

**This submission against the Bendemeer Solar Farm has been prepared and submitted for and on behalf of the Save Our Scenery Bendemeer Action Group.**

***Save our Scenery Bendemeer Action Group (SOS) represents some of the most negatively impacted Bendemeer residents by the proposed large scale industrial solar development on the scenic hills of beautiful Bendemeer.***

## Landscape and Visual Impact Assessment

### Executive Summary

#### Paragraph 3

Bendemeer Energy Hub (Athena/Metis Energy) has advertised to the Bendemeer community via their web site etc, that the solar farm will cover an area of up to 350.8 hectares, disturbance footprint 476.6 hectares – how is it that the EIS advises total project area will be 606.4 hectares and increase of almost double the advertised area to be covered in industrial infrastructure?

The solar farm will cover an area of up to 350.8 hectares, and there will be approximately 430,000 solar modules created for the project. The solar panel technology will be monocrystalline silicon, and will use up to 5,000 single-axis mounting technology trackers. With a project nameplate (DC) rating of 280 MW, the total disturbance footprint will span across up to 476.6 hectares (1,177 acres).

#### Paragraph 7

The Scenic Quality Rating of the LCZ has been described as low to moderate. The Bendemeer scenic quality as appreciated by those who live here or are advertising the area to sell a property or for tourism would emphatically disagree with that rating. The “expert” assessment is not correct regardless of the basis behind it and should not be accepted as fact by the NSW Planning Department/Planning Minister as it is not. Consideration, social licence, should be giving consideration to all the families who call beautiful Bendemeer home. The proponent’s own web site is just one of a few of the thousands of similar examples from the web been provided below for your consideration:

Bendemeer Energy Hub web site:

The Bendemeer Renewable Energy Hub is a sustainable project comprising of a 280MW DC solar field and 360MW wind farm, co-located in the beautiful community of Bendemeer, in the New England region of New South Wales.

Domain real estate:

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## Property Description

### 5 Bedroom Home on a beautiful 100 Acre Lifestyle Block

Located only 30 minutes from Tamworth and 5 minutes to beautiful Bendemeer,

Destination Tamworth web site:

Situated in scenic Bendemeer overlooking the MacDonald River, the Bendemeer Hotel offers cozy country accommodation in beautiful surroundings.

The pretty township is located just 30 minutes from Tamworth and ten minutes from the top of the Moonbi Pass. located near the crossroads of the New England and Oxley Highways, Bendemeer Hotel is the perfect rest or overnight stop for the weary Traveller.

With its many comfortable rooms and excellent dining facilities, the Bendemeer Hotel is also the perfect spot to stay and relax for a few days for those looking to discover the treasures of the beautiful New England region.

#### Paragraph 11

This project area cannot be constructed with minimal impact on the existing landscape character or upon its defining features. 430,000 black solar panels and associated industrial infrastructure spread over a massive 1498.447 acres (606.4 hectares), sited almost at the boundary of the village will have a huge impact on the existing landscape character and this project will not be described as beautiful.

#### Column 3, Paragraph 4

##### Cumulative Impact

There is an unquestionable cumulative impact for Bendemeer as this project will be highly visible from many locations especially Bendemeer village itself and some severely impacted landholders who reside with their families beside this proposed major industrial development.

Bendemeer is impacted severely by the Thunderbolt wind project to the north, Bendemeer wind project north, south and east of the village and current location maps showing the expected 250m high turbines (Crown Sydney Barangaroo 271m) within 4-5kms of Bendemeer, closer to many family farms some of 7 generations. Walcha located on the Oxley Highway (same as this solar project) is expecting a few massive wind projects Winterbourne and Ruby Hills, nearby Woolbrook wind and solar, Brackendale wind and solar, Salisbury wind and solar, New England solar, Uralla solar, Metz solar, Stringybark solar, Tia wind, Doughboy wind, Olive Grove solar, Oxley Solar, Sundown Solar and there are even more.

The only road in and out is the New England Highway and the Oxley Highway – Bendemeer village will be impacted by every project as it sits at the junction of these highways. This is an unfair burden for our small community which will be forever changed and not for the better. Our beautiful landscape and Macdonald River is what makes us an attraction, the few benefits to the few will not make up for what the Bendemeer solar and wind projects alone will take from this area for the foreseeable future.

#### Column 3, Paragraph 6

We do not agree with the conclusion made that the impacts of such a massive industrial project on Bendemeer's doorstep will have a low impact. We do not agree that the impact on the 26 receptors is low. If the Bendemeer community believe wholeheartedly that their landscape, their environment in and around Bendemeer is beautiful, enjoy the entirety of their rural properties with views in all directions including those who reside on residential properties who derive endless enjoyment in sitting on their verandah and looking East as most homes face in Bendemeer, it is not possible that the visual impact will be low. You do not have social licence for this development which will take from the community, a high percentage who are retirees, be they poor or otherwise, part of their lifestyle, their beautiful view which is irreplaceable.

#### Introduction

Moir Landscape Architecture state they have prepared this EIS and that their Professional Assessment Skills and their recent experience relate to:

- Blind Creek Solar – web site states it is suitable for a solar project as land is flat and treeless
- Glenellen Solar Farm – web sites states primarily flat land clear of trees
- Oxley Solar Farm – web site shows flat primarily cleared land
- Stubbo Solar Farm – web site states project is on flat cleared grazing land

Not one of the above projects above that is an example of their recent experience is located on land that is even close to resembling that of Bendemeer, which sits in the Moonbi Ranges and straddles the Macdonald River.

### 1.3 Overview of Study Method

#### Visual Impact Assessment

The impact of this massive solar project on the Bendemeer landscape and therefore the views enjoyed by Bendemeer's inhabitants cannot possibly be understood by a landscape architecture firm that could not place the same value on this area in the first instance as presumably they do not reside here, presumably have not invested time and money into a property here and appear to have little if any experience in determining a view's value in an area such as Bendemeer. Every project listed as recent experience by Moir is flat, cleared land, which also makes it crystal clear that the Bendemeer range area is not a suitable placement for a solar project. It is doubted that Moir will be obtaining experience in another area in a similar environment because it appears widely accepted, expect in the Bendemeer Solar project case, that such projects are suited to flat cleared land.

### 2.0 Project Overview

Cover page – shows a picture of a solar project on cleared flat land – this is prime example of the visual impact of such a project, which is large and how it degrades a view.

#### 2.1 Project Area Locality

The project is not is described as being 1.8kms from Bendemeer (Hotel), this misrepresents how close this massive project is to the village given the village continues to the East side of the New England Highway with the Bendemeer Energy Hub (BEH) web site advising 11 homes within 1km – this should be unacceptable with regard to a residential village and a major industrial complex.

**It should be noted by the applicant has it has not been identified in this EIS that there is an in use airstrip less than 5kms from the project site located on "Vermont" Airlie Stock Route Rd, Bendemeer.**

#### 2.2 The Project

15 full time staff always advertised however proponent cannot provide specific information on those jobs. Have found 10-15 ongoing staff a common claim in various solar projects. Calls to various solar projects do not support this claim when similar in operational size if not larger with some fully remote controlled. For example Oxley Solar Farm with close to same amount of panels ie similar in operational size claims 5 full time staff. A search of SEEK for solar farm operators returned information showing solar farm staff require electrical or engineering trades for such roles – only one labourer position located. How will positions requiring those with electrical trades and engineering trades suit unemployed currently residing in Bendemeer as do not know of such skilled personnel residing in this locale but seeking employment? It is therefore expected based on this information obtained that the project will do little if anything to help anyone unemployed in Bendemeer and instead may result in persons currently residing elsewhere to secure these jobs.

The recent Northwest Regional Careers Expo in Tamworth (40kms from Bendemeer) was held in May 2023. Bendemeer Energy Hub or any organisation related to them were exhibitors at this expo (<https://nwrce.org.au/exhibitors/>). Why was this organisation not in attendance given their repeated claims of hundreds of jobs with construction of projects and ongoing? In actual fact there was only one solar organisation that was listed as an exhibitor and their promo did not contain any information regarding jobs in the industry.

#### 2.3 The Solar (PV) Array

PV module height 4.2m. This is a massive height. Is this when they are turned to follow the sun or is this their resting height? Either way, this would ensure the project is far more visible than if sited close to the ground.

PV modules consist of various chemicals etc., silicon, doped using boron, phosphorous, cadmium, telluride, copper, indium selenide and amorphous silicon – how hazardous are each of this materials? This project is parallel to the Macdonald River the drinking water for Bendemeer village.

### 3.0 Landscape Character Assessment

#### Figure 5: The Project

The Disturbance Boundary shows the project at the centre of the picture and the majority of homes where Bendemeer people reside within the 2.5km area. This however misrepresents the closeness of this major project to the village and should be unacceptable. This picture tells a very different story to the one explained in the supporting data. In using the key depicting kms the village is clearly sitting at just over 1km only from the project – this is absolutely unacceptable. We are a village of people every one as important as those who reside in large communities.

#### 3.2

Has the LCA been done only from 5km because it suits the case for the project and not the occupants of the village and surrounding area? The landscape character of Bendemeer includes that of the village itself and the surrounding landscape with its mountains, hills, valleys, rivers and creeks.

### 4.0 Community Consultation

If applicant engagement with the community and affected landholders is important to the siting of the Bendemeer solar project the applicant is not listening. The project is too close to the village, our water source and will destroy our surrounding environment and views.

The community consultation was possibly somewhat effective if a representative went door to door. Long after this commenced many in the village were and still are unaware of the project. Internet and Facebook are not large in Bendemeer – the last CENSUS showed a low level of internet connection in Bendemeer close to only 60%. Bendemeer has a high retiree population.

The applicant/proponent paying money to some organisations in the community like the campdraft has torn the community apart. Whilst some may accept this funding others oppose the project and therefore, as with everyone other township affected by such issues, friendships are terminated and the attempt to divide and conquer has an affect albeit a very distasteful one. This must indicate that the project does not have social licence.

### 5.0 Baseline Investigations

#### 5.2 Physical Influences

If project sited in the Bendemeer area where hills range from 600-1500ms, how is it not highly visible when project sits at just under 1000ms?

Save Our Scenery Bendemeer Action Group have investigated widely and has yet have not located a solar project to be or already sited in hilly terrain such as here in the Moonbi Ranges. All research found the best place to site a solar project and especially one of such an enormous size was on already cleared flat land – the proposed site at Bendemeer is almost the opposite of the many recommendations available on line.

Erosion – claims that the land the solar is to be sited on is prone to erosion does not support the project, which amongst other things will be pile driving 430,000 PVA panel supports into this earth. Bendemeer is a high rainfall area – approx 35 inches/year and over the last three years it has been substantial. How will this not affect the surrounding streams and the Macdonald River into which they all drain? Macdonald River is not just for recreation it is the drinking water supply for Bendemeer.

#### 5.3 Ecological Characteristics

Why no mention of the Bendemeer Snow Gum that is found only in Bendemeer?

#### Image 4

We dispute that this picture is “typical” of the Bendemeer landscape – it is however still beautiful.

#### Figure 7: Key Landscape Features

Again, this picture clearly shows the unacceptable closeness of this major industrial project to the village of Bendemeer as well as the homes of the many families on small farms who will be forever impacted negatively by this industrial development.

## 5.6 Landscape Condition

Unacceptable that the various streams that enter the Macdonald River, our town drinking water, should have this project in their midst. What mitigation works will be required to hold out any chance of chemicals etc entering the Macdonald River?

## 5.7 Land Use

Land use within Bendemeer is typically devoted to rural/residential homes, sheds and other farm infrastructure – this is why people have worked hard and purchased in this location or continue to run generational farms with an expectation that the area would not change ever to the extent that it would contain a major industrial solar operation spanning almost 1500 acres and then be expected to also accommodate 250m high wind monoliths and associated infrastructure. It is a burden too great to be placed on so many hard working families that will not bring them prosperity but misery and devalue their homes and properties.

Yes, the Oxley and New England Highways that Bendemeer sits at the junction of are important transport routes, who much so that the further impost of these major developments will impact Bendemeer more so than most and this is most unfair and should not have social licence.

Figure 8: Land Use – Note again closeness of this major project to an occupied village.

Figure 9: LEP Zoning – Note again this project sits on top of the Bendemeer village.

## 5.9 Large Scale Energy Development in the area

### Table 3

Bendemeer Wind Farm just over 4km to Bendemeer village as per makes obtained from Bendemeer Energy Hub – towers 250m high (Crown Sydney Barangaroo 271m high).

What proof is there to support the statement that such structures are not visible from 8km?

The occurrence of large-scale renewable energy projects within a region does have the potential to alter the perception of the overall landscape character – this is not acceptable. This will impact our futures, our quiet enjoyment of our properties, our homes and impact our livelihoods and property prices. Home style magazines do not showcase solar and wind installations in their beautiful homes and rural property sections. If such developments enhanced lives, views and property prices we would not be spending our time writing this submission against this solar project.

The cumulative impacts of so many large-scale projects in such a concentrated area will destroy the very environment supposed be being saved and many of our happy relaxed country lifestyles with it.

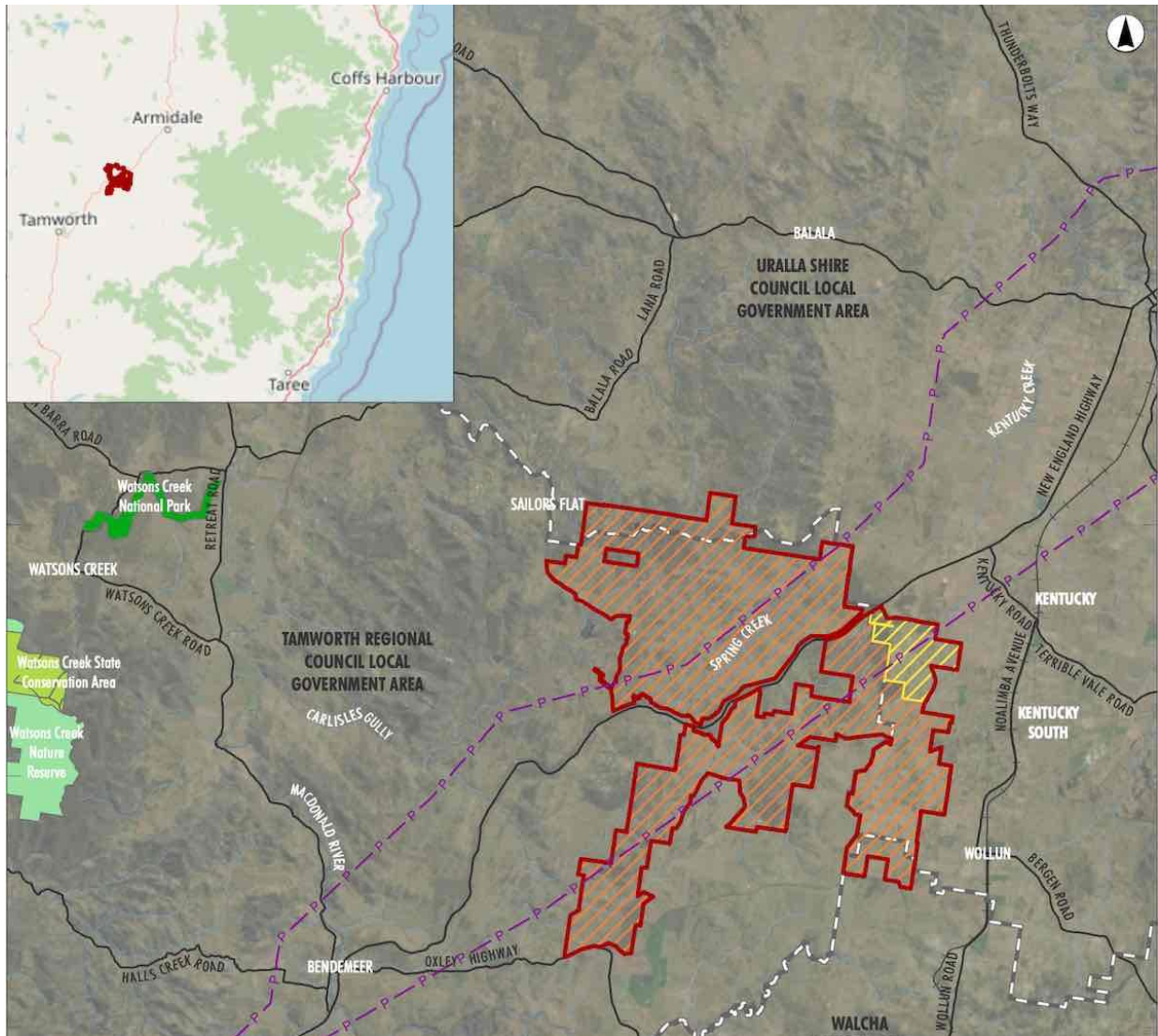
### Table 3: Overview of nearby large-scale renewable energy projects

The table shows the distance to Bendemeer however, the table does NOT show the distance of each of these projects to their respective village/town. For your information please note the following and explain how it is acceptable that the Bendemeer Solar project can possibly be acceptable given its location to the village? **Bendemeer in comparison is just over ONE KILOMETRE from the project.**

- Salisbury solar - 10km from Uralla
- New England Solar – 6kms from Uralla
- Middlebrook Solar – 22kms from Tamworth
- Tamworth Solar – 25kms from Tamworth
- Oxley Solar – 12kms from Armidale
- Tilbuster Solar – 6kms from Tilbuster
- Metz Solar – 15kms from Armidale
- Orange Grove Solar – 12kms from Gunnedah
- Gunnedah Solar – is Orange Grove Solar????

Investigations into your information reveal the Orange Grove Solar and the Gunnedah Solar are one and the same.

Map below shows the location of the massive Thunderbolt wind farm on Bendemeer's doorstep.



## 6.0 Landscape Character Zones

### 6.3 Determining Scenic Quality

Community values have not been taken into consideration when the landscape values are rated low to moderate. You do not have social licence in determining that Bendemeer and surrounding landscape are of low or moderate rating this is not correct and does in no way show respect for or appreciation of the Bendemeer community and what the community values.

Figure 12: Land Character Zones

We dispute the non-associated dwellings as shown on this map – those on the West of the town will have views to the East and the location of the project.

### 6.4 Overview of Landscape Character Zone

We dispute entirely the overall scenic quality of our area is moderate. This report shows no social licence or understanding or appreciation of the community on which you want to impose a large scale industrial project that will benefit a chosen few at the expense of the majority who will be impacted negatively.

#### Alluvial Plains

We dispute that the scenic quality of this area should be rated moderate. The value is attributed to an area by the people who live there and love it most as we do. This is an insult and does not show social licence with the Bendemeer community.

#### Partially Vegetated Hills

The overall scenic quality of this LCZ is rated low – we absolutely disagree with your conclusion. It is an insult to the people of Bendemeer who value their environment.

#### New England Highway Pastures

The overall scenic quality of these areas is not low and we again dispute this disrespectful and inaccurate rating.

#### Oxley Highway Pastures

Image 16 and 17 – where exactly were these pictures taken – what location please?

#### Towns and Settlements

Views within these towns area generally contained by the surrounding hills and undulations – how then is it that the area to be studied is 5km surrounding only? Bendemeer is of its surroundings and because of its surroundings.

The Macdonald River is a defining character – yet the project is sited along side this beautiful river – how can this in anyway be justified?

The scenic quality of our village is rated as moderate – we disagree entirely and advise a quick Google search will reveal the village is repeatedly described by visitors, locals etc as beautiful, enchanting, lovely, pretty – not one search returned the description of our village as moderate.

#### 6.5 Summary of Landscape Character Assessment

It is not correct to assume the landscape character impact will be low – this is incorrect.

#### 7.0 Visual Impact Assessment

##### 7.2 Assessment of Associated Infrastructure

###### 7.2.1 BESS

The BESS was always advised as being 20,000sqm – this EIS has revealed the BESS will be 32,369.5sqm – this has taken the BESS from approx 5acres to almost 8acres and it is expected to be even more visible than previously advised. This is a massive item prone to fires located precariously close family homes and our village this is an unacceptable risk.

###### 7.2.5 Power Conversion Units

How large are the 60 containerised inverters and are they a flammable object?

#### 8.0 Preliminary Assessment

##### Assessment Parameters

By using only the footprint the EIS has ensured this results in less viewpoints requiring assessment and does not show social licence but an attempt to prevent showing the actual impacts on Bendemeer residents. Bendemeer will definitely see the project if sited between 863 and 943 metres above sea level.

##### 8.3 Reverse Viewshed Map

Up to 91 non-associated dwelling may have views to the project – this is not acceptable to us.

##### Figure 13: Viewshed Map

Clearly shows high visibility of majority of Bendemeer residents – this is unacceptable.

Figure 14: Viewshed Map with receptors having a direct potential line of sight



This map again misrepresents the closeness of the project to the inhabitants and endeavours to downplay the negative impact on the village and surrounding properties. The project should not be at the centre of this scenario in respect of the village.

#### Figure 15: Preliminary Reverse Viewshed Map

High visibility from the majority of the village and surrounding area. How is this meant to be acceptable to our inhabitants? This project will not bring prosperity to the village allowing those who wish to leave, it will do the reverse ie drop prices and make it more difficult. If solar and wind is so beautiful why is it not featured in home style magazines? A selling point is a thing of beauty which our landscape offers – wind and solar industrial plants will not be a selling point for Bendemeer moving forward should this be imposed against our will.

#### Residential Viewpoints

Only one receptor ID shows project not visible based on viewshed mapping therefore 99% must be able to see the project with distances varying from 506m to 3,391m to the project?

This is unacceptable to the inhabitants of Bendemeer. This project is too close to the village for safety, bushfire risks but ultimately for the ruination of everyone's view no matter how small as we are not a city we are a rural community set in a small country village.

#### 9.0 Detailed Receptor Assessments

91 residential receptors have been identified for detailed assessment – has this been done?

It is unacceptable that these receptors be grouped in clusters which would not give the precise results these people deserve.

#### Table 12

All those in the clusters will see this major industrial infrastructure development. This is unacceptable, an unfair imposition on the people of Bendemeer for the ultimate benefit of others who are set to capitalise on this project. The energy will go into the grid and is not destined for Bendemeer.

#### 9.4 Stage 3 – Determine Visual Sensitivity

##### Step 2

A complex process required to determine visual sensitivity – how is this possible if not assessed by a local Bendemeer landholder and one that is not the proponent?

#### 9.8.1 Residential Viewpoints within 4km of the project area

So many dwellings that were identified for detailed assessment due to impacted views were put in clusters to make it easier for the EIS report. This is putting the interests of the proponent above and beyond the concerns of the locals and this does not show you have social licence.

#### Summary of Residential Receptors

The receptor sensitivity is moderate to high but you deem the scenic quality as low – this is incorrect and allows a disregard for the views to be impacted by this large scale development on the people of Bendemeer.

#### 9.10 Assessment of visual impact within Bendemeer

Notes that the impact on views from Bendemeer is based only on theory.

Is vegetation to screen view of project existing or presumed planted and grown in 10-20 years?

#### Figure 21 Assessment of Bendemeer Village

This map does not make sense when previous maps show same areas will have visibility of project.

Please explain how this is different to preceding maps?

#### Figure 22 Heritage Assessment based on

Appears heritage items such as Bendemeer Station will be impacted – how is this acceptable?

Suggest vegetation on Bendemeer Station has altered since this study was done.

## 10.0 Night Lighting

### 10.0 Overview of Potential Night Lighting Sources

As stated Bendemeer has little outside light we do experience a dark night sky with minimal if any at all light sources. Most are from family homes and the area is plunged into darkness each night with only a few street lights.

Bendemeer is therefore the location of the Lowe Observatory – built by Lindsay Lowe and at one time the only privately owned observatory in the southern hemisphere. This facility is still associated with astronomy and in particular the Tamworth Astronomy Club. Any extra lighting from the project is unacceptable. Bendemeer contains the small village and surrounding farms with family homes – there is no large scale industry or other development in this area. We are unique in that we experience a very dark sky and it is one of the most valuable attributes of the area. To see view the Milky Way as Bendemeer residents do is not to be taken lightly and is invaluable.

Of the few dark sky places in the world, Coonabarabran is only Australian location on this list however, Bendemeer wants to keep its special attributes as this will be of great value in an ever shrinking area of dark night skies moving forward. It will be a tourism attraction for the foreseeable future and the reason people come to the country to live and visit.

This EIS rated the Bendemeer landscape/scenery as low to moderate time and again. It would be inconceivable that this EIS if it took in the Bendemeer night sky would still provide such a low rating.



## 11.0 Glint and Glare Assessments

The project will sit along side the Oxley Highway not far from the New England. Any glare could cause an accident, which is an unfortunately regular occurrence in our area.

Bendemeer sits under the flight path of aircraft flying in and out of Tamworth and is also frequented by agricultural aircraft for spraying etc and in the recent bushfires many aerial bombers. It is therefore a risky area to place such a large scale reflective sea of black in an environment that faces severe frost and frost for most of the year from ANZAC Day until Spring or later and where it also snows on occasion.

### Environmental Impact Statement

Figure S.1

Project layout shows project is sited almost on the Bendemeer town boundary – how is this at all acceptable? The amount of trees to be removed is unacceptable and is a massive impact on the natural environment. If this vegetation has not as yet been removed during over one hundred years of grazing/agricultural practices it is highly unlikely it would ever have been.

The project sits between the Oxley Highway and the Macdonald River our town water supply in highly bush fire prone and land that is prone to erosion – this is a poor choice for such a project

### S.3 Stakeholder Engagement

The applicant has been engaged with the landholder group since 2018 during which time people unaware of such plans have purchased property in Bendemeer for its scenic beauty and quiet country lifestyle. Whilst the stakeholders will financially benefit many will be financially impacted by a large scale industrial development of no scenic quality (especially as this report deems the Bendemeer landscape primarily of low visual quality).

The Community Benefit Fund presumably will continue to advantage those who approve of this large scale development in order to gain funding for projects, whilst having no regard for those who disagree with the complete upheaval of the community with division deeply sown by stakeholders offering funding to certain groups who accept this regardless of the impact on the majority who will not benefit. The CBF is to provide meaningful community development and/or other neighbourhood-level initiatives with strong community support – the project does not have strong community support, how will strong community support be measured for even further development in a community now deeply divided due to this inappropriate large scale industrial project being built almost on top of our quiet rural village? What other development is possible given the close proximity to the village boundary?

**The Community Benefit Fund should be just that, a benefit to the community!**

**Funding of particular groups is how the community has become divided as those on the receiving end are seen to be for the project whilst those opposed do not receive. This tactic divides a community as evidenced by the fractures in Nundle and Walcha and now in Bendemeer.**

**If this was truly a community benefit fund, why wasn't it sold as a benefit to every resident of Bendemeer to try and promote community cohesion?**

**Was it the intention of the applicant to divide?**

**Does the applicant claim they were not aware of issues created in other communities?**

**Given the project is to create electricity and can power 74,000 homes, it would be a sound idea to ensure the CBF of approximately \$50,000/year was shared EQUALLY with every household in Bendemeer. With less than 500 residents, that would possibly pay the power bills of every household.**

The following paragraph is taken from the BEH web site:

The proposed solar farm will generate an estimated 577,000 MWh of renewable energy, and reduce greenhouse gas emissions by 420,000 tonnes CO<sub>2</sub>, per year. For scale, the project will generate enough energy equivalent to powering 74,000 NSW homes!

Biodiversity

Blakelys Red Gum - Important honey producer with large quantities of pollen

Yellow Box - Another excellent tree for honey production due to pollen

Rough Barked Apple

How is the removal of any tree a benefit to the environment?

Granite soils are highly prone to erosion – the project is sited in a mountainous area with endless water courses draining to the Macdonald River our town water source.

How is it possible to justify the removal of habitat that can in anyway impact the Squirrel Glider

(listed as vulnerable), Eastern Pigmy Possum (listed as vulnerable) and Tusked Frog (engangered)?

During the 2019 bushfires huge swathes of bush was destroyed – any animals fleeing the fires would have moved to areas at that time not impacted ie the project site. How is destroying further habitat in an area of high bush fire prone land help biodiversity and the environment as a whole?

Again, it needs to be pointed out that except for this project this area would be highly unlikely if ever to be cleared of hundreds of trees and the top soil removed – how is this acceptable?

Box Gum Woodland is a critically endangered EPBC Act listed TEC – how is it acceptable that this tree would be destroyed so that another tree elsewhere could be protected?

There is no mention of birds at all – why is this? Most birds nest in trees how will removing hundreds of trees not impact them?

Why is there no environmental section with regards to birds and the impact this development will have on them?

Tamworth Birdwatchers have on their list of birds spotted in Bendemeer the endangered Diamond Firetail which lives in grassy woodland as described exists on host landholder property to be cleared. What has the applicant/proponent done to ensure this endangered bird is not impacted if it does not appear to have even identified it in this EIS?

Aboriginal Cultural Heritage

Why does this state there are no Aboriginal Cultural Heritage sites when the Biodiversity map shows there is an Aboriginal Heritage Site (AHS) – what is the difference and why does AHS not appear to matter?

Bendemeer Station is a local landmark only a few hundred metres from the proposed industrial site. It is heritage listed. How is it considered unlikely the project will impact on the significance of the Station? This report claims it is of no aesthetic value – it is however of value to the people who value this area and placing a large scale industrial plant over the hills almost on top of the Station is unacceptable. This report shows no regard or understanding for the people of Bendemeer who value the area and is appealing only to those who are happy to change it forever for the worse.

## Noise

In an area of quiet, with rolling hills and ranges, any noise is magnified. How is any noise apart from that of the highway that passes through acceptable to Bendemeer? Our views will be destroyed and with it our peace and quiet and property values – how is this supposed to be acceptable to Bendemeer residents? Noise walls being constructed around the BESS and inverters suggest these particular items will cause great annoyance and disturbance to Bendemeer.

Noise travels up and over a wall and the project is sited on rolling hills – this is unacceptable.

Bendemeer inhabitants live a quiet country lifestyle which involves living with household windows open, one of the joys of rural living, also they enjoy their entire properties and are not restricted to within the walls of their homes – can you guarantee that no resident of Bendemeer and surrounding properties will be negatively impacted by the noise to be generated ongoing for upwards of 25 years by this industrial plant sited amongst family homes and almost on top of the Bendemeer village itself?

What financial compensation will be provided to families who find the noise unacceptable, a further impact on their quiet rural lifestyle and therefore may need to sell and move elsewhere? What compensation will be provided for a property price that will be lessened by the negative impact of the noise?

Window treatments in an area where windows are primarily uncovered and open are not an option as residents should not have to ruin their lifestyles further to accommodate this industrial site and keep their the same – living in a country area is different from how one may keep windows and doors locked, covered and closed in a town or city.

It is well known that the landholder does not reside on this property and will not be impacted by this development but is expecting that those impacted should accept their fate – how is this having social licence and how is this acceptable?

## Visual

Fieldwork undertaken suggests the project will have minimal impact on the existing landscape character or upon its defining features – how is this at all possible given the removal of hundreds of trees, the covering of grazing land with 430,000 solar panels, acres of batteries, inverters and associated industrial infrastructure?

Was the fieldwork undertaken by someone who valued the Bendemeer landscape?

The project will be sited on the hills to the East of Bendemeer village – most homes are sited so they enjoy views to the East – given the elevation of the project, its size, the fact it is a distasteful industrial project unsuitable to a beautiful rural environment – how is it in anyway possible that it will not have a massive impact on the landscape, views enjoyed by residents and visitors to the area? How is it possible that it will have a “low” visual impact rating given it is not a shed or a home it is nearly half a million solar panels installed on rolling hills that are currently beautiful to gaze upon? Most cities and towns have designated industrial areas for a reason – Tamworth has Taminda – people do not live in this area, they do not have their homes in Taminda as it is an Industrial area. Bendemeer does not have an industrial area it is zoned a rural area. It is not acceptable that the inhabitants of this area should have imposed on them a large scale industrial solar project, 250m wind turbines and powerlines. Bendemeer’s value is in its landscape. A basic timber home of little aesthetic value, gains in value if it is sited in a pretty village with a beautiful landscape. Home owners in Bendemeer will be financially impacted (negatively) if this project is allowed to be constructed – it does not have social licence, will further fracture community relations if it is allowed to go ahead.

## Soils and Agriculture

This project will impact on agriculture – the money received by the landholder for the project will far exceed any income agricultural pursuits on this land will gain. Presuming the landholder would have to pay income tax on monies received from the solar project and given information Save Our Scenery Bendemeer Action Group (SOS) has received from other communities where such large scale projects have gone ahead on agricultural land, in most cases the owner retires or does not continue to farm. Sheep may be grazed under panels to keep down weeds but it does not appear the agricultural pursuits are carried on at the same pace or scale as would otherwise be required if the landholder received income from farming alone.

This will be a massive problem moving forward as a result of allowing large scale industrial projects on agricultural land, perhaps the land can continue to be farmed but given the financial rewards of these projects why would the farmer bother with such hard work and higher taxes?

### Water Resources, Hydrology and Flooding

Bendemeer is located in the Moonbi Ranges, a high rainfall area (21mm received 19/8/23 but not elsewhere) with soil that is highly prone to erosion – constructing a large scale industrial project on such land is irresponsible and unnecessary.

SOS has been unable to locate such a large scale industrial solar project as unsuitably placed as this one. NSW Large Scale Solar Guidelines suggest it be on flat land (Bendemeer is not), avoiding watercourses, this will be sited on the hills that feed rain directly into the Macdonald River the lifeblood of our village – our town drinking water supply – how is this allowable development and how is this responsible development? High potential GDEs are mapped along the Macdonald River.

The project map overlay on page 17 is misleading the flood extent depth is hidden by the tree canopy image and flood risk is noted as minimal and ignores the 2008 flooding disaster and more recent events. Given that this seems to be a quite a significant run off area between courses there seems to be limited consideration of what impact tree clearing and change to vegetation will have on runoff and erosion into the surrounding water courses. Even with existing light tree coverage there are some areas of heavier coverage on the water courses that look to be cleared. The panels will concentrate water runoff which they know and they talk about erosion control measures, but this is very light on and do not really address the change in vegetation and expected changes to water flows. They state on page 73 that management will be in accordance with Managing urban stormwater, but this is rural site adjacent to riparian zones and that the soils are prone to erosion on page 102. Literature supports increased localised erosion as a significant issue on solar farms. Grass coverage of 100mm cannot be guaranteed (see page given variable seasons and summer and winter variations. See Appendix B Mitigation and Management Summary.

Reference regarding concentrated runoff example US but relevant: Yavari, Rouhangiz & Zaliwciw, Demetrius & Raj, Cibin & McPhillips, Lauren. (2022). Minimizing environmental impacts of solar farms: a review of current science on landscape hydrology and guidance on stormwater management. Environmental Research: Infrastructure and Sustainability. 2. 10.1088/2634-4505/ac76dd.

Unlikely, but is there any evidence of *Homoranthus prolixus* (Grannite Homoranthis) that is restricted to the Inverell and Bendemeer areas? Even if it is closer to the river have they considered changes that may impact?

It is known that solar panels change the immediate microhabitat and can have detrimental impacts on native plants that support native animals. [Microhabitats associated with solar energy development alter demography of two desert annuals - Tanner - 2021 - Ecological Applications - Wiley Online Library](#) There does not seem to be a lot in reference to addressing this issue especially given proximity to the river etc. and the flow on effects. Have they looked at potential impacts on animal corridors and local species in the area as references to all of this are superficial and formulaic not specific to this proposal.

Whole of lifecycle assessment, Harvard business review in 2021 noted most will end up in landfill with limited ability to recycle so significant downstream environmental impacts. [The Dark Side of Solar Power \(hbr.org\)](#)

On a broader scale, we don't know what the implications are in our regions as the footprint increases. [Study warns solar farms could impact climate, global warming - TheBlaze](#)

## Traffic

It appears that most workers, equipment etc will be entering Bendemeer from other areas – how does this benefit Bendemeer? As many who live in this area do so for the quality of life provided and make a conscious choice to work in town (Tamworth or Armidale), any increase in the traffic will severely impact locals. When the Inverell/Glen Innes wind sites were being constructed traffic was held up repeatedly by large loads coming up the Moonbi Range. This is the only way an ambulance can get in or out and/or any other emergency vehicle. It is not acceptable that a further impost on Bendemeer residents will be created by massive traffic increases, delays in getting to and from work, more time in traffic, more fuel used and if you are trying to reduce emissions yet creating more – how is this acceptable?

Page xi point 6 – “given the routes have been utilised by several other renewable projects” – exactly! We have been impacted time and time again and the endless projects being constructed in Bendemeer itself wind, powerlines, solar plus large scale projects in Walcha, Uralla, Armidale, Inverell and many other places all transit through Bendemeer. Of all the areas in the New England REZ, Bendemeer is the place most impacted, this is an unfair burden to be forced on our small community or any community for the benefit of others with our sacrifice – how is this social licence? How many traffic movements a day? What time of day will these occur? What days of the week will these traffic movements occur?

## Preliminary Hazard Analysis

Stored hazardous materials may not exceed SEPP 33 – does this take into account that this project is to be sited between two major highways in a high fire risk area – Bendemeer was cut off via for several days during the 2019 fires and that the project puts at risk an entire village?

As with almost every other similar project, SOS has not located ONE to be constructed so close to a residential village and a town water source. How does it make sense to locate this project on such an unsuitable site and not in keeping with the NSW Government’s own advice?

Why are allowances made for a potentially hazardous project in such close proximity to so many people?

## Bushfire

**The project area is bushfire prone land and should be deemed unsuitable on such a site as is too close to our village, on top of the water source (MacDonald River), on mountainous country - fire burns uphill – the siting of this project in such a location shows very little regard for the human inhabitants of the area. If something goes wrong and alarm bells are ringing in the media and the BOM for drought ahead and bushfires – who takes responsibility for a fire that could burn for days or weeks and being electrical take copious amounts of precious water to douse and perhaps will require the evacuation of the nearby village?**

## Air Quality

How does the project contribute to improvement of air quality in Bendemeer when it is already perfect?

Were Fossil fuels burned in the mining of the many material and rare earths required for this massive project and if so what was the amount?

Were fossil fuels burned to make the materials that will be used in the project ie steel, concrete, aluminium and if so how much?

How will the project abate the production of up to 420,000 tonnes CO2?

Is all the mining, production and transport required to make and bring the products to Australia, to Bendemeer along with the workforce and their transport, emissions etc taken into account?

Is the waste created during this entire process from ground to the site in Bendemeer and then its eventual demise in a few years also taken into account?



How is the demolition of hundreds of trees and other vegetation helpful in an otherwise pristine environment?

#### Waste Management

Is the waste related to the creation, installation, running and demolition of this project included in the 420,000 tonnes of claimed CO2 abatement?

#### Economic

**The Capital Investment Value of \$465,840.357 – for permanent fixed assets.  
This is not for the land upon which the project sits as it is owned by a resident of Sydney.  
If this Capital Investment Value is for the equipment arriving at Brisbane and Newcastle Ports and from Melbourne – how is this Capital Investment Value a benefit to Bendemeer?  
What land or equipment has been purchased in the local area for this project?  
In arriving at Ports SOS summarises that all equipment is from overseas suppliers and not from Australian suppliers – is this correct?**

We disagree that the project will have a minor and insignificant contraction of agricultural activity as it will cease almost altogether given the monies received by the landholder for such a project – apart from weed eating sheep, what incentive is there for farming to continue in order to make a living?

The annual direct construction employment from the project for up to one year is inaccurate and yet another insult to the residents of Bendemeer.

Bendemeer is the area that will be impacted with views ruined, property prices negatively impacted and control room type jobs advertised on SEEK for solar plants require electrical engineering and similar types of qualifications. Does the applicant expect to fill positions with Bendemeer locals?

In many conversations with the Bendemeer Energy Hub it has never been disclosed exactly what jobs are on offer. Why was it never advertised that particular jobs would be on offer for suitably qualified Bendemeer locals should the project eventuate? 15-20 full time positions where the repeated claims on most solar project web sites but it must be asked why calls to up and running solar plants are so guarded and not happy to divulge their full time work force requirements. Some are fully remote controlled sending out an employee should hands on work be required. Others plants have advised they install their plant in such a way there is no need for anywhere near the 260 workers claimed by this EIS.

Why was Bendemeer Energy Hub (BEH) (Athena/Metis Energy) not an exhibitor at the recent Northwest Careers Expo in Tamworth, May 2023? There were 90 exhibitors and only one solar company that unlike most other exhibitors, who provided a summary of their company in the official exhibitor handout, did not name any roles available for those seeking a career in the solar plant industry. Why are there claims of many jobs but the BEH cannot clearly state what those roles will be and did not try to engage school leavers in the industry?

The economic benefits reported in the EIS are all claimed to be for the regional economy and Bendemeer is not mentioned once – how is this fair to the area of Bendemeer, which will be the area most severely negatively impacted through the ruination of its landscape and quiet rural amenity let alone the division now sown between inhabitants?

Could the applicant please name each of the 35 direct and indirect jobs that will result from this project?

#### Last Paragraph

What are the range of impact mitigation and management measures that will be employed?

What are the perceived impacts of the project to the study area?

If the project is located on top of the village of Bendemeer – why are the LGAs of Armidale, Uralla, Walcha and Tamworth studied? Surely the impacts of this project so directly located on top of the Bendemeer village impact Bendemeer more so than any other area and therefore the study area should be in this area alone – expanding the study area to include these large towns in the other LGAs will spread the impact that Bendemeer alone will feel – how is this fair?

#### Social

One of the key drivers of social change is this project coming to Bendemeer, the applicant/proponent offering funding to groups to support the project at the detriment of those who stand to be negatively impacted, therefore creating division within the community. This same issue has plagued the communities of Walcha and Nundle and various other small rural communities and is unforgivable.

What exactly are the employment opportunities for the local workforce who by the way are already employed? Please name the roles, skills and hours required for each role – if everything else in this project has been described to the last degree, why can the proponent never describe the actual employment on offer?

SOS has been advised that the solar host landholder does not reside in Bendemeer, therefore it is not expected that the funds received will be put back in to the local village.

Employees have been residing at the local pub for lack of local accommodation – more workers will have a further impact on this situation. Also the building of this project on top of the village leaves little room for expansion if claims in the EIS are to be believed of huge economic growth and benefit.

#### S.5 Justification and Evaluation

There can be no justification for siting a large scale industrial project in the beautiful hills of Bendemeer. NSW Government Large Scale Solar Guidelines state this sort of project should be sited on flat land – this site is not flat – how can this be justified?

The land is not cleared as there will be hundreds of trees felled in the project – how is this justified?

This is in bushfire prone land – how can this be justified?

This project will destroy our landscape and ruin lives due to impacts of views and property prices and quiet and peaceful lifestyles – how can this be justified?

#### **Sydney Morning Herald:**

**It's true Australia is responsible for about 1.2 per cent of global emissions.**

If Australia contributes only 1.2 to global emissions how can such a negative impact on tiny Bendemeer be justified? If Australia is responsible for only 1.2 per cent, Bendemeer would account for basically nothing yet is expected to should a massive burden with its tiny footprint.

Bendemeer is going more for the environment by continuing to be small, sit lightly on the land and maintain the trees and plants that it already has. How is destroying such a vast piece of land and all the trees and plants and animals with it any good for the environment?

If Carbon Dioxide is the issue then removing more trees is not the answer.

Mining is increasing 2000 per cent in order to keep up the demand for so called green energy – how is destroying the environment of Bendemeer by covering such a large portion in a solar industrial complex, power lines and wind turbines?

The project will not supply 24hr energy – what energy will be required during times when the sun does not shine? This project cannot power homes as it does not provide power 24hrs per day.

How long can the BESS power the village of Bendemeer?

We dispute the description of this project as Ecologically Sustainable Development – it is not. This project will ruin the very environment that is claimed you are trying to save. It will fell perfectly good trees and habitat, cause fauna to die and relocate all for monetary gain.

The employment and economic opportunities from the project have not been supported by the community during engagement – this is not a true statement.

Some in the community may support the project expectedly for monetary gain.

Some in the community may support the project for hopes of a job – we are not aware of exactly what jobs are on offer – please provide details?

Bendemeer is not a prime location for solar resources given its climate ie heavy cloud, fog and rain more so than other areas. It is being singled out for its close proximity to a powerline and therefore reduced cost to the proponent – is this correct?

We refer you also to the solar energy map (below). Bendemeer is located in a below average solar energy area. Bendemeer is not flat nor clear of trees nor devoid of water courses nor sited in a low fire risk area away from human beings and their homes – why does the Singapore based proponent insist on placing this industrial plant in the most unsuitable location where it is ruining the lives of so many who do not wish our area to be industrialised?

Will the project provide 24/7 energy to Bendemeer and will our power bills be reduced?

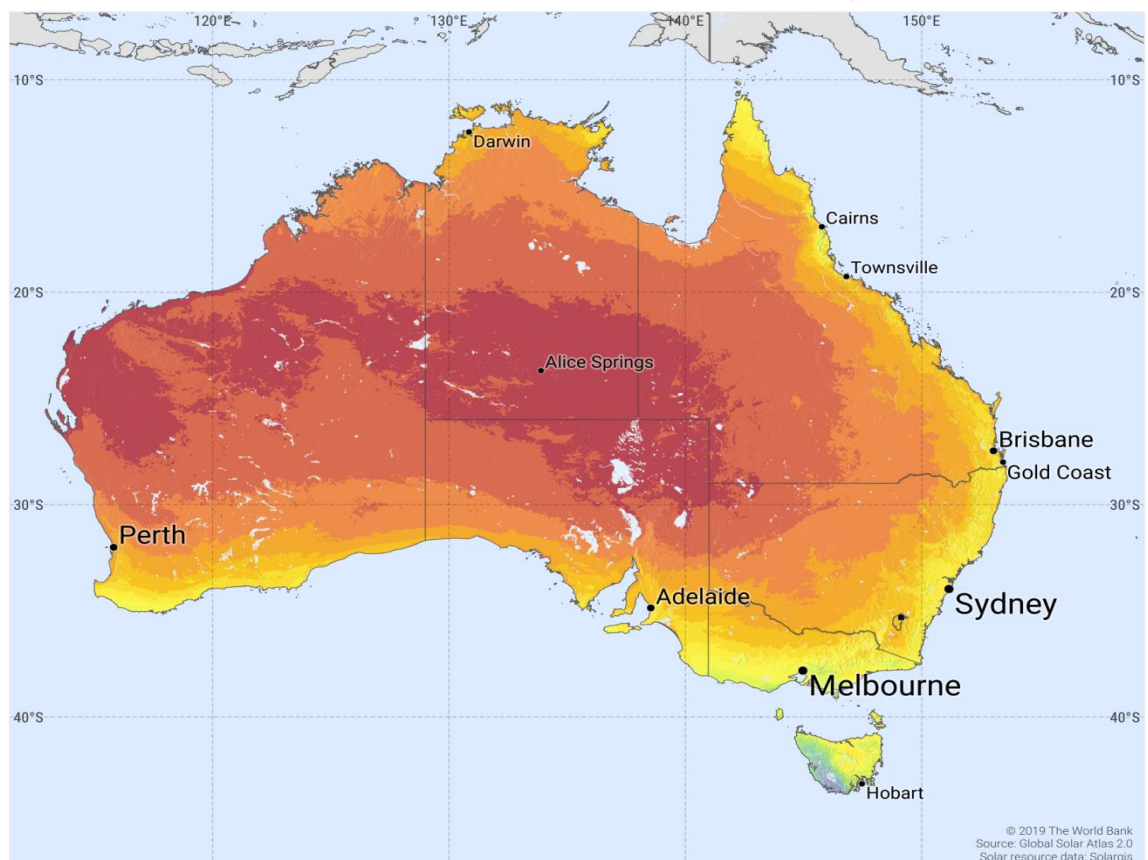
SOLAR RESOURCE MAP

## PHOTOVOLTAIC POWER POTENTIAL AUSTRALIA



ESMAP

SOLARGIS



This map is published by the World Bank Group, funded by ESMAP, and prepared by Solargis. For more information and terms of use, please visit <http://globalsolaratlas.info>.

EIS states will be 307 full time equivalent jobs through construction – previously stated 260 – which is correct? Also 15 FTE jobs during operations yet previously stated 35 – which is correct and what exactly are the 15 FTE jobs and what qualifications will be required?

How can the project deliver 880 direct and indirect jobs – to whom and to where?

Who is in charge of the CBF and how is the funding distributed? Will only those who have approved of this project have a say? Will this continue the division this project has already created in the Bendemeer community? How can this be justified – this does not show social licence but the opposite.

How can residents lodge complaints with regards to the project construction, operations etc should it proceed? To whom will they lodge their complaints and by what means?

\$80 million in direct and household income – does this apply to Bendemeer specifically or again is it everyone benefits but only Bendemeer pays a price?

How is Metis Energy Limited based in Singapore able to claim a greener society when responsible for large scale industrialisation of a beautiful rural community and felling hundreds of trees and clearing top soil in the process?

#### Project Overview

Map shows exactly how ludicrous the siting of this project on top of Bendemeer is, when the landscape goes on for miles in all directions yet the applicant insists on causing division and harm especially to the mental health of those who oppose this horrendous project.

#### Project Objectives

71 direct and indirect jobs? This figure changes repeatedly through this EIS plus conversations with the BEH – what is the correct information?

The community has been ill informed from the beginning. The last CENSUS showed lower than average internet connection in Bendemeer, a high retiree population therefore is expected that there are some in the Bendemeer village who are still not aware of this project and/or the actual negative impacts on the area if it is permitted to go ahead, which do not want to happen and we trust that the NSW Government will see how wrong this development is for the area and how much damage it has already done and will continue to do to the area and the locals who call this home.

#### Project History

How is this suitable topography?

The following link is to the NSW Government Large Scale Solar Guidelines:

[https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub\\_pdf/Lisa+Drupal+Documents/16007 DPIE+Large+Scale+Solar+Energy+Guidelines\\_26-9-22.pdf](https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub_pdf/Lisa+Drupal+Documents/16007_DPIE+Large+Scale+Solar+Energy+Guidelines_26-9-22.pdf)

Site Selection pages 21, 22 and 23 from the NSW Government Large Scale Solar Guidelines have been pasted into this submission (below) in order to highlight that this project is sited in the wrong location for many reasons and does not adhere at all to the NSW Government Large Scale Solar Guidelines and therefore should not be approved.

**It should be noted by the applicant has it has not been identified in this EIS that there is an in use airstrip less than 5kms from the project site located on “Vermont” Airlie Stock Route Rd, Bendemeer.**

# 4. Site selection

Good site selection provides an opportunity to avoid or minimise negative impacts at the outset of a development, allowing the design and assessment of a project to focus on mitigating and managing unavoidable impacts.

## 4.1 Importance of site selection

Well-sited solar energy projects can have minimal impacts on the environment, surrounding land uses and the community. A good site may result in greater social licence to operate, shorter assessment timeframes, reduced offset obligations and fewer conditions of consent to manage residual impacts.

Sites with multiple environmental and planning constraints may still be capable of being developed in a suitable manner with good design, innovation and appropriate mitigation measures in place.

The consent authority is obliged to consider the merits of each application.

If the applicant is not proposing to avoid constraints, justification for site selection and the layout of the development must be clearly outlined in the EIS.

## 4.2 Process of site selection

There are many technical and commercial factors that need to be considered when selecting a site for large-scale solar energy development. These include:

- proximity to the existing transmission infrastructure
- available connection capacity
- level of solar radiation
- distance to major towns, cities or other major energy users
- proximity to major roads and transport infrastructure
- size and shape of land parcels
- development restrictions including land use zoning and proximity to regional cities.

These considerations limit the areas that are suitable for large-scale solar development.

Applicants must also consider other environmental issues and land use conflicts when selecting a site, such as the agricultural productivity of the land, visibility and topography of the site and biodiversity values.

Variations in topography can reduce the usability of land and minimise the efficiency of energy production (by increasing the potential for panels to overshadow each other). Higher gradients will also increase construction costs, create access challenges and increase the potential for erosion and sedimentation unless substantial controls are implemented.



The solar site in Bendemeer is equal to the far left column depicted in landscape shown and therefore:

**Negatives • Very high potential for visual impacts • Very high potential for biodiversity impacts • Significant topographical**

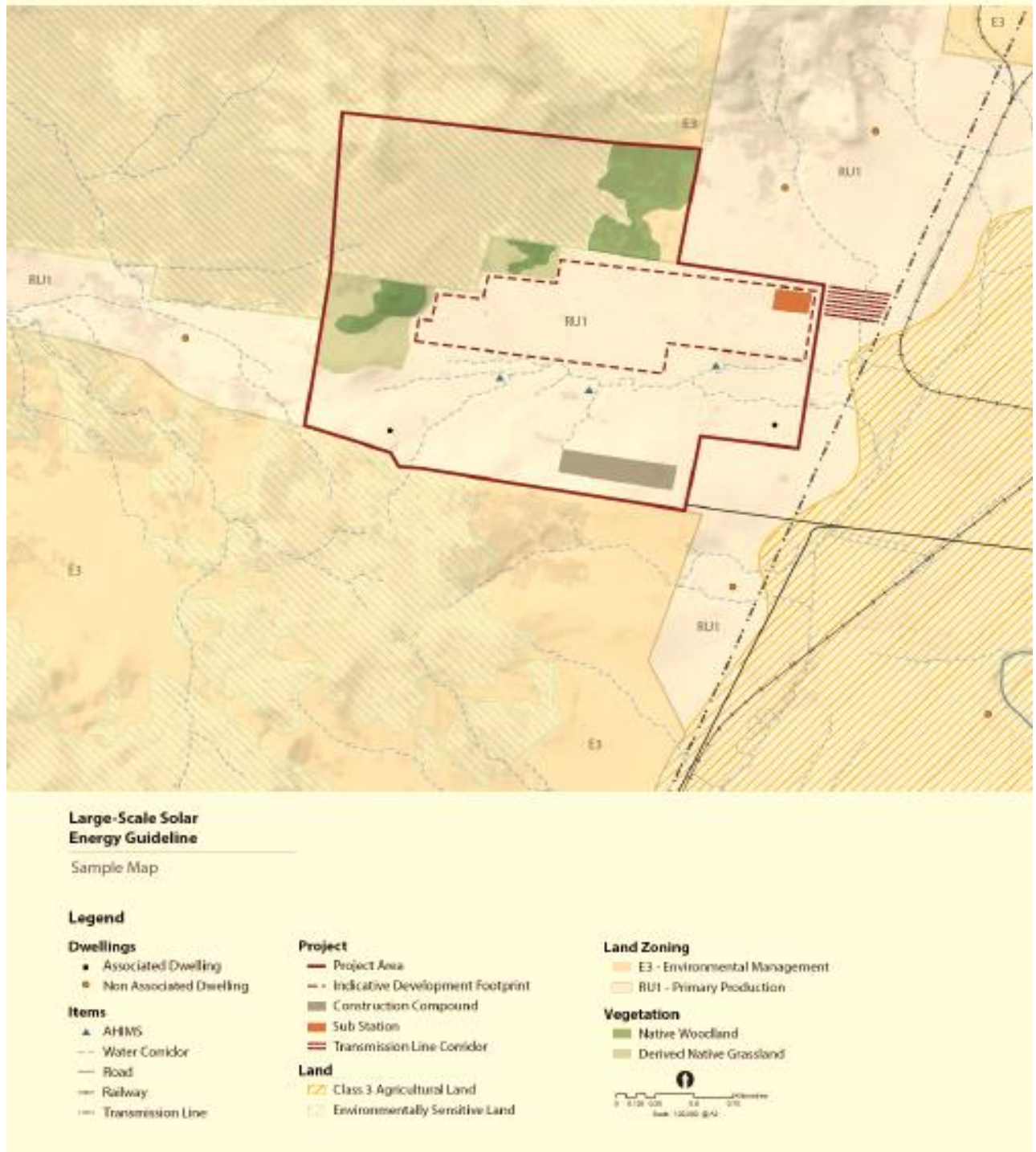


## Constraints Map

Too close to village and family homes. Impacting views, lifestyle, quiet enjoyment of properties, native grass and woodlands and protected animal species, bush fire zone, water run off feeds into MacDonald River village drinking water supply etc.

4. Site selection

Figure 3: Constraints map



### 1.5.2 Key Strategies to Avoid, Minimise and Offset Impacts

Proponent did not avoid environment and social impact but is causing them.

Has not avoided environment and social impacts by placing the project on top of our village.

What is the point of an offset if damage must be done to the environment to require an offset?

## 1.6 Related Development

YES – Bendemeer will also be further negatively impacted by a wind project with turbines of 250m high with blade diameter of 162m. If the solar has not done enough damage and hurt enough lives the wind will surely finish the job. Our Wedge Tail Eagles regularly soaring above our properties, gliding along looking down for prey will be demolished. This information has also been confirmed first hand by a wind host in Inverell/Glen Innes who afforded the information re 5 eagles kills in a few months but refused to go on any record in fear that such shocking information could jeopardise the expansion of this same project and therefore impact this person financially and of course we are bound to respect this person's request.

Sadly these projects are all about financial gain at the expense of rural families and the environment. SOS are writing this submission in the hopes that someone will see sense and recognise that such a massive solar complex in the first instance followed by wind by powerlines will destroy our beautiful rural landscape, our lives and the environment we cherish.

## 2.1 Security of Energy Supply

The solar and or wind project cannot provide security of energy supply as they do not produce energy 24/7 and will always require back up generation – is this statement correct?

### 2.2.1 United Nations Sustainable Development Goals

- Goal 7: This project will not ensure access to affordable, reliable, sustainable and modern energy for all. Energy costs have never been higher, unfortunately SOS members know many especially elderly residents who will not heat their homes due to fear of bills putting their health at risk. Solar and wind are not reliable and they are not a future but an old technology with a massive footprint.

*A modern energy source would have a small footprint not take up an expected few hundred thousand square kilometres of land (primarily agricultural).*

- Goal 11: So by following a UN goal this solar project imposed on Bendemeer will save the air quality of the big cities – again this is totally unacceptable and does not show social licence. We are not 2<sup>nd</sup> class citizens but do more for the environment due our love and care for the countryside than any city dweller just by virtue of how and where we live.

### 2.2.10 New England REZ

How is this project to deliver affordable energy to the residents of Bendemeer when most are suffering due to continual price increases and the green energy push is costing taxpayers billions of dollars?

### Table 2-2 Tamworth Blueprint

How does a solar plant covering beautiful agricultural land in a high rainfall area (further 21km 19/08/2023) meeting a “design with nature” theme? Or how does it celebrate culture and heritage given the location of the Bendemeer Station and other historic areas in Bendemeer Village?

How is the energy generated by this plant low cost?

The project is located in the catchment area of Macdonald River which is narrow and dominated by rural landscapes – this project will impact on the catchment and therefore the river in many negative ways and should not be allowed to proceed.

126 dwelling within 2kms of the project – this is not acceptable. How are so many residents dismissed in this report? 60 non-associated dwelling in project area – who determines they are non-associated and what does this mean?

Figure 2-4 Shows the unacceptable location of this project to the majority of family homes in Bendemeer.



## 2.5 Project Alternatives

### 2.5.1 NO PROJECT

The NO PROJECT ALTERNATIVE must be considered!

NOT proceeding with this project will represent the status quo, will avoid development impacts and should accept that there are far too many project negatives that well outweigh any project benefits. Only a minority primarily concerned with monetary gains and not about the beautiful Bendemeer environment will gain but so many more will lose.

This project hanging over our lives, the work involved in just trying to have a say, reading a complex 2060 page EIS and responding within 28 days. Bendemeer has also been impacted by internet maintenance advised by Telstra from 15-30 August, 2023. The division created, friendships torn, stress and mental health are all very real. Many discuss selling and leaving the area they love if what they love most – views over a beautiful peaceful landscape and beautiful environment are destroyed forever. It is not easy to sell a generational farm or a forever home built by a newly married couple or family locating to this beautiful area to raise their children, with many retirees who love sitting on their front verandah enjoying their environment. We do not live within our walls but throughout our rural properties be it a town block or acreage. The views impacted from the front paddock are no less important to us than the views impacted from the front verandah – it all matters greatly to country people.

This project should not go ahead!

This project will take from Bendemeer the very things that make it special.  
We do not believe the claims made that the benefits of this project outweigh the negatives.  
If the aim of the game is to save the environment the NO PROJECT alternative is the right one and the only one the NSW Government can decide.  
We are a massive State – this project goes against the NSW Government's own guidelines.  
There is not one solar plant of this scale located as close to a village and in this type of terrain that has been located by SOS.

SOS doubts the employment claims made and that the full time roles will be given to Bendemeer residents.

To reside 40kms from Tamworth and approx 70kms from Armidale is to do without major supermarkets, hospitals and other big city conveniences - we do so because OTHER things matter to us and that is what makes us a small country village.

If this development proceeds, it will ruin the landscape and rural qualities that make Bendemeer beautiful and special. Please leave the environment as it is and leave us alone.

## 2.6 Key Potential Risks

States project requires flat, cleared land with plenty of sunshine this is not a description of the Bendemeer site.

### 3.3.4 Electrical Reticulation and Grid Connection

8 x lightning protections masts suggests this site will be highly susceptible to lightening strike in a high risk fire zone located amongst many family homes and on top of the Bendemeer village – how is this acceptable?

### 3.4.7 Ancillary Activities

Where will the sand and gravel be obtained from for the project?

### 3.4.8 Services and Utilities

#### Water Supply

If we are in drought will the project still proceed with requiring approx 110 megalitres per annum?

How can you justify such a massive use of precious water? This is not a green project.

How much water will be required to douse a fire at the solar plant should a battery combust?

## 5. Stakeholder Engagement

The applicant is not committed to public concerns and comments as it is proceeding with the project despite repeated request from community members for the project to go away.

A sense of ownership and social licence to operate has not been obtained from the majority of concerned Bendemeer residents. It is only those who stand to benefit financially in the community at the detriment of others that are supportive of the project.

### Table 5-1 Stakeholders Identified

#### Community and Business Groups

Many of the Bendemeer groups listed cross over where membership is concerned and only SOS would contain different membership.

Primarily the groups mentioned if supportive of the project would appear to do so for monetary gain and not for the continued protection of the Bendemeer environment.

Is the BEH and the Tamworth Chamber of Commerce affiliated?

### 5.2.4 Community Engagement

Meeting with hosts as early as 2018 and the Bendemeer community 2022 – a long time for future impacted residents to be unaware of a major project about to impact their lives.

A letter was received by SOS after much insistence that reply be made in writing however, do not recall the Project Fact Book?

What has the Kootingal Lions Club to do with the Bendemeer Solar project and why should their support or otherwise matter?

Why did the NSW EPA not wish to reply to solar farm enquiries?

Tamworth Council primarily interested in the CEF – again the hopes for monetary gain appear to outweigh environmental and human concerns and does not show social licence.

### Threatened Ecological Communities

Natural Grasslands (critically endangered) to be impacted?

New England Peppermint (critically endangered) to be impacted?

Suitable habitat for Squirrel Glider, Eastern Pygmy possum and Tusked Frog all within disturbance footprint of project?

Disturbance footprint encompasses Box Gum Grassy woodland and koala habitat and Grey headed Flying Fox habitat but this will be destroyed for this project?

What will the impact be on this habitat during the construction phase and ongoing operations given the project makes a continuous noise for the next 25 years with added lighting and security fencing etc?

#### Table 6-6

Destruction of approx 150 hectares of vegetation – how is this acceptable to anyone?

##### Indirect Impacts

The indirect impacts are enormous and would shock anyone that believes this project is a good idea and will help the environment as it in turn destroys it.

The 6 impacts are unacceptable – “Increased risk of starvation, exposure and loss of shade or shelter” let alone with other impacts all of which are absolutely unacceptable.

Microclimate under the solar arrays – the BEH would argue that everything is fine for animals under the arrays but this is of course not the case. The BEH and the applicant do not seem aware of the extreme temperatures of Bendemeer with only two weeks ago -11 degrees being experienced.

The fauna movement corridors is a huge impost on the animals especially if there is a fire.

#### Table 6-8

Project will destroy Threatened White Box, Yellow Box, Blakeleys Red Gum, Grassy Woodland and native grassland?

Koalas are present along with the Grey headed Flying Fox yet this project is not expected to have a significant impact on these threatened species? What about the next fire?

#### 6.2.5 Offset Requirement

What does this mean and what does this entail?

How are trees felled allowing fauna a chance to relocate good for our environment or the fauna?

Applicant acknowledges the devastation required of clearing such a diverse and productive landscape to install an industrial solar project. This is irresponsible. There are tracts of land where there would not be any habitat, any fauna or flora – how can this destruction be justified by this project? It cannot.

Nest boxes will be installed to make up for the destruction of trees – this does not have social licence is destroying a beautiful environment and does not make any sense at all.

#### 6.4 Historic Heritage

So many historical buildings in Bendemeer and will all be in such close proximity to the solar development.

Bendemeer Station will be impacted for the negative effect on its farm stay accommodation if for nothing else as extremely close to this development.

#### 6.5 Noise

11 hour days of work and even on Saturdays will have a negative impact on locals.

##### 6.5.4 Noise Impact Assessment

##### Construction Noise Impacts

Why a conservative calculation? Why assumed flat topography?

The hills are very different to sound out on the flat. Suggest that the hills will increase the noise problems. When the wind is blowing from the East the traffic alone is magnified therefore it is expected that the noise from an industrial plant situated East of the village will cause many complaints and negatively impact many who just want to live in peace.

SOS understands Receiver ID 29 does not live on said property therefore will not be impacted directly by any noise impacted on neighbours and the village.

### 6.5.6 Cumulative Noise Impacts

With the solar, expected wind and further wind and powerlines projects to be located in the vicinity of Bendemeer residents are expecting their quiet country lifestyle to be forever negatively impacted and property prices to substantially diminish.

#### Table 6-32 Landscape Character Assessment Summary

Picture of a 375,000 solar complex over 323 hectares and this is how it looks.

Bendemeer will have 430,000 panels over twice the amount of land with over 36,000sqm of battery etc – **SOS was unable to locate a pic of a solar complex on rolling hills as an example as it appears most a more appropriately sited on FLAT LAND.**

The Bendemeer solar project will destroy the character of Bendemeer, not improve it.



#### Viewshed Mapping

The mapping is taken from a dwelling and therefore totally misses the point of rural living. Views from a home are important but so are the views from the same rural property. How is it that this is not taken into account in a rural area?

#### 6.7.3 Site Specific Agricultural Attributes

South half of the project area slopes down steeply to the MacDonald River – this is bound to create issues with erosion and water run off containing unwanted contents into the Bendemeer drinking water supply.

#### Soil Erosion

High risk of dispersion if these soils are disturbed.

Elsewhere in the EIS it is stated that top soil will be removed for the installation of the power plant.

#### 6.7.5 Land Use Conflict Risk Assessment

Property devaluation – this is inevitable not just a risk. How will landholders that choose to leave the area be compensated for a loss that will incur through no fault of their own but due to this unsightly project?

**Not one country lifestyle magazine features solar projects when showcasing beautiful country properties. This project will never be a selling feature and have a downward impact on prices.**

#### 6.7.8 Mitigation and Management

Why are Landcare guidelines to be used (2004) twenty years old?

Why are topsoils and subsoils removed? Won't this severely impact erosion, destroy more habitat as many creatures live in the top soil?

#### 6.8.2 Existing Environment

Suggest Bendemeer temperatures range from over 40 degrees to negative 13 with negative 11 only two weeks ago and more consistently dropping to an average of minus 4 degrees on a regular winter daily basis. Most wood fires are run for half the year commencing around ANZAC Day with the first frost.

#### Water Supply Options

How is it allowable for water destined for stock and humans be diverted for an industrial complex?

What will happen should water become a scarcity again?

What will be the impact on the waterways during and after construction?

#### Traffic

95% of workforce coming from Tamworth or Armidale – does not appear to benefit Bendemeer?

Delay at intersections of 2.3 seconds and 2.0 seconds – has winter fog been figured into this data ie pea soup cannot see in either direction when needing to pull onto the New England Highway from Bendemeer?

Are workers arriving from 6am or 7am – conflicting information in the EIS?

Cumulative developments will severely impact Bendemeer residents.

#### 6.10.2 Hazard Identification

Appears a lot of very dangerous issues and hazards related to the acres of batteries and other materials that will be stored on a site precariously close to a residential village and other small village holdings where families reside. This seems totally unnecessary given the land mass of NSW let alone Australia.

Information provided in these pages regarding the hazards associated with this project do not in any way impress upon SOS that this is a green project and will benefit the environment in any way.

100, 000L water tank on site to help with fires in the project site – not a good use of water considering Bendemeer had major issues during the last drought when water was being trucked in.

#### Figure 6-25 Tamworth Annual and Seasonal Wind Roses 1957-1992

What does the wind in Tamworth over 40kms away have to do with Bendemeer at the top of the Moonbi Ranges? We are in different climate zones one is North West Slopes and Plains whilst we are Northern Tablelands.

#### Impact on Agriculture

The land could be better managed by a proactive landholder rather than being covered in steel and glass etc.,

#### 6.15.5 Mitigation Measures

##### Local Employment Plan?

BEH did not list as an exhibitor at the recent Northwest Regional Careers Expo in Tamworth, May 2023.

95% of workforce to come from Tamworth and Armidale areas.

BEH unable to ever specify roles to be available, skills required and hours of work or remuneration.

Solar farms in table given as evidence of distance from Bendemeer however, it does not show that not one of these projects are located on hilly terrain, near a water source or more importantly than anything else – not one of these is as close to a village as the proposed Bendemeer project and this is why it should not be allowed to proceed.

## 7. Project Justification

This project cannot be justified.

It will impact the environment and has already had major social impacts and divided our community and this will continue to be the case.

High biodiversity areas will be damaged – they are more useful to the world left alone.

Visual destruction of our beautiful landscapes will never be repaired as well as the impacts of noise etc on residents and visitors to this area.

## **Traffic Impact Assessment**

Traffic will impact Bendemeer coming from all directions for a various array of projects, as Bendemeer sits at the apex of the Oxley and New England Highways – the only way in and out of Bendemeer and to the northern and eastern areas of the NE REZ.

### **Table 3**

This shows all the many different projects in the New England at it is absolutely overwhelming on the environment and the people who are trying to live here in peace and quiet.

The traffic movements will be far greater and do farm more damage to roads and lives than we believe can possibly be assessed.

Are the emission being measured and added to the project claims of reduced CO2?

The traffic movements by heavy vehicles just from the ports of Newcastle and Brisbane alone will be massive.

### **7. Sears Response**

How can the proponent claim the expected increase in traffic on our roads will continue to operate to operate with a good service level? Regular roadworks are conducted between Armidale and Tamworth with Bendemeer in the middle – has this scenarios been taken into account?

Why does it refer to other locations – what about Bendemeer?

## Bush Fire Assessment Report

What is an APZ and how does the APZ dimensions ensure critical components of the solar project and BESS are not exposed to radiant heat levels especially if we have a return to drought conditions or there is a bushfire as this project is in a high fire risk zone?

### 1.2 Assessment Approach

States the scoping report was to explore the potential for increased fire risk because of this development and that it is going to be sitting on land designated bushfire prone by the TRC and NSW Rural Fire Service.

### Topography

Undulating and rolling dropping to the north and south and along a ridgeline.

The slope of the land determines the fire spread and intensity – each 10 degree increase in uphill slope a fire will double in rate of spread and intensity.

Yet again another reason why every other solar project especially one of this size is located on flat land and not on top of a residential village.

Why if it is a SEARS requirement that the location of solar energy infrastructure should avoid any land subject to a hazard like bushfire is this project located in such an area?

This picture below taken from the Armidale Express newspaper article about a fire that directly impacted the stock route alongside the solar site but for the quick work of the NSW RFS did not impact the project location on this occasion – Oxley Highway Bendemeer in April, 2023

## Information from NSW Rural Fire Service

ALERT LEVEL: Advice

LOCATION: Oxley Hwy, Bendemeer, NSW 2355

COUNCIL AREA: Tamworth

STATUS: Under control

TYPE: Grass Fire

FIRE: Yes

SIZE: 10 ha

RESPONSIBLE AGENCY: Rural Fire Service

UPDATED: 10 Apr 2023 19:23 More information





Photos below are of the 2019 fires that impacted Bendemeer and cut it off from Tamworth for several days. Known as the Moonbi Complex Fires.



Figure 4

Showing extent of Moonbi fires and proximity to the project and Bendemeer village should be evidence enough that this project is in a dangerous location and poses a real threat to the inhabitants of Bendemeer should something like this happen again or should the project have a fire incident.

BESS installations comprise large numbers of energy fuel cells (batteries), consisting primarily of a variety of lithium chemistry technologies. A failure event within a lithium chemistry battery (overcharge, equipment failure, physical impact, etc.) has the potential to lead to a thermal runaway event within the BESS, which may pose the following significant risks and challenges for fire fighters in the management of an incident: • Toxic smoke production • Rapid rate of fire spread • Vapour cloud explosion or deflagration • Exothermic chemical reaction fire that cannot be extinguished • Significant incident duration (in the order of days) • High voltage electricity (stranded energy) • Potential for re-ignition • Contaminated cooling water runoff

For all reasons above and more, it appears that neighbouring properties will incur substantial insurance premium increases insurance premium increases to already heavily negatively impacted neighbouring properties of such an industrial development – yet another reason this project does not have social licence.

## Appendix B – Mitigation and Management Summary

### Soil Stripping for Rehabilitation

This would indicate that the solar project requires the removal of the top soil from the project site in order to build the project – is this correct?

To what depth does the soil get removed?

How is the soil removed?

The top soil would be stored for future rehabilitation – this again shows the project is not environmentally friendly and destroys the land upon which it will be installed.

“Soils store more carbon worldwide than is contained in all plant biomass. They need much more attention as we project the fate of forests and grasslands to the changing atmosphere,” said Jackson, who is also a senior fellow at the Stanford **Woods Institute for the Environment**.  
Rob Jackson, Professor, Stanford University, USA

### Events and Community Sponsorship

It is untrue that the Bendemeer Campdraft and the Rodeo 2023 in Bendemeer were sponsored by the applicant. SOS understands the applicant caused a major rift within the community and impacted friendships of many years as the sponsorship pitted those opposed and for the project against one another where there were previously no problems, only teamwork and friendship.

Sponsorship of the Bendemeer Art Show is a once a year event, the Fergie Muster tri-annual and whilst this funding would be appreciated by those involved, it further divides the community. Acceptance of funding, whilst understandable, results in a monetary gain by some but a huge loss on the part of friendships, our landscape, our environment, property prices, rural amenity, peace and quiet and the misery of others.

### Community Survey

How can it be stated that 97% of the community have some level of awareness of the project when only 50 from the Bendemeer regions took part?

How can it be stated that 62% of the community is supportive of the project when only 50 from Bendemeer took part?

What were the main reasons for approval of the project?

SOS has many more members than the survey itself obtained a response from.

## **Conceptual Soil and Water Management Plan**

Why does this report reference Urban Stormwater?

This is a rural project in a rural area.

Why are the erosion controls, which are an extremely important part of this project given it is on mountainous terrain, on soil easily eroded and in a catchment area for the MacDonald River the source of Bendemeer drinking water, not feasible or required at this stage?

### **Specific Construction Activity Mitigation Measures**

#### **Trenching**

Separate topsoil and subsoil during excavation and ensure that topsoil is replaced on the surface – elsewhere in the EIS it is stated that the topsoil is to be removed from the site and stored. What area is this referring to and why is it treated differently?

#### **High Risk Areas**

Describes high risk for potential erosion due to slope of site and proximity to waterways (MacDonald River – town drinking water supply). Another reason that this project is unsuitable and should be on cleared flat land away from a village of hundreds of people. Why does the applicant insist this project be located in such an unsuitable area?

## Social Impact Assessment

### Project Applicant

Metis claims to have a deep understanding of the renewable energy sector however, Metis does not appear to have the same deep understanding of rural communities in Australia.

Rural communities exist in rural Australia primarily through choice. Rural inhabitants love their surroundings and their environment. There is a big difference between the two hence the term “city slicker” or “towny” to describe a person who prefers to live in a city or a large town, which is an entirely different lifestyle. City and town people generally like the closeness to work, restaurants, sporting facilities, cinemas, supermarkets, health services etc., rural inhabitants or country people for the most part, accept there is a difference but acknowledge that you can only have a wonderful country lifestyle if you do without city/town conveniences.

Bendemeer is 40kms from Tamworth and approx 70kms from Armidale, a few hundred kilometres from Sydney. The village has a pub a store/cafe and a fuel station and post office. Bendemeer sits in the Moonbi Ranges 815m above sea level with many homes surrounding the main street sitting a lot higher – Tamworth is only 404m above sea level and Armidale at around 1000m is the highest city in Australia. Bendemeer sits within the Northern Tablelands weather zone where as Tamworth, a different climate, is in the North West Slopes and Plains.

Bendemeer is also home to the Lowe Observatory, built by Astronomer Lindsay Lowe and placed in this spectacular location for Bendemeer’s magnificent dark night sky.

Has Metis considered the impact its solar and wind projects will have on this area?

This facility has not been mentioned in the EIS.





#### Table 1-1 Project Summary

The Capital Investment Value of \$465,840.357 – for permanent fixed assets.

This is not for the land upon which the project sits as it is owned by a resident of Sydney.

If this Capital Investment Value is for the equipment arriving at Brisbane and Newcastle Ports and from Melbourne – how is this Capital Investment Value a benefit to Bendemeer?

What land or equipment has been purchased in the local area for this project?

In arriving at Ports SOS summarises that all equipment is from overseas suppliers and not from Australian suppliers – is this correct?

#### Construction

##### Transport Route

Main and minor deliveries of equipment are all coming from Ports in Newcastle and Brisbane also from Melbourne – what benefit did Bendemeer or this regional area obtain from the acquisition of this equipment? If equipment is arriving at Ports should it be presumed that all equipment is from an overseas supplier and not even from Australia?

This is of no benefit to Bendemeer or the local area.

The Capital Investment Value of \$465,840.357 would be for the equipment to build the project is this correct?

The land is not owned by Metis/Athena but by a resident of Sydney so this is not money invested in Bendemeer either – is this correct?

Duration of 18 months – how is this presumed to be acceptable to Bendmeer residents?

We are a quiet rural area and any noise associated with this project will impact on residents near and far due especially to mountainous terrain. This does not show the applicant has social licence as this will be unacceptable to residents disturbing their peaceful enjoyment of their properties.

#### Operations

24/7 – Bendemeer residents will be impacted around the clock by noise from this facility for the next 30 years located in a dark sky area with minimal sound. The Highway tapers off early and sound travels for miles and is magnified in the mountains. This is not an acknowledgement of social licence to place a 24/7 industrial power plant in the midst of a rural community.

Operations Workforce – this information has changed repeatedly within this EIS. Approximately 15 FTE?

How does the applicant not know exactly how many employees will be required to run such a facility and what these roles will be?

A SEEK search conducted online by SOS for solar project jobs, the like that may be involved with such a project as the applicant is proposing returned:

Solar Site Manager – engineering degree required

BESS Site Manager & QA/QC Supervisor – Electrical trade qualification or degree in civil or electrical engineering, construction management

Are these the types of positions that will be offered?

Are these positions to be drawn from the residents of Bendemeer?

If there are not persons suitably qualified in Bendemeer for these roles will the applicant be sourced from outside this area?

Will the applicant be required to move to Bendemeer village?

If the applicant is sourced from outside Bendemeer village and does not relocate to the Bendemeer village upon accepting a role, this does not benefit Bendemeer.

## New england North West Regional Plan 2041

The project will exacerbate land use conflicts in covering approx 1500 acres of agricultural grazing land with industrial infrastructure with income for the host landholder de-incentivising farming practices as with other similar projects, farmers retire or no longer need to farm the land to earn an income.

This project does not encourage sustainable and resilient building. Extensive mining has gone into the creation of the project materials which appear to be coming from overseas by way of the Ports of Newcastle and Brisbane. This project has an expected life of 30 years however, it can not be expected that great leaps in technology will not have resulted in a far better energy source with a smaller footprint in the next few years rendering this project unviable and therefore a waste product.

The applicant does not appear to understand the impact on views associated with this massive project on rural mountainous terrain and suggestions that plants will grow sufficiently to have any chance of screening this eyesore project in a timely manner in the Bendemeer climate have been overestimated to say the least.

The character of the village upon which the project almost sits will be impacted and the applicant appear indifferent to this.

No equipment is coming from the area and most employees will be sourced from elsewhere. Bendemeer will incur all negatives of the project with very little benefit that could possibly in any way outweigh the losses of views, peace and quiet and social harmony that has been severely impacted by the onset of this project.

### Tamworth Regional Local Environmental Plan 2010

How does the income provided to the host landholder make their farm more resilient to the impacts of drought, fires and commodity prices?

Doesn't the project increase the impacts of drought and fire? The only positing to the land is the financial benefit to the landholder not to the land itself.

What farming will be carried out moving forward when the host is receiving income from the project?

### 1.2 Phase 2: social Baseline Data Collection and Analysis

Project has already caused substantial and possible irreversible change in the Bendemeer community and it is not for the best.

Some may support the project for monetary gain over all else creating a schism within the community that will grow ever wider as the solar then wind and powerlines destroy forever what the majority value.

### 2.4 Phase 4: Enhancement, Mitigation, and Residual Impacts

The project is the sole and primary cause of the negative social impact on the Bendemeer community.

Social impact will be permanent and unfortunately negative.

## 3. Scoping: Social Locality and Stakeholder Identification

### 3.1 Approach to Determining the Social Locality

Consideration appear to have been given to all others but for the inhabitants of Bendemeer and surrounds.

Tamworth and Armidale to provide goods and services but Bendemeer to absorb all the negatives this project brings to the village.

### 4.1 Community Consultation Undertaken for the EIS

**No community letter box drops – this alone sums up the community consultation** with Bendemeer residents regarding this project.



Bendemeer's residents a lower than average in internet access.

**Current Internet outage affecting Bendemeer as advised by Telstra from 15-30 August, 2023 and during the time when submissions are required putting Bendemeer residents at a further disadvantage in regarding this issue.**

Bendemeer has a high retiree population.

SOS members are still coming across locals who have no idea about the project as not using the internet or social media and do not attend the pub where the BEH has their regular appearances.

**Many have only a mobile phone with which they have tried to read the EIS (no paper copies provided), paper copies available at BEH appearances but readers needed to remain at the BEH site to peruse the 2060 page document.**

**Calls to the help desk have advised "the portal does not like mobile phones so must instead attend a Service NSW office to lodge a submission against this project.**

**The nearest NSW Service Centre is located in Tamworth 40kms south of Bendemeer.**

**This distinctly disadvantages further the disadvantaged who will be impacted by this project.**

**What is the point of community consultation when it is the applicant who is the one to be consulted with? It does not make any sense as the applicant has only the project's success at the heart of any conversation and therefore many Bendemeer residents believed any conversation with the BEH was futile and waste of their time.**

#### Community Survey

Why were nearby communities consulted with regard to the Bendemeer solar project given it sits on top of the Bendemeer village and not elsewhere?

If only 50 respondents were from Bendemeer and 13 not (total 63), why were views of these others taken into account?

How did the 13 from outside of the Bendemeer area affect the outcome of the survey?

Were the 13 located outside of the Bendemeer area for or against the project?

#### Newsletters

How does the applicant determine if a newsletter is read?

How were the newsletters circulated in the Bendemeer community?

#### Community Pop-up Sessions

Held in locations that stand to gain financially from the project proceeding.

#### SA1 Bendemeer Township

Given the Key Occupations and Industries described in the table – how many of the Bendemeer residents in this table will qualify for full time work should the project proceed given their skills?

Obviously the applicant is unable to ascertain a person's skills from the table however, given SOS has researched current available jobs on solar projects of this scale and determined most would need an engineering degree of some description – it does not appear there are many with this skill in Bendemeer at least when the last lot of ABS data was compiled.

#### 5.4 Housing and Accommodation

Bendemeer had no rental properties available at the time the EIS was compiled.

SOS is aware of workers living at the pub due to no other accommodation available.

Any further workforce will disadvantage those already in a precarious situation.

Workers coming to Bendemeer that receive a higher wage than those already here will be able to pay a greater rent than existing locals.

Why are accommodation rooms at the Bendemeer Hotel not included in the accommodation/room listing?

### 5.5 Social Structure and Community Wellbeing

The village of Bendemeer is much closer to the project than 1.8km (more like 1km) repeatedly claimed in the EIS. Bendemeer township continues to the Eastern side of the New England Highway so when providing distance from the Bendemeer Village to the project it is disingenuous to say it is 1.8km and dismiss the very many residential dwellings with inhabitants that are just as important as those in the main street.

Bendemeer has three churches not one, two are operational and one is heritage listed.

Bendemeer also has a petrol station and a cafe.

How is it that a report of Social Infrastructure and Community Wellbeing has not identified the 3 churches in the village or the petrol station?

### 5.6 Access and Connectivity

"Attractions are associated with the natural environment and cultural activities etc," this is what brings tourists not industrial solar complexes and the destruction of the natural environment for monetary gain.

### 5.8 Community Values

**Bendemeer a tight knit community however, this has been altered since the BHE/Metis Energy and Athena along with landholders decided to make Bendemeer an industrial zone.**

**"Community values most strongly resonate with the natural environment, farming, and community and family, with the region's natural landscape, rolling hills and MacDonald River of particular value".**

How can the applicant defend the industrialisation of such a valued landscape as described by the Stakeholder engagement conducted for the project?

The Bendemeer rodeo and campdraft is the largest event held each year and this has been one of the first casualties of this unfortunate project coming to the village with division created by funding offers.

## 6. Social Impact Assessment and Management

One host landowner stands to benefit

Unspecified if any of the local workforce will benefit

Visual amenity and other land use and landscape changed for the worse plus disruptions to residents by construction noise, dust etc.,

Bendemeer's greatest attribute, its landscape will be impacted the greatest.

The environment will be destroyed in the footprint of the facility and surrounds but a few will gain financially.

The future decommissioning of the project and its impacts will be determined in the future – it will be an enormous burden of waste to be disposed of.

### Employment and Procurement

Gillespie Economics state there will be income rising to \$34 million in annual direct and indirect household incoming regionally – so benefit the LGAs of Tamworth, Armidale, Uralla and Walcha for a project imposed only on Bendemeer – how is this fair?

### Accommodation and Worker Influx

The worker influx will be accommodated primarily in other areas – again Bendemeer is being told how it will benefit but the reality is very different. Bendemeer has all the pain but very little gain and only for a few.

### Local Disruptions

Will be many.

Bendemeer will bare the brunt of disruptions due this massive development on the village doorstep.

## Land Use and Landscape

It is correct that the cities require the rural areas to support their lifestyle by generating energy they do not or cannot themselves. Only 17% of the affluent areas in Sydney have solar on their homes.

How is it possible that the Bendemeer CBF will assist property devaluation due to the project?  
An indepth explanation of this particular issue is of utmost importance to SOS.

### Table 6-8 Operation Phase: Land Use and Landcsape Impacts

How is it possible that the neighbouring properties in a rural environment to a large scale industrial solar complex will be “unlikely” to be impacted negatively regarding property value?

What study of a very similar area can the applicant put forward as evidence of the “unlikely” rating that property prices will be negatively impacted by this unattractive industrlian development?

## Stakeholder and Community

What evidence does the applicant provide to prove to Bendemeer residents that their are no health concerns they should have with regard to the close proximity to their homes of the substation and BESS?

Many in the community have complained of mental health issues and stress related to the fear and worry of this large scale development in their quiet rural community and the negative impacts it will have on their collective and individual circumstances going forward.

### Table 6-9 Operations Phase: Stakeholder and Community Impacts

Community Benefit Fund will and is contributing to social upheaval in Bendemeer.

Repeated throughout conversations regarding this project and information regarding survey outcomes those for and against – it is always the monetary gain that is the dividing factor.

Those who put monetary gain above all and those who value other things like the environment.

### 6.2.3 Cumulative Impacts

The response to the stakeholder concerns regards cumulative impacts and the 8GW of energy forced upon the NE REZ almost 3 times the others is incorrect and does not show that the applicant in any way understands the location of Bendemeer in relation to the other projects and there is only one highway in and out to all these projects and that is through Bendemeer.

How does the applicant come to the conclusion that Bendemeer is “relatively isolated”.

SOS suggests the applicant re-visit the cumulative impacts that 8GW of solar and wind will have on Bendemeer. Apart from the various solar projects of which this is not every project in the NE REZ listed below, there are also numerous wind projects Bendemeer being one .

- Salisbury solar - 10km from Uralla
- New England Solar – 6kms from Uralla
- Middlebrook Solar – 22kms from Tamworth
- Tamworth Solar – 25kms from Tamworth
- Oxley Solar – 12kms from Armidale
- Tilbuster Solar – 6kms from Tilbuster
- Metz Solar – 15kkms from Armidale

The applicant does need to study the NE REZ to get a better understanding and appreciation of the amount of large scale renewable projects in a small area where again we advise the New England Highway is the only way in and out to these projects.

This cumulative impact is most certainly a great cause for concern within the social locality. For the applicant to be unaware of the scale and number of projects that will also affect Bendemeer does not show social licence or any concern for the area it has targeted with its solar and wind projects. The cumulative impact of solar, wind and powerlines on Bendemeer alone is bad enough and should not be allowed to proceed.

**This submission against the Bendemeer Solar Farm has been prepared and submitted for and on behalf of Save Our Scenery Bendemeer Action Group.**