



Our Ref: RHG:26053
Your Ref: SSD-79747209

30 March 2026

NSW Department of Planning, Housing and Infrastructure
Locked Bag 5022
PARRAMATTA NSW 2124

Dear Sir/Madam

Objection to Garoo Solar Farm

I act for Daniel & Karina McCulloch. My clients own two properties on Garoo Road, Garoo.

My clients **strongly object** to the Garoo Solar Farm proposal.

My clients have owned "Noorumboon" 903 Garoo Road, Garoo (Receptor R3) and "Gemma" 418 Garoo Road, Garoo (Receptor R7) for 5 years, having acquired these properties from family members - these farms have been owned by the same family for generations. My clients operate a local stock & station agency and run beef and cattle grazing primary production enterprises on the properties (as well as in neighbouring areas). Mr McCulloch's family has been farming in the Tamworth district since the 1860s.

With both of my clients' Garoo properties being located within 2km of the project, my clients are extremely concerned about the amount of traffic & dust the proposed development will generate. The soil types found in the Garoo area are highly fertile yet form almost a powder when dry. The 250 strong proposed workforce for the solar farm construction & associated vehicle movements will significantly increase the amount of dust thrown into the air and across my clients' paddocks and residences. Page 15 of the EIS indicates there will be up to 292 vehicle movements per day during the construction phase which my clients submit is conservative given the number of employees.

The traffic study in Appendix P indicates that during peak hours currently only 38 vehicles enter or exit Garoo Road from the New England Highway (page 15). During construction, the peak hour traffic volume will increase to 124 as a minimum and this could increase substantially if the tradesmen working on site do not live on site in the accommodation camp, and on Fridays/Mondays as they leave & return. Even on the conservative estimate of 124 vehicles during peak hours, this is a 226% increase on current levels for Garoo Road alone. This level of traffic is a safety concern for local residents & wildlife as well as having a significant noise impact.

The proposal includes 26km of internal access roads that will create a dust burden. This is both a health issue for people (apart from breathing it in the dust accumulates on roofs and affects the quality of rain water) & animals (the dust is inhaled by livestock and it also settles on pasture, crops, dams and livestock troughs where sheep & cattle are forced to consume it, as well as impacting on wool fleece quality). It is also an inconvenience as the dust will enter my clients' house and yard and must be cleaned up.

The EIS suggests the dust issue will not have a "significant impact" (page 197) as suppression measures such as watering the internal tracks will be undertaken. The developer proposes to obtain the 20.9 megalitres of water required for dust suppression & road construction from Tamworth Regional Council & Liverpool Plains Shire Council. Given the local councils regularly advise residents that road grading cannot be undertaken due to lack of water, it would be unjust if the councils are prepared to supply sufficient water for multiple daily water carts to suppress dust to the developer. Furthermore, my clients can categorically indicate that daily watering will do little to impede the dust and only laying a bitumen surface on the internal access roads will eradicate all dust in the area.

My clients also believe it laughable that the developer will use rainwater for cleaning the solar panels once constructed – in the current month of March, my clients have had 5mm of rain on their properties. Whilst my clients would like to say "good luck cleaning 234,000 solar panels with a thimble of water", the reality is the developer will source the required water from elsewhere and be using this precious commodity to the detriment of the local environment and landscape as well as community.

As primary producers holding livestock accreditations for their sheep and cattle enterprises, biosecurity is also a worry for my clients. With 250+ workers travelling past nearby farms there is a high risk of stock disease or weeds being brought into the area. Will the developer be compensating neighbours if an outbreak occurs due to their workforce being negligent?

The project also brings a heightened risk of theft to local farms. Presently, our clients can identify an unusual vehicle or out of the ordinary occurrence due to the limited amount of traffic on the roads. However by adding 250+ workers this will become impossible. This is not to say that the development workforce will be thieving, but rather that it will be easy for would-be thieves to disguise their movements and my clients fear theft of equipment, livestock and fuel (particularly given the high petrol & diesel prices resulting from the Middle East conflict) will increase if the project proceeds.

The BESS proposal also has significant noise and bushfire implications.

Why are all of these detrimental impacts imposed on the Garoo community when the area is not in the New England Renewable Energy Zone?

My clients feel there has been negligible compensation offered to neighbours who will now be living in an industrial rather than a rural setting. If my clients hold off selling out, they may see land prices plummet and any capital improvements to their farms will likely not be reflected in the purchase price. However if my clients sell out now and the solar farm doesn't proceed, they have lost the opportunity to continue farming and passing on their asset to the next generation. My

clients will essentially be in limbo as they do not wish to make any improvements to their farms (eg. sheds, yards, silos) or houses as there is no guarantee landholders will be compensated for capital works. This presents a real life opportunity cost.

Page 183 of the EIS indicates “the Applicant intends to utilise livestock grazing to maintain a low fuel state around Project Infrastructure”. An agri-solar commitment would give adjoining landholders some comfort in knowing that weeds could be controlled by grazing animals, rather than requiring copious amounts of chemical spraying to combat invasion of weed species. This is however dependent on the host landowner continuing grazing activities under an agricultural co-use agreement. At the same time, it is questionable whether agri-solar is possible as there will no doubt be wire/metal/glass fragments on the ground following the installation of the solar panels which could be consumed by sheep grazing beneath the panels and cause illness and/or death. There is also the likely discolouration of wool caused by animals rubbing on the support posts as well as the impact on the boundary fencing as animals rub on the wires.

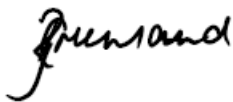
Input from the Australian Livestock Production Assurance (LPA) programme is also required as to the impacts of agri-solar on the credibility of Australian red meat marketed to the world. Further investigation is required regarding the heatbank effects on livestock grazing under panels as well as the health impacts of human consumption of meat raised within areas with such high electric & magnetic fields. This could well become an RSPCA issue.

Page 217 of the EIS notes the burden of the “cumulative social impacts” given at least five other renewable energy developments in the area. From personal experience and witnessing the effect on family & friends, my clients can categorically confirm the proposed solar projects are causing high levels of stress and anxiety for local landholders and my clients & I fear for the mental health of local residents, particularly neighbouring landholders who feel disenfranchised by this process.

My clients appeal to the Department to inspect their beautiful farms on a site visit before any determination is made in relation to the proposed Garoo Solar Farm. They further seek meaningful compensation by the developer to neighbours to take into account the detrimental impacts of the project including loss of property values, dust and loss of rural amenity.

Yours faithfully

Greenland Law & Conveyancing

A handwritten signature in black ink, appearing to read 'Rebecca Greenland', written in a cursive style.

Rebecca Greenland
Principal Solicitor