

15 December 2022

Nicole Brewer
Director - Energy Assessments
Development Assessment
Department of Planning and Environment
Locked Bag 5022
Parramatta NSW 2124

Dear Madam

State Significant Development Application SSD-21208499
Glanmire Solar Farm
Site: 4823 Great Western Highway, Glanmire (Lot 141 in DP 1144786)

I am a Director of Fitzsummer Pty Ltd and reside part-time at the premises on Lot 1 in DP 839259 at 4887 Great Western Highway (**Land**), which adjoins the Site.

I make the following submission in objection to the State Significant Development Application SSD-21208499 (**Application**), by which Elgin Energy Pty Ltd (**Elgin Energy**) seeks consent to develop a 60 MW solar farm with a 60 MW / 60 MWh battery energy storage system and associated infrastructure (**Development**).

Near Neighbour Consultation

I signed a petition prepared by the Glanmire Action Group approximately 18 months ago, following an initial consultation with representatives of Elgin Energy.

I refer to pages 72 and 73 of the Environmental Impact Statement – Glanmire Solar Farm, dated November 2022 (**EIS**) prepared NGH Pty Ltd (**NGH**), which provide an overview of the near neighbour consultation undertaken by NGH.

Whilst I did receive correspondence from NGH and allowed a visual consultant access to my property so a visual impact assessment could be undertaken, I was not provided with copies of any draft assessments, plans or other materials forming part of the EIS until immediately prior to the EIS being notified.

Accordingly, I have had limited time to consider and make an informed submission on the EIS.

Objection to the Environmental Impact Statement

I wish to object to the setbacks for the Asset Protection Zone as proposed by the Application.

The EIS (p279) states that:

In accordance with Section 8.3.5 of PBP, an APZ of a minimum width of 10m would be provided around the solar farm buildings, substation and BESS, and around the

outside perimeter of the solar array. The 10m APZ set back requirement would also be applied to any woody vegetation plantings undertaken around the perimeter of the solar farm. All the APZs would be managed as an Inner Protection Area, to the specifications of Appendix 4 of PBP.

The APZ surrounding the proposed BESS unit and substation would include gravel surfacing to minimise the risk of fire escaping from the facilities and the risk of external fire affecting the facilities. The vegetation and bushfire mapping do not suggest that an APZ greater than 10m would be required.

The proposed 10m setback around the solar farm buildings are inadequate and will not provide a sufficient buffer for fire events emanating on the Site or sweeping across the Site.

To mitigate against the risks of fire, as a minimum, a 30m setback is required to ensure that all mitigation occurs on the Site, and the development or use of my Land is not prejudiced by the solar farm.

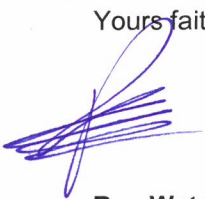
My Land will be used for cropping activities.

I have received advice from an insurance broker that my insurance premiums will likely increase significantly in the event that a solar farm is developed on the Site. I have also received advice that a liability policy may impose conditions, for example when undertaking 'hot works'.

This position is consistent with the *Large-Scale Solar Energy Guideline* (August 2022), which states (pg35) that:

Where a solar energy project is located adjacent to a horticultural or cropping activity, the solar array should be setback from the property boundary by at least 30m to mitigate any heat island effect.

Yours faithfully



Ray Waterhouse