3	13	<ul style="list-style-type: none"> Consultation with the current title holder and the review of existing documentation have occurred. . Ongoing consultation with the current title holder will continue as necessary to ensure no conflict arises as a result of future plans. 	D	3	9
		Environmental Risk – Water Resources	Land reserved for natural resources (including adjacent water ways and groundwater resources) may be affected by the construction activities	C	3	13	<ul style="list-style-type: none"> An Aquatic Impact Assessment has been undertaken as part of the EIS phase. The assessment has detailed mitigation measures to ensure that no impact on the aquatic fauna and flora as a result of the construction activity over and near Slapdash Creek. The Flood Impact and Risk Assessment details mitigation measures to minimise sediment runoff onto adjacent waterways. A Groundwater Impact Assessment has been prepared as part of the EIS phase. The assessment has detailed mitigation measures to ensure that no impact on the groundwater resources occurs as a result of the project. Compliance with mitigation measures, will ensure that no impacts on the local water resources result from the project. 	D	3	9

4. CONCLUSION

The LUCRA has identified all the potential land use conflicts with the project and evaluated their risk. The overall risk rating, upon the implementation of risk reduction management strategies, ranges from low to moderate.

A total of 19 potential land use conflicts were identified. The initial risk ratings for each use were:

- Three high risk instances.
- Thirteen moderate risk instances.
- Three low risk instances.

The revised ratings upon the implementation of risk reduction management strategies are predicted to be:

- Two moderate risk instances.
- Seventeen low risk instances.

The average risk rating will be able to be reduced from moderate (12.84) to low (7.79) upon the implementation of the proposed management and mitigation measures. As such, the project is capable of being consistent with the LUCRA objective to lower the risk rating score to 10 or below.

Outstanding moderate risk conflicts relate to the following:

- All users – Competing industries, cumulative impacts.
- Residential users – Access and traffic.

This stems from the required construction traffic of proposed projects. A comprehensive Traffic Management Plan will be in place to address management measures during construction, operation and decommissioning to ensure traffic risks and impacts on the local road network are minimised and mitigated as soon as they arise. The Traffic Management Plan will undergo internal review and auditing to ensure its effectiveness during all stages.

The implementation of appropriate mitigation measures and management strategies during construction, operation and decommissioning, will likely minimise the risk of potential conflict with the assessed interested stakeholders and land users.

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