

Solicitors & Barristers.

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The Minister for Planning & Public Spaces
NSW Government.

Attn: Mr. Nestor Tsambos

Battery & Solar Assessments rita.hatem@planning.nsw.gov.au

Submission as uploaded to the NSW Planning Portal.

Dear Sirs,

RE: Ap; SSD-79747209 291 Garoo Road Garoo NSW

We act for Mr. Paul McCulloch. He is the owner of the adjoining farm called "Danibe", and located at 848 Garoo Roads Garoo NSW 2340.

Our Client objects on every possible ground to this proposed development. The attached letter (marked "A"), dated 8TH May 2025 contains a Summary of some of our Client's Grounds for Objection.

We also wish to refer to the enormous body of Scientific, Ideological, Commercial and Community based Objections and adverse arguments that are already part of the Public Discourse on the contentious proposal.

The "Danibe" Farm immediately adjoins the proposed Solar Farm property, and the Main Battery will be some 300 Metres from our Client's home, the farm's house. Our Client will never agree to or cooperate with this outrageous proposal. This has been made very clear to all Stake Holders for over a year now.



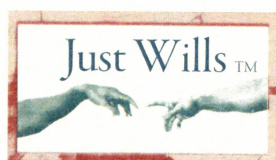
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Just for some background, as to our Client's credentials in standing up for the Local Community, and rejecting this proposal:

1. The "Danibe" farm consists of six (6) separate Torrens Land titles, joined under the one ownership. (Consolidated since around the 1980's). It shares a complete 'east-west' boundary with the proposed project.
2. The Solar Farm will have a dramatic and adverse impact on the quality of Life and farming options available on our Client's farm. It will create Fire dangers, Pollution and future uncertainty.
3. It will poison the Natural atmosphere and aesthetics of the whole area. It will greatly reduce the Value of the adjoining Property (with no likelihood of any compensation.).
4. Such a project could be located in less usable and less developed Farm Land areas.
5. Stealing this blue-ribbon, highly productive, and long established Farming and grazing land, with its many generations of Family traditions and dedicated production networks, would be a seriously wrong and detrimental Town Planning decision.
6. Any such decision or approval would reveal an utterly corrupted and degenerate moral, ideological and Land Utilisation prospective and practise. The dishonest capture of NSW Planning mechanisms by mercenary, foreign, Commercial interests.!
7. The whole 'net-zero' & 'renewables' & the climate-change "rent-seeking" Scam is being used to capture, destroy & profit. Not to help the survival of the country and the productivity of Australia.
8. As to sentimental and heritage aspects of this Objection: please note that our Client's Great Grandfather first purchased farming land in the Tamworth District in 1876. Paul's wife is a descendant of the Walters Farming Family, who have been substantial Land Holders in the district continuously since 1866.



9. This proposed development would seriously jeopardise the ongoing viability of this Farming Dynasty; as these Farms and the whole fertile and productive district, MUST be preserved for the (next) sixth generation of Farmers to continue on there.

CONCLUSION

Please refer to the attached letter for further Grounds of Objection.

Our Client, and his local supporters will be strenuously rejecting, Objecting and hindering this proposal at every stage of its DA and Exhibition consideration process.

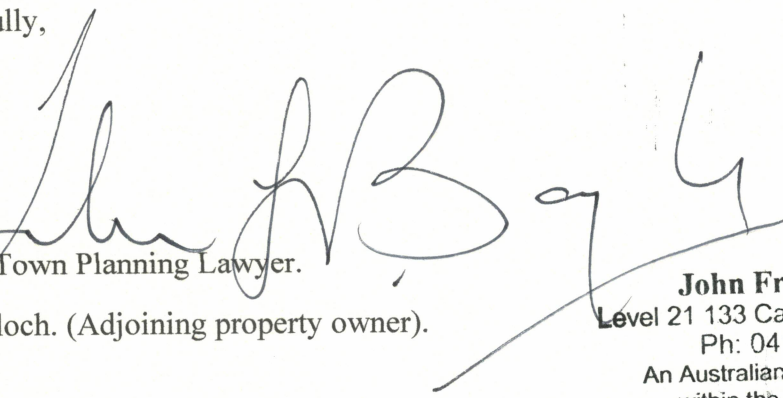
Yours faithfully,

John Boyle.

Environmental and Town Planning Lawyer.

for Mr. Paul McCulloch. (Adjoining property owner).

19th March 2026.



John Francis Boyle
Level 21 133 Castlereagh St Sydney
Ph: 0418 404 222
An Australian Legal Practitioner
within the meaning of the
Legal Profession Uniform Law (NSW)

ENCLOSED. 3 page Submission letter dated 8th may 2025. ✓

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8-5-25

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To: Environmental Resource Management Pty Ltd.

Level 14, 207 Kent Street Sydney nsw 2000 &

To: The NSW Manager.

GreenPulse Solar Farm & BESS Unit Trust.

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cc: pmcdanibe@gmail.com erm.anzsupportservicesmailbox@erm.com

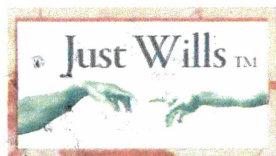

Dear Sirs,

RE; Objection to proposed Solar Farm Garoo Tamworth NSW

We act for Mr. Paul McCulloch and associated local Parties. We have reviewed the Scoping Report dated 30-1-25. Our Client and his immediate Family hold many (at least 4 or 5 complete Titles) working farming properties immediately adjacent to the proposed development. His main Farm "Danibe" is directly next door. They are an original Tamworth Pioneer Farming Family; from before the 1940's, and now 3rd & 4th generation occupiers.

They strongly object to the proposed development. It will be opposed by local Community Groups and Local Government activist at every stage. This is all prime and highly productive Farming Land. Your Client's efforts and resources would be FAR better placed exploring any of the countless, sparsely occupied areas, rocky and barren landscapes in that vicinity.

Any attempt to develop in this Fertile, Blue Ribbon, conservative and long Family Held location is doomed; it will be challenged *on the ground*, and through all possible legal avenues and tactics. Nil cooperation for access or services should be expected!



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we are instructed to note, (just some passing observations here):

- i. Engagement Feed back (page 42 clause 5.4.2) refers to Table 5-3. That Table however, refers only to Matters of National Significance; there are **no** "engagement feedback" details noted there. (Many such hollow references.)
- ii. The actual contents of the "National Significance" parts are pointlessly **generic & not localised**; nothing gives that information any real local relevance or applicability. (One could say "...just made up!")
- iii. The Report's annexure referring to Social Impact Assessments (SIA) (for the area containing the project area and those adjacent), sights Gain production and Beef cattle production being at least 20% of land use. (That figure and many others there being hotly disputed as being minimised, inaccurate /incomplete.) That admitted fact alone, in itself, should rule this location as utterly unsuitable and unacceptable for the proposed development.
- iv. This is a sensitive and delicate Animal breeding environment. The level of **noise, vibration, dust, reflective GLARE, run off, traffic, and scary structures , etc, would kill this area for serious Sheep & Beef raising Farming, the increased pollution would destroy safe Grain farming.**
- v. **Lose of scenic views (the Canola/Rape Seed fields in full yellow bloom are a well known international tourist attraction), and natural amenity, and the destruction of aboriginal heritage, etc, etc** have not been seriously investigated and full Impacts admitted. (Seriously! Don't waste your Client's Funds and time on it ! It's a real dud concept.
- vi. The SIA (eg. Annexure, page 14) are all strongly **negative!** Your fanciful suggestion of some fantasy *Community Benefit Fund*, is a cynical and cruel hoax! It's ALL down side!

- vii. The coloured graph at (SIA annexure) page 14, (right at the end of the Report.) states the adverse & negative **Impacts will be Certain, Major, Very High (& wait for it...) Transformational.** That's "case closed!" here!
(And that is BEFORE the real Truth is even told!)

The project has Nil chance of getting any further approvals.

Conclusion

- a. Over all the Scoping Report, is uselessly-generic, factually evasive, full of self-serving cliches and vacuous/fact-less Box-Ticking, references that lead nowhere, and general (planning & impact) obfuscation. It's cynical style of feeding off the Governments' corrupt addiction to the 'renewables' myth, and the Ideologically degenerate claims of "social good of Green power" is cunning but sadly implausible!
- b. Neither the purported Project information Website nor the 1800 community response phone number referenced are connected. It's all fluff & gloss and sizzle and NIL real applicable Local relevant substance.
- c. If you are seeking feedback, this is it. 100% of the local occupiers and Land Owners will oppose this development.
This is an Anti-Renewable, Conservative, National Party heart land. If THAT does not scare your Client off; they are also ALL cashed up, and well connected to Environmental Defender City Law Firms.
- d. These Families have not slaved to create this glorious and Safe Farming environment for 100 years to have some opportunistic bunch of greedy foreign investors come and steal their World from them!
We are all Down for it!

Yours Faithfully,
John Boyle.
Environmental Law Principal.
For the McCullochs.

8th May 2025.

John Francis Boyle
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An Australian Legal Practitioner
within the meaning of the
Legal Profession Uniform Law (NSW)