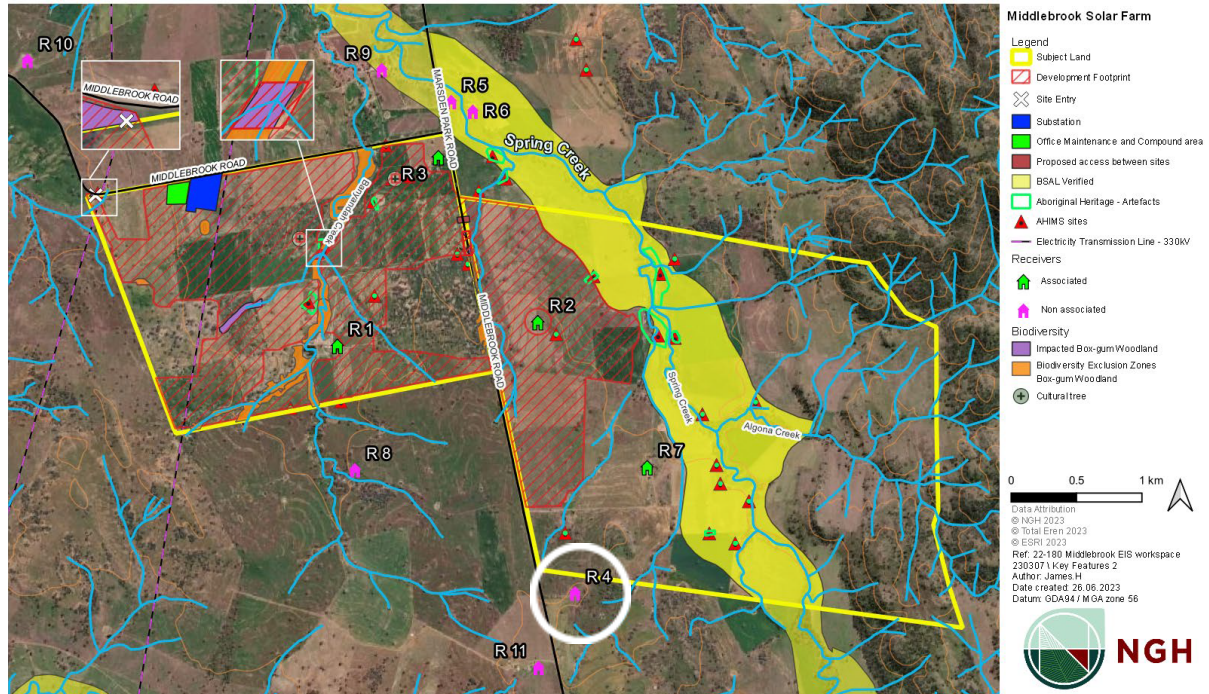


Our Objection to Middlebrook Solar Farm

We are Receptor 4 on their maps. Only 660m away from the panels, in direct line of sight, Our property is in the white circle. The only access to our home from town/workplace is driving past this proposed solar farm.



Location:

Loomberah is a beautiful highly sought-after rural farming location on the south side of Tamworth, NSW. It holds a rich farming history and the locals are passionate about our area, livelihood and the lifestyle that we can provide for our children for generations to come. The proposed location of the Middlebrook Solar Farm lies outside the New England Renewable Energy Zone and is surrounded by valuable and productive livestock farming properties.

The proponent has chosen this location due to the 330kw lines running through one of the properties to be used for the solar panels.

Because this proposed project is OUTSIDE the New England Renewable Energy Zone or any renewable energy zone, it should not be given approval. These REZs have been selected by the government to allow for significant community benefit due to land resources being used for renewable energy projects. The Loomberah region does not have any community benefit agreement with the government or Total Eren.

The location of this project is NOT in the right location. The decision for the location of this project is lazy. We would like to know where were the alternate sites for this project, as the alternative sites were not disclosed or outlined in the EIS.

Visual Impact:

Every single person who comes to our home states 'Wow!, what a view'. Total Eren completed a Visual Impact Assessment as per requirements. Somehow our view from our property is classed as 'low scenic quality', the visual impact on our property has been categorized as moderate, but because of the undulating topography of our land, the end

result was that the Total Visual Impact was low. This is insulting and quite frankly, we believe is incorrect. We would also like to note that the photo montages from our property that are looking directly at the project were NOT included in the visual impact assessment by Total Eren, nor were they a correct representation of the visual impact we face. We feel that because these photos are not correct, it resulted in categorising the visual impact from our property as false. We are requesting an Independent Visual Impact to be completed. Please see the photos in the attachments of our beautiful view from our home and the photo montages that Total Eren have supplied to us but not included in their Visual Impact Assessment.

Water usage in Rural Areas:

Tamworth has had water storage increases in the past few years but with the last drought, the levels of Chaffey Dam were getting very very low, despite the community being put on extreme water savings restrictions. The EIS proposes that they will need to use Tamworth's supply of water for dust suppression over the 3 different properties, that the project spans over. They have estimated that they will need to use 100ML per year for dust suppression during the construction phase. We believe that the amount that they have estimated is not sufficient for the project. During the next drought, (which from recent weather history, will most likely be during the construction phase) what are the other alternatives for sourcing water for dust suppression?

Road:

We live on an unsealed road that is of poor quality and requires regular trips to the local tyre shop due to the high volume of shale rock within the area, that punctures our tyres. The road also requires regular maintenance from the local council but only occurs approx every 12-18 months. The current road is not wide enough to safely pass wide loads or 2 x B-double trucks which will be a huge part of the construction phase. Rain plays a huge part in the destruction of the road, with increased movement on the road it will become very unsafe with potholes and ruts caused by trucks. The section of the road that will be used from the New England Highway to the entrance of the project NEEDS to be sealed. There is 1x neighbour in close proximity to the project, and their house is only 100m off the unsealed road, on a large bend, the huge increase in traffic will have detrimental effects on the living conditions at their home and on their Bed and Breakfast business they run on the property also.

We also have concerns for the structural integrity of the small bridge on Middlebrook Road, which gives us access over Goonoo Goonoo Creek just off the New England Highway, with the huge increase in traffic for our normally very quiet road, the B-Doubles, and Wideload Vehicles accessing the road and bridge to access the site, we have concerns that the structure of the bridge will be damaged. During flooding, this is the only time-efficient way into town, as access along Duri-Dungowan Road is cut off by floodwaters from both directions.

We also have concerns about the construction phase of the New 330KW powerlines that have been earmarked only 10kms south of our property, what happens to the residents in the middle of both projects on Middlebrook Road if there is an emergency? With both ends of our unsealed road being used to transport huge infrastructure at both ends of our road. New England Highway often has severe road accidents, which cause lengthy delays on the highway in both directions, what happens if there is an accident and the workforce decides

to use alternate routes to access the Middlebrook Solar Farm? These routes would be the South end of Middlebrook Road off Garoo Road and Lindsay Gap Road, and Marsden Park Road off Duri-Dungowan Road from the north. Will there be strict guidelines for staff to follow protocol and only use the Middlebrook Road entrance off New England Highway? How are they going to enforce this?

Traffic:

We have a beautifully quiet rural unsealed road. Normally only around 15-20 vehicles per day use the road, mostly residents, and local suppliers/tradies accessing the road if needed. There are B-Double Cattle trucks that access this road to neighbouring properties, sometimes up to 3-5 per day, but these are few and far between. We have concerns about the proposed increase in traffic volume of 166 vehicles minimum per day. That's a 730% increase on our normally quiet road. This will affect the safety and lifestyle of surrounding residents as residents ride horses along the road, and move cattle along the road to be able to move them between paddocks, in times of drought we rely on being able to graze our livestock along the road so the stock has access to food. All this will not be safe or even achievable if this project is approved.

Middlebrook Road is also a school bus route, which will put the safety of the children in the area at major risk with an extra 166 minimum vehicles per day putting increased pressure on the bus driver to make sure every child he picks up and drops off is out of harm's way.

The Traffic assessment states that the number of vehicles will drop from 166 per day/35 per hour to 82 per day/19 per hour. 19 Vehicles are more than what normally goes along Middlebrook Road in a DAY, not per hour.

The EIS states that the 400-strong construction personnel, which they are hoping to source a large number of those from Tamworth. The EIS states that they will be doing bus transfers to minimise traffic volumes. As a local to this area, and married to a tradesman, I know that they do NOT go anywhere without their own vehicle/ute, because of the tools and equipment that they carry everywhere. So this will dramatically increase the number of vehicles accessing the road and site and the dust that these vehicles produce.

The Middlebrook Road entrance from the New England Highway is not safe for the amount of traffic that is planned for this project. Coming from Tamworth (North) there is no left-hand turning lane, with traffic coming down a slope, vehicles currently have to move outside the road markings, to then swing tightly onto Middlebrook Road. Currently, with large trucks coming up the rear, this can be an unnerving and dangerous turn onto Middlebrook Road, especially when travelling with a trailer/horse float. With the amount of forecasted traffic, this intersection will need to be upgraded significantly to make it safe for residents, the project workforce and other travellers on the road that are travelling north or southbound.

We also believe that Marsden Park Road will be used extensively by any workforce that is coming from the north or east sides of Tamworth or coming from the Armidale side of Tamworth, it is the easiest, quickest and most direct route for tradespeople and subcontractors to the project. How will Total Eren enforce that all vehicles come down the New England Highway and then onto Middlebrook Road? What penalties will there be for contractors/deliveries that come down Marsden Park Road? The increase in traffic on this road will also very quickly degrade our unsealed road. Total Eren needs to agree to seal both ends of these roads.

My family frequently use these roads on foot, walking our dogs, riding our bikes and riding our horses along the road. The increase in traffic will be dangerous for my horses and dogs and most importantly my children. All residents that live along Marsden Park Road or Middlebrook Road are fully aware of slowing down while approaching children or horses on the road, it is courteous, kind, reduces the dust, and of course, is safe. Subcontractors and staff of Middlebrook Solar Farm would not be aware of this. What happens if one of their staff drives past too quickly, causing my child's horse to spook and then they fall off?

Total Eren needs to drastically review the traffic impact assessment and update it accordingly.

Noise:

We are blessed to live in such a quiet rural environment, with the occasional cattle truck, tractor and cars travelling along our road. The increase in traffic around the project will be substantial. The RBL given to our property was 35 dB with a management level of +10dB during construction times. This will have a significant impact on us as the R4 receiver as we are in extremely close proximity to the project with a large number of equipment to be used, this will exceed the sound management level as outlined in the EIS.

Equipment such as Impact Pile Driver 126 dB, Dump Truck 115dB, 35t Excavator 114dB, Grader 116dB, Front End Loader 111dB and Bulldozer 118dB, will well and truly exceed the levels outlined in the EIS. This will become disruptive to our quiet and peaceful rural setting. Liz is a shift worker and works in the local emergency department as a nurse, the noise that this project will produce will have an impact on the quality and amount of sleep that I am able to get. After night shifts, it is so quiet at our home that there is no need for earplugs. How is Total Eren going to manage this disruption to sleep? Reduced sleep will result in an increase in fatigue and which can ultimately lead to mistakes at work, especially when dealing with people's lives. Josh has over 15 years of experience on major construction sites and knows that the levels of sound that are forecast will not be able to be adhered to as the sound carries much further being in a valley, this will certainly breach the acceptable levels outlined in the EIS. More so, People living in the cities (and likely the ones who have completed the noise assessment) are accustomed to increased sound and noise levels. We have been living here, in our quiet, peaceful environment for 9 years and do not want this to change. The work hours of 7 am - 6 pm, and the constant noise of different machinery and drilling holes for the Solar panels will be extensive, even if these work hours are industry standard, this is not ok in this instance. The peak construction period is extensive, lasting a minimum of 18 months. This is not an industrial area, this is our home, our lifestyle, our serenity, where we don't have to listen to the noise that will be forced upon us and quite frankly be noise pollution.

Workforce:

As per the EIS, they are estimating a workforce of 400 personnel during the construction phase - where is this workforce coming from? With multiple large projects planned for Tamworth, currently, there is and will not be this type of local workforce available, to complete the project in the timeframe they have advised. This will then further extend the construction period of this project and increase all aspects that we are objecting to.

If they are upskilling local people to complete the project per the EIS, what does this entail? What skills and/or qualifications will they have at the end?

Health infrastructure:

Our local healthcare system is failing with the current population of Tamworth. Tamworth Rural Referral Hospital is the closest referral hospital for many of the outlying hospitals and towns up to 3 hours away within the New England and Northwest region of NSW. If Total Eren is bringing in a supplementary workforce from elsewhere (because there is not 400 workforce personnel in Tamworth), this increases the population of Tamworth. Currently, there are only a few local GPs practices that are actually taking on new patients. With the demand on local GPs and unable to get into your local doctor for sometimes up to 12 weeks, the rest of the community is forced to attend the local emergency department, therefore increasing the demand on the public hospital system, especially the local Emergency Department, which is already at capacity on a daily basis. Is Total Eren going to have its own private nurse or medical team onsite during the construction phase to ease the pressure on the local healthcare system?

Housing:

Where are they going to house the workforce? Tamworth has a rental vacancy rate of 0.6% as of September 2022. Local builders are at capacity constructing new houses. If Total Eren are bringing in an additional workforce from other towns to complete the construction phase of the project, then this will further drive up the costs of housing, especially the rentals. This then puts further pressure on locals struggling with the current increase in living costs and is unfair to those that are struggling to find affordable accommodation.

Fire:

Firefighting equipment for onsite, what will they have? Where will they get the water from to fight a fire? And is this only in place during construction?

Within the EIS, they have written about 2 different amounts of water that will be used for firefighting purposes, 20,000L and 50,000L, which is it? 20,000L is not sufficient to fight a large-scale fire in a rural area. We have no fire hydrants anywhere near the area, the closest would be 20mins away. Then they would be relying on water taken from stock dams either on the properties where the solar panels are located or relying on neighbouring properties and their water supply. What happens in drought, when there is no water at all in the dams? Where are they getting the water from then?

The requirement for a 1000L water cart as per their report is a ridiculously small amount of water to fight a fire in a rural area. The closest RFS and Fire and Rescue being minimum 20mins away, the extent of damage to land, assets and more importantly releasing toxic chemicals from the panels burning would be substantial.

Community Benefit Fund:

In the EIS they state that it will be a community-run fund, Who will run this fund? Have they approached anyone to run this community benefit fund? How much money will the fund be receiving each year? Total Eren needs to be upfront in the amount that they will be providing for this fund per year.

Voluntary Neighbouring Benefit Fund:

The money that was offered as a close neighbour and clearly visually impacted neighbour was shockingly low. The proponent offered \$4000 per year (indexed) over the 30-year period. This amount, even over a 30-year period would not even come close to the loss in value of our small lifestyle block. If this project goes ahead, they need to drastically increase this amount for all neighbours that are within 3 km of the project and for those neighbours that are visually impacted (no matter the distance from the project).

Mental Health:

The project has had an enormous impact on the mental health of both of us. Dealing with everyday life issues these days is hard enough with kids, work and added hardships caused by inflation and interest rates rising. Given the position of our home, we are fortunate to be able to come home and sit on our deck and look out over the valley, this gives us a sense of satisfaction and accomplishment, which keeps us in a positive mindset. If this project goes ahead this will be taken away from us as we will be looking at thousands upon thousands of solar panels. The stress that this project has already caused is significant, we should be putting our time and energy into our young children, instead, we are sitting in front of the computer reading over this extensive EIS and finding elements that are incorrect or have not been considered. Increased stress, causes all sorts of flow-on effects, stress on our marriage, reduced sleep, and reduced performance at work. We are desperately trying to protect our way of life, not only for us but for our two young boys, for whom we have worked so hard to provide this lifestyle. We have tried to protect them from this project and angst between ourselves and our neighbours who will be having the panels on their property, but even at 4 and 6yrs old they are realising that something is not right and their mum and dad are fighting hard to protect their small farm, stating regularly now 'oh is that to do with the solar farm?'

These projects are detrimental to small communities, pitting neighbour against neighbour and breaking down relationships that were once great.

Loss of Land Value:

We have had several local real estate agents view our property recently, again, all of them stated when they first arrived 'Wow, what a view'. All of the agents have stated that there will be a significant loss in value on our small lifestyle property. We are a small lifestyle block that, unlike the other much larger properties around this area, we are NOT an income-producing farm. Other properties, despite a large solar farm, will still be able to produce, beef, lamb and crops for production and income. We do not have the capability for this. Selling our property with the proposed Middlebrook Solar Farm will have detrimental effects on its value and we will never be able to sell it at anywhere near market price. We have put a huge amount of capital into our property to make it a beautiful home and farm to live with our small children.

Emergencies:

As a small rural community, there is only one road in and out, if there is an emergency that could happen at any time to anyone living on our road, we have concerns that with the increased traffic and upgrades of the road and entrances to the site, this will adversely affect the time to get medical attention or getting an ambulance into the area. If there is a road

closure during the construction phase due to digging trenches for example, for underground cabling between the 3 different properties which run across the public road, the only way to medical facilities is by driving south which is in the opposite direction to our closest hospital which will add a minimum of 45 minutes to what is already critical time, which then could mean the difference between life or death.

Biodiversity, Habitats and Endangered Species:

Given the size of the project, there will be a large number of well-established trees that will be to be cleared, which will result in the destruction of the habitats of so many species. I would like to point out that the report on these species was conducted in 2020 during the extensive drought that we have only just come out of, at the time, the landscape was bare and animals moved to areas of higher growth and food availability at the time. There is evidence of koalas and there is bluegrass in the area, both of which are on the endangered species list.

The EIS states that they will be clearing 194 scattered trees, where will they replant these trees to offset the removal? If so, where? To the layperson, figuring out the offset requirements is incredibly difficult.

As per the EIS 'No evidence of Koala was not observed during targeted and incidental surveys across May, August, October, and November 2020' this time was during an extensive drought.

Now that we are not in severe drought, I request that these surveys are completed again and give an updated account of the species in the area.

Where are the Panels made:

Where are the panels developed and produced? What is Total Eren's Supply chain? As per the NSW New Modern Slavery Act. For all businesses operating within NSW and earning over \$100 Million, they need to report and disclose that the supply chains they are using are not using modern slavery methods to obtain materials to produce their products

As per a report by the Clean Energy Council

'Australia's clean energy transition is accelerating and is an essential element in the country's decarbonisation. However, growing evidence linking some renewable energy supply chains to modern slavery shows that the clean energy industry, together with governments and other stakeholders, must pursue strategies to help eliminate modern slavery in mineral extraction and manufacturing.'

The report cited detailed allegations of forced labour and slavery in supply chains for solar and wind energy and battery storage. Examples included that:

- 1. About 2.6 million Uyghur and Kazakh people have been subjected to coercion, "re-education programs" and internment in the Xinjiang region of north-west China, which is the source of 40-45% of the world's solar-grade polysilicon. A report by the United Nations Office of the high commissioner for human rights three months ago found Xinjiang was home to "serious human rights violations", and the US has listed*

polysilicon from China as a material likely to have been produced by child or forced labour.

2. *On batteries, there were major issues with the mining of between 15% and 30% of the world's cobalt in the Democratic Republic of the Congo. Amnesty International found that children, some as young as seven, were working in artisanal cobalt mines, often for less than \$2 a day. Mining conditions were reportedly hazardous, and workers often did not have adequate protective equipment and were exposed to toxic dust that contributed to hard metal lung disease.*

Could Total Eren please supply a certificate of origin for their panels and batteries?

Security Fencing and Camera's:

I am slightly perplexed by the need for a 2.4m high-security fence with barbed wire on top in a rural area. Why is there a need for such an enormous industrialised fence? If this is to go around the entire project, the look and feel of our beautiful community will be ruined. Why would anyone ever want to live in this area? Also regarding the fencing, I am concerned about the impact this will have on native birds and other wildlife within the area. How many birds die because they fly right into them at speed or get caught up in the barbed wire in these types of fences?

We have significant concerns about the security cameras for this project. Do they face the road at all, or does their angle take in the public roads? I absolutely do not consent to myself or my family being filmed while walking/riding bikes or horses while accessing Middlebrook Road.

Final Words

In final, as you can appreciate, we love our rural community and the beautiful landscape that it provides for us. We don't want to live with neighbours right next door, we don't want to live near train tracks or major highways, nor do we want to live in the city as many people do. We worked hard to find an amazing, quiet, peaceful home 9 yrs ago and would have never bought our property knowing that a Solar Farm would potentially be given approval in destroying our lifestyle, views and value of our small property. We implore the NSW government to reject this application of the Middlebrook Solar Farm for all of the above reasons.