Objection to Sandy Creek Solar Farm (SSD-41287735)

I whole heartedly object to the Sandy Creek Solar project.

I am a fifth generation farmer in the tightly held, "safe" Dunedoo district; my family has been farming in the area for over 200 years. My partner and I, with help and support from my retired but still very active parents, produce beef, lamb, wool and grain on part of my family's original land. Whilst some of the farming land in the 20,000 square kilometre Central West Orana Renewable Energy Zone is not considered valuable, it all plays its part in producing the food and fibre Australia relies so heavily on. To see this land scarred by transmission lines and covered in wind turbines and solar panels will destroy our picturesque region, its small, rural communities, and decimate the agriculture sector in our magnificent country.
Although we, personally, are not currently being forced to directly neighbour renewable energy infrastructure projects, we will be adversely impacted by the increased traffic on the Golden Highway (a major transport route for the CWO REZ), which runs through the middle of our property, impacts on the Talbragar River system and underground aquifers, loss of visual amenity, increased bushfire risk and fire fighting restrictions, potential insurance premium increases and loss of community cohesion.

<u>Legislation & CWO REZ Declaration</u>
The Electricity Infrastructure Investment Act 2020 was passed through the NSW Parliament, during the height of Covid 19. One of the objects of the Act is "to foster local community support for investment in new generation, storage, network and related infrastructure". The Act also states that "a person or body exercising a function under this Act must do so in a way that is consistent with the objects of this Act." I do not believe any renewable energy developer or government authority has fostered local community support within the CWO REZ.
The Act also states that "the Minister may make a declaration" of a renewable energy zone "only if the Minister has considered the following" – "the views of the local community in the renewable energy zone".
Lightsource BP's Sandy Creek Solar project is one of over fifty projects operating, under construction and proposed within the CWO REZ boundary at this point; it is certain there are more projects early in the planning stages and developers continue to prospect for more potential land hosts. The CWO REZ declaration came as a shock to the vast majority of its inhabitants. Not unlike specific projects being proposed by developers now, community engagement regarding the REZ was lacklustre, or even non existent. Below are answers given to supplementary questions at the 2024 Budget Estimates hearings in the NSW Parliament evidencing the lack of community knowledge about the CWO REZ prior to its declaration.

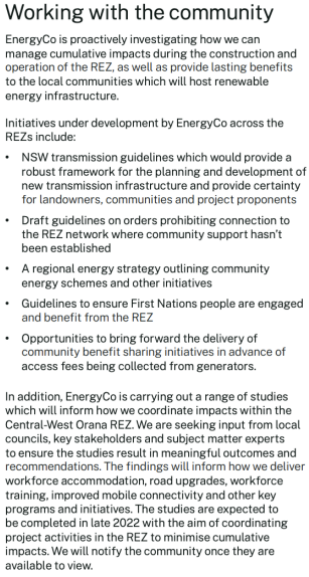
(a)	In accordance with the Minister's statutory obligations under section 20(e) of the *Electricity Infrastructure Investment Act 2020*, the Central-West Orana Renewable Energy Zone (REZ) draft declaration was exhibited on the former Department of Planning, Industry and Environment's website for public consultation for 28 days from 17 September 2021 to 15 October 2021.
(b)	Six submissions were received from stakeholders during the draft consultation period. All submissions were in support of the exhibited draft (three from renewable energy developers, two from public authorities, and one from an organisation). No submissions were received from members of the general public, and no objections were received from any stakeholders.

(c)	Submissions were provided on the grounds that they would be confidential. Submissions will not be published.
(d)	Consistent with the Minister for Energy's statutory obligations under section 19(4)(b)(iii) of the *Electricity Infrastructure Investment Act 2020*, the declaration was made in consideration of the views of the local community in the REZ. This included through landowner meetings, direct engagement with local councils, mailouts, and establishment of a Central-West Orana REZ Regional Reference Group with local community representatives. The proposed scale and scope of the Central-West Orana REZ identified in the declaration had been publicly available since the NSW Government's submission on AEMO's Integrated System Plan in March 2018.
(e)	The former Department of Planning, Industry and Environment advised the Minister at the time that the declaration could be made consistent with statutory obligations under the *Electricity Infrastructure Investment Act 2020*, including that views of the local community in the REZ had been considered and that the draft had been published for 28 days on the Department's website.

<u>Social license</u>

According to the Parliament of Australia "social license to operate has been defined as an ongoing acceptance of a project by the community and other important stakeholders." How is social license measured by DPHI? Does a certain number or percentage of objections to a project EIS suggest social license has not been achieved, therefore rendering said project unapprovable?

The below is an excerpt from the EnergyCo September 2022 project update. It states that an initiative under development by EnergyCo across the REZ's is "draft guidelines on orders prohibiting connection to the REZ network where community support has not been established".



Working with the community

EnergyCo is proactively investigating how we can manage cumulative impacts during the construction and operation of the REZ, as well as provide lasting benefits to the local communities which will host renewable energy infrastructure.

Initiatives under development by EnergyCo across the REZs include:

- NSW transmission guidelines which would provide a robust framework for the planning and development of new transmission infrastructure and provide certainty for landowners, communities and project proponents
- Draft guidelines on orders prohibiting connection to the REZ network where community support hasn't been established
- A regional energy strategy outlining community energy schemes and other initiatives
- Guidelines to ensure First Nations people are engaged and benefit from the REZ
- Opportunities to bring forward the delivery of community benefit sharing initiatives in advance of access fees being collected from generators.

In addition, EnergyCo is carrying out a range of studies which will inform how we coordinate impacts within the Central-West Orana REZ. We are seeking input from local councils, key stakeholders and subject matter experts to ensure the studies result in meaningful outcomes and recommendations. The findings will inform how we deliver workforce accommodation, road upgrades, workforce training, improved mobile connectivity and other key programs and initiatives. The studies are expected to be completed in late 2022 with the aim of coordinating project activities in the REZ to minimise cumulative impacts. We will notify the community once they are available to view.

EIS Appendix R page & statement	**Response/Concern**
Page 66 Table 5.3 Most landholders stated they did not support the Sandy Creek Solar Farm, primarily based on direct impacts including local amenity (ie visual) and land-use	Indicates the general feeling of people in the district toward the Sandy Creek Solar project – distinct lack of social license!

Community Engagement

EIS Appendix R page & statement	Response/Concern
Page 82 Stakeholder participation in decision-making systems refers to the right of those who are affected by a decision to be involved in the decision-making process, and that decision-making processes actively identify and seek input from affected stakeholders (IAP2, 2015).	Table 5.3 Adjacent and nearby landowners – summary of engagement feedback states "some landowners expressed a desire for more meaningful and direct engagement with LSbp regarding their key concerns". Table 5.6 Local community SIA engagement outcomes – summary states "concerns about lack of meaningful community engagement and feeling unheard". The Australian Energy Infrastructure Commissioner, throughout the Community Engagement Review consultation, held over 75 meetings with representative stakeholders, landowners and community groups and received 250 online survey responses and over 500 written submissions. It found that 92% of respondents were dissatisfied with the extent to which project developers engaged the local community and 89% of respondents stated that the information they received from project developers was not relevant to the concerns that they raised. The Community Impact Survey, conducted by Property Rights Australia and NREN, collecting 775 responses between Saturday 12th April and Friday 10th May 2024. An overwhelming 93% of respondents believe that the government has not acted in good faith rolling out renewable energy projects – nearly all feel that government departments have failed to conduct open and transparent consultations, and an even larger portion say their concerns have been completely ignored. 76% of respondents reported feeling pressured by energy companies to allow access to their private properties and a tiny 3% believe that the developers have acted with integrity. The results from these two consultations highlight the major issues within the renewable energy sector regarding community engagement!
Page 83 LSbp will continue to engage stakeholders through EIS exhibition and subsequent phases of the assessment, including ongoing negotiations and consultation with local Council, neighbouring landowners, and First Nations stakeholders.	I am not aware of any community engagement events open to the general public by Lightsource BP throughout the EIS exhibition period (May to 25th June 2024

Agriculture

EIS Main report page & statement	Response/Concern
Page ES.9 If fully removed from agricultural land use, the study area would account for 0.27% and 0.19% of the agricultural land in the Dubbo and Warrumbungle LGAs being removed, respectively, which is insignificant.	The Cambridge online dictionary defines insignificant as being "small or not noticeable, and therefore not considered important". I do not believe significance is a quantifiable measure of impacts. I also do not believe considering fully removing any valuable agricultural land from production will not be noticed or important. These calculations do also not allow for the cumulative effect of the proposed removal of agricultural land within the CWO REZ and more specifically the Dubbo and Warrumbungle LGA's. It is also worth noting the location of the cluster of projects currently operating, under construction and proposed, further condensing the impacts on specific agricultural areas – areas renowned for their production ability.
Page ES.9 Overall, potential Project impacts to soil resources and agricultural activity during construction and operation are considered minor and can be adequately managed through the implementation of mitigation measures.	Potential impacts to soil resources and agricultural activity will be high. Installing solar panels on the project site will mean the current agricultural uses, cattle grazing and cropping, will not be possible. How will Lightsource BP keep the soil healthy and productive during construction and operation? How will compaction issues be managed?
Page 154 BSAL is NSW's most valuable farmland with high quality soil and water resources which render the land capable of sustaining high levels of agricultural productivity with minimal management practices (OEH 2013). There is a small area of mapped BSAL present in the central-southern section of the western portion of the study area, associated with the Mebul soil landscape (Figure 6.6).	No renewable energy infrastructure project should impact Biophysical Strategic Agricultural Land (BSAL) due to it being NSW's most valuable farmland.
Page 154 SSAL contains high quality soil and water resources. The mapping program will assist state and local governments to recognise and value agricultural land. The study area is almost entirely mapped as potential SSAL.	From the Department of Primary Industries website "Agriculture remains central to NSW's food security and economic prosperity. However, the amount of rural land suitable for high levels of agricultural production in NSW is limited. Agricultural mapping therefore plays an important role in identifying and helping preserve this valuable resource." Renewable energy infrastructure should not impact any potential State Significant Agricultural Land (SSAL).
Page 158 Once the Project reaches the end of its investment and operational life, Project infrastructure will be decommissioned and the study area returned to its pre-existing land use, namely suitable for grazing and cropping, or	What is the definition of investment life? Returning the study area to its current use of grazing will take decades. Trees for livestock

another land use as agreed by the Project owner and the landholder at that time. Therefore, the risk of permanently removing agricultural land or industries is negligible.	shade and shelter will take at least 20 years to mature for the desired use. With regard to land being used for cropping after a minimum of 40 years out of production, the inputs (fertiliser, tilling to release compaction etc) will be enormous to grow a worthwhile crop.
Page 158 If fully removed from agriculture for the life of the Project, the loss of study area agricultural land within Dubbo and Warrumbungle LGAs is insignificant relative to the stock of agricultural land in the region.	What is "the stock of the agricultural land"? Is this suggesting there is a reservoir of land available for agriculture yet to be brought into production? Does this account for the productivity of the land for the proposed project compared to other areas within the LGA's?
Page 252 However, it is acknowledged within the Solar guidelines that: "cumulative risk to agricultural land and productivity because of large -scale solar development is very low. The Australian Energy Market Operator estimates that NSW will need approximately 20,000 MW of large-scale solar generation by 2050. This would require approximately 40,000 ha of land or only 0.06% of rural land in NSW. Even in the highly unlikely scenario that all of NSW's solar generation were located on important agricultural land (this land covers around 13.8% of the state and is 6 to 7 times more agriculturally productive than the remaining 86.2% of the state) only 0.4% of this land would be required."	The Department of Planning, Housing and Infrastructure has previously acknowledged that transforming land from its traditional use of agriculture to the industrial nature of a solar installation is a "loss" of agricultural land. However, the Department considers the amount of land lost to solar in the CWO REZ will result in a "negligible reduction in the overall productivity of the region." Whilst there is 2 million hectares of land within the CWO REZ boundary and the loss of nearly 16,000ha to solar projects accounts for approximately 1% of agricultural land, when you condense the area to a 30km radius of Birriwa (where there are many projects currently proposed, under construction and operating) the loss of agricultural productivity is much more intense. 30km radius of Birriwa = 282,700 hectares (including non agricultural land) Land lost to solar within 30km radius of Birriwa = nearly 11,000ha 11,000ha out of 282,700ha = 3.9% The Department of Primary Industries Agriculture Industry Snapshot for Planning August 2020 states "the Central West Slopes and Plains has the advantage of large areas of unfragmented land that allow the achievement of economies of scale for broadacre agriculture including irrigation. This coupled with suitable soils and water supply, infrastructure as well as access to markets in Dubbo, Orange, Sydney, and Newcastle make the Sub Region **one of the most successful and profitable in NSW**." The same document also says "future land use planning must recognise the importance of agriculture to society and the economy and that the land and resources on which agriculture depend need to be protected and managed to enable continued

	use of the land for agriculture" and, "land use planning needs to recognise that it is not only agricultural land with excellent biophysical characteristics that needs to be retained for agricultural purposes, but also those key secondary supporting industries which may be located on lower quality agricultural land which are still potentially impacted by encroaching non-agricultural land uses." The same document declares there is a "need to protect land for its future productive capacity particularly where there is a combination of biophysical assets such as water, topography and soils. The Central West Slopes and Plains Sub Region supports high value agriculture now and will be important to sustain production of more specialised agricultural and horticultural enterprises into the future."
EIS Appendix K page & statement	**Response/Concern**
Page 32 The modelled LSC and inherent soil fertility indicate the area is consistently valuable agricultural land.	Valuable agricultural land is an important resource for producing food and fibre for Australians and should not be used for energy generation projects or Battery Energy Storage Systems.
Page 41 It is estimated that the study area ran some 400–475 head of trade steers and 75 cows with calves at target stocking rates of 4 dry sheep equivalent per hectare (DSE/ha) rising to 16 DSE/ha on fallow crop and 2 DSE/ha on native pasture. **Page 109** This productivity will be lost as the Project will result in the land being unavailable for the existing cropping and cattle grazing practices. This is a significant loss of agricultural land value based on annual productivity and an assumption of the entire study area being developed and unavailable for intensive agriculture such as cropping or cattle grazing.	One 500kg (liveweight) steer will produce 2750 average daily red meat intakes (100g). The development footprint for Lightsource BP's Sandy Creek Solar is 1,489ha. Whilst there are some exceptions, this amount of land within the Central West Orana Region is capable of producing enough red meat - beef, lamb and/or mutton, to feed 1,600 Australians per day, based on the 100g average daily red meat intake (when considering a mixed farming operation with self replacing cattle and sheep flocks). That's 584,000 Australian red meat intakes in a year produced from the land potentially being lost to the Birriwa Solar project. The same land is capable of growing enough wool to produce 34,000 pure wool jumpers each year; imagine how many socks or wool blend garments that would be. Over the whole CWO REZ that's more than 6 million average Australian daily red meat intakes or 360,000 pure wool jumpers lost per year.
Page 110 The compatibility of the Project with adjacent land-uses based on zoning as primary production (e.g. agriculture, renewable energy farms) during operation and after decommissioning is expected to be good with	According to the NSW Government, "a primary producer is a person or incorporated body who cultivates or uses their own or someone else's land for their own benefit:

the utilisation of mitigation measures in Section 8.	• for the production of fruit, grains, flowers, vegetables, tobacco or farm or agricultural produce of any description • for dairy farming, poultry or other bird farming, pig farming, bee keeping, or oyster or fish culture • for a nursery • as a pastoralist for the rearing or grazing of horses, cattle or sheep • who gather leaves from which eucalyptus or other oil is to be distilled." Renewable energy infrastructure projects ARE NOT primary production nor compatible with adjacent land uses due to potential impacts discussed throughout this document.

Bushfire Risk & Fire Fighting Limitations

EIS Main report page & statement	**Response/Concern**
Page ES.12 Emergency services capability will be supported by ensuring access and water volumes are maintained for any bushfire emergency response.	Lightsource BP should be responsible for emergency services required for the Sandy Creek Solar project not put pressure on existing, stretched, emergency services.
Page 221 The area where the temporary workforce accommodation facility is proposed is mapped as bushfire prone and could potentially be exposed to a bushfire threat. Increased resident densities on existing bushfire prone lots may heighten the level of risk to occupants.	Sandy Creek Solar accommodation facility should not be permitted if it is deemed to "heighten the level of risk to occupants".
Page 222 The accommodation facility will have a static water and hydrant supply, complying with the following recommendations of PBP: • a minimum 50,000L static water supply (above ground storage steel or concrete tank) • connections suitable for firefighting purposes located within the workforce accommodation facility, being 65 mm Storz outlets • fire hydrant, spacing, design and sizing complies with the relevant clauses of Australian Standard AS 2419.1:2021 • fire hydrant flows and pressures comply with the relevant clauses of AS 2419.1:2021 • a fire hose reel system be constructed in accordance with AS/NZS 1221:1997, and installed in accordance with the relevant clauses of AS 2441:2005 • unobstructed access to water supply points at all times • all above-ground water service pipes are metal, including and up to any taps.	With regard to the recommended capacity of a water tank on site - a 38mm fire fighting nozzle is capable of expelling 280L/minute meaning 50,000L of water would be used in under 3 hours. During most grass or bushfires there are numerous fire fighting trucks and trailers, often owned by private landowners used in an attempt to extinguish the fire in a timely manner for the obvious reasons of there being less damage caused. An average call out for RFS members and local landowners would see at least half a dozen vehicles/trucks attend – six 38mm nozzles would use 50,000L in under 30 minutes. It would be nice to think you could have a fire blacked out in that time but it is simply not reality. 50,000L is not enough water to adequately fight even the smallest of fires in rural NSW, and certainly not enough water to adequately protect 350 workers and an accommodation camp.

	Lightsource BP should be responsible for protecting the accommodation camp with two RFS category 1 equivalent fire trucks, manned by employees/contractors, to alleviate any impacts on local emergency services.
EIS Appendix Q page & statement	**Response/Concern**
Page 23 Bushfire fuel management can be achieved by frequent slashing mowing, chemical application, and ongoing agricultural practices such as grazing intensities. The targeted grassland structure within the PV array will be the same as for the APZ, with a nominal target of maximum 10cm grass height.	Considering solar factories generate "green energy", will the grass be slashed by an electric tractor negating the need for the burning of diesel?
Page 24 A dedicated static water supply for bush firefighting purposes should be provided at strategic locations within and around the solar farm, having consideration for essential equipment and accessibility (e.g., near the main entrance). A minimum 20,000L capacity steel tank supply for the solar farm would provide nominal emergency water supplies, however, the Project has capacity to provide a larger, community focussed emergency water supply (example provided Plate 2).	How many fire fighting tanks would be strategically located around the project? A 38mm nozzle would use 20,000L in 71 minutes. A bushfire requires many fire fighting units meaning 20,000L would not last long enough to be of use during a fire emergency. Where would the larger, community focussed emergency water supply be sourced?
Attachment 3 Page 2 Increased resident densities of existing lots that are bush fire prone may heighten the level of risk to the occupants. The presence of additional dwellings can impact on the evacuation and sheltering of residents during a bush fire. **Attachment 3 Page 8** Emergency management planning for the temporary workforce accommodation facility will provide suitable emergency and evacuation arrangements for occupants of the temporary workforce accommodation facility.	How does Lightsource BP propose to protect local landowners and residents during a bushfire? Where will the Sandy Creek Solar project workforce be evacuated to during a bushfire emergency? How will they be safely evacuated without impeding local landowners? Will Lightsource BP employees be moved off site during high fire danger periods? Where will they be evacuated to?
EIS Appendix L page & statement	**Response/Concern**
Page 45 From the hills within the development footprint, wooded ridgelines are visible beyond the Project boundary. To the east of the Project is a ridgeline within the Tuckland State Forest. South of the Project is Dapper Nature Reserve. And north of the Project is Cobbora State Conservation Area.	The risk of any fire originating from the solar project entering State Forest, Nature Reserve or Conservation Area and becoming uncontainable (ravaging habitat and wildlife) should be recognized. How does Lightsource BP plan to adequately protect other land from the risk of bushfire originating from the solar project?
EIS Appendix R page & statement	**Response/Concern**
Page 59 There is a Rural Fire Brigade (RFB) shed adjacent to the Project site, located at 1006 Spring Ridge Road, Dunedoo. As reported during SIA engagement, this shed is operated by	Has Lightsource BP consulted with the local volunteer fire fighters, who man the shed adjacent to the project? Do those men and women, who voluntarily risk their lives to protect local homes, businesses and environment, have

volunteer firefighters who live in the local community (see Section 5.3.1).	concerns about the risks associated with the proposed project? Are they willing to fight a fire within the solar project site?

Roads, Traffic & Transport

EIS Main report page & statement	**Response/Concern**
Page 58 The Project's construction traffic volumes are expected to have a minimal impact on the Golden Highway.	What constitutes minimal impact? Will Lightsource BP be responsible for any local residents injured in vehicular accidents involving its employees/contractors?
Page 191 With the implementation of the mitigation measures presented in Table 6.3, the road network is expected to operate at a safe and acceptable level.	Safe and acceptable to the local community, who will be most heavily impacted, or as per guidelines?
EIS Appendix L page & statement	**Response/Concern**
Page 15 Internal access roads will be constructed to facilitate access to the remainder of the development footprint. Internal access roads will be approximately 4 m to 6 m in wide. An internal perimeter access road will be located around the perimeter (where feasible) of the development footprint and will form part of a 10 m asset protection zone that will surround the site infrastructure. One public road crossing will be utilised on Sandy Creek Road to allow Project-related vehicles to move across the public road corridor and between parcels of land that form part of the development footprint.	How will internal access roads be rehabilitated at the end of the project life?
EIS Appendix R page & statement	**Response/Concern**
Page 61 Significantly, a common theme emerging from SIA engagement was the condition of the roads within Dubbo Regional LGA and Warrumbungle Shire LGA. This includes a number of major roads, including the Golden Highway, where there is a high level of flood damage and potholes, where road accidents are reportedly common.	Local roads are in a state of disrepair for a number of reasons – under resourced LGA's, incomplete works, increased traffic including heavy vehicles and wet weather. Road user safety will be a major issue on the Golden Highway in particular considering the amount of traffic.
EIS Appendix N page & statement	**Response/Concern**
Page 51 If no on-site accommodation facility is provided, daily traffic during the peak construction month is expected to reach 60 light vehicles, 20 shuttle buses and 37 heavy vehicle movements, for a total of 117 daily vehicles (234 daily vehicle movements). However, if an on-site accommodation facility is provided during the peak construction periods, the total daily traffic movements by all vehicles will be reduced by 50% approximately to 59 daily vehicles (118 daily vehicle movements).	The predicted 118 daily vehicle movements, or worst case 234 vehicle movements, is, although not according to traffic data calculations, a huge increase in traffic for the local area. This will turn quiet, local roads into heavily trafficked transport routes. This will be an enormous impact to local residents.

Water Sources

EIS Main report page & statement	Response/Concern
Page 60 The estimated water demand for construction of the Project is approximately 70 megalitres (ML) per year (ML/year), or 165 ML over the 22-28 month construction period. The majority of this water will be required for dust suppression, with other minor uses including site amenities, fire protection, and washing of construction equipment and plant. During construction of the Project, non-potable water will be sourced via multiple groundwater bores including some existing licensed bores on the property. Additional bores are yet to be constructed but will be located within the development footprint, targeting the regional porous rock aquifer.	Has Lightsource BP been given permission to utilise the groundwater bores on the property? Are these stock and domestic bores? How many additional bores is Lightsource BP considering? Will Lightsource BP be forced to cease using water if the water level of other bores in the district begin to drop? Livestock water is essential for the agricultural industry.
Page 199 It is proposed to also source water opportunistically during construction and operation from existing landholder dams in accordance with harvestable rights, to further minimise demand for imported water. Licensing of water will not be required provided the total volume of dams used for such purposes is within the maximum harvestable right dam calculator (MHRDC), and otherwise comply with the applicable harvestable rights order.	Will this water use impact the water sources for sheep intended to graze under the solar panels?

Surface Water & Run Off

EIS Main report page & statement	Response/Concern
Page 201 The primary risk to groundwater quality during construction is accidental spillage of wastewater, fuel or other hazardous materials used to support site activities that may infiltrate through soils to groundwater. The study area includes mapped zones of groundwater vulnerability (DLWC 2001).	Groundwater vulnerable zones should be protected!
EIS Appendix L page & statement	**Response/Concern**
Page 16 The site is anticipated to be subject to minor overland flooding, as well as more concentrated flows along Sandy Creek, Broken Leg Creek, Spring Creek, and smaller unnamed drainage lines that traverse the site.	The creeks in the study area have been known to rise very quickly during periods of intense rain and move enormous amounts of water. Any disturbance could cause adverse impacts over the whole site and further down stream, into the Talbragar River.

Visual Impact & Noise

EIS Appendix L page & statement	Response/Concern
Page 48 No significant scenic vistas have been identified as having potential to be impacted by the Project.	Who classifies significant scenic vistas? Is it the people who value aforementioned vistas, or

	those assessing project impacts, employed by the developer?
Page 79 It should be noted that people living near the Project area value views of the landscape. It may therefore be detrimental to install plants to screen the view of the Project infrastructure, which will also block views of the landscape. Care must be taken when proposing landscape screening that may create other adverse effects. It is therefore recommended that any landscape screening be done in consultation with the landowners and/or people affected by the Project.	I am confused as to why it is detrimental to install plants to screen the view of a solar factory because people living near the project value views of the landscape, yet the solar panels themselves are not considered a blight on the landscape. Has Lightsource BP asked those who will have views of the project their opinion regarding the change of landscape to an industrial installation?
Page 83 Construction impacts are considered temporary, and therefore are not considered to need any mitigation or screening treatment.	What timeframe is considered permanent? I do not believe two years is temporary.
Annexure A Viewpoint 15 No mitigation is required due to the low visual impact rating. Distance to development 730m. (see photomontage below)	I do not believe this view can be classified as low impact. The solar panels are proposed 730 metres from the residence and will be prominent in the view.

Inset 10: Full-size 50mm image of the area with highest visual impact

Note: the full-size 50mm image used for this image provides a 40° horizontal field-of-view.

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Landscape Plan

EIS Appendix L Annexure B	**Response/Concern**
Plant Schedule: Tubestock	Whilst I acknowledge tubestock is the most cost effective and successful way to plant trees and shrubs a lot of the tree species suggested are very slow growing. When does Lightsource BP expect the visual screening will be effective?
Planting shall commence as soon as practicable and where applicable upon completion of initial site works.	What stage is “as soon as practicable”? Prior to, during, or post construction?
Monitoring is likely to be required: • Monthly for the first 6 months, • Once every 3 months for the following 18 months, • Subsequent years if required. Frequency to be discussed.	What time of year will planting take place? If planting is carried out during the warmer months tubestock trees and shrubs will need watering more often than once a month. I note the contract for landscaping is 24 months. What will happen thereafter?

Heritage

EIS Appendix L page & statement	Response/Concern
Page 42 As outlined in the Statement of Heritage Impact (EMM 2023c), there will be impacts to heritage values in the development footprint as a result of the construction and operation of the Sandy Creek Solar Farm, and the associated transmission and road infrastructure. There will be a minor loss of significance of the existing rural agricultural and pastoral landscape, which consists of cleared fields, paddocks, fences, and archaeological sites. The current aesthetic of the valley, cut through by a creek, which is one that is recognisable from its early historical phase, will be changed to industrial and utility-oriented landscape.	Many people live rurally due to the large open spaces and scenic vistas – they are very valuable to the local community. The change to an industrial and utility-oriented landscape is a major loss and extremely significant to people who have lived in the area for generations. Rural landscapes are also a tourist attraction. Will there be any attraction left in the area for travellers to visit?
Page 42 Overall, impacts to historical cultural values are not predicted to be significant, and where loss of value occurs, it can be recorded and mitigated using accepted methods.	Agriculture, the local community and the generations of farmers that came before us are considered historic cultural values to the majority of community members in rural Australia. The loss of valuable agricultural land and community cohesion due to manipulative tactics being used by developers to divide and conquer landowners cannot be mitigated and will be significant to the local community. Agricultural businesses provide income to small businesses within rural towns, keeping them alive. The loss of community cohesion is, and will continue to, affect organisations within the district that rely on volunteers – this is how rural communities survive.

Telecommunications

EIS Main report page & statement	Response/Concern
Page 60 Telecommunication utilities are not available at the Project site. As such, the cellular network will be used during construction. During operations, connection to telecommunications will be via optical fibre expected to be installed along transmission lines, with cellular backup.	The cellular network in the local area is struggling to service the current population. The influx of CWO REZ workers will significantly decrease the capacity of the network putting locals at risk of not being able to contact emergency services. What does Lightsource BP propose to ensure the local community is not without adequate cellular network coverage?

Electricity Use

EIS Main report page & statement	Response/Concern
Page 60 Access to electricity during construction will be via the local distribution network, backed up by diesel generation where required.	Coal fired power and diesel generation used to construct a renewable energy installation – is that “green energy”?
EIS Appendix Q page & statement	**Response/Concern**

Attachment 3 Page 8 It is estimated that the temporary workforce accommodation facility will require 2.6 - 2.8 kWh of electricity per person per day. Electricity will be generated on-site using solar panels and batteries.	How many kW of solar panels and kWh of battery storage will be installed to service the accommodation facility during construction? Will that be installed prior to any other construction activities? Will there be onsite storage of diesel? If so, where is the proposed storage site and how many litres?

Workforce

EIS Appendix R page & statement	Response/Concern
Page 85 Based on an average construction workforce of 245 workers, it is assumed that at about 49 workers (20% of average workforce numbers) would be sourced from the surrounding area which includes Dubbo, Wellington, and Gulgong.	Considering the number of other renewable energy projects is it realistic to expect to find 49 workers without employment within the study area?
Page 116 It is proposed that the Project encourage operation workers to contribute to the local community through volunteerism or other initiatives.	Does this suggest construction workers will not contribute to the local community?
Page 116 The implementation of comprehensive Community Engagement Plan and Worker Code of Conduct could mitigate perceived privacy and public safety risk. Further, the Project could coordinate with community services such as police and emergency services to familiarise relevant services with the Project in case of an incident.	How, specifically, will the Community Engagement Plan and Worker Code of conduct mitigate perceived privacy and public safety risk? What sort of incident does Lightsource BP consider possible? Can Lightsource BP guarantee the safety of local community members?

Social Impacts

EIS Appendix R page & statement	Response/Concern
Page 59 Within Warrumbungle Shire LGA, sparse resources and geographic isolation are key challenges, meaning hard and soft social infrastructure, such as community services and civil infrastructure, require strategic coordination across the LGA to meet resident's needs. An ageing population is another key challenge for Warrumbungle Shire LGA, requiring planning for an increasing demand for support services.	Warrumbungle Shire Council (WSC) is under resourced, not just financially, meaning community services and facilities struggle to be adequately maintained. An increased demand in support services will severely impede WSC's ability to provide rate payers with the services required. WSC will not benefit from the financial contributions made through the voluntary planning agreement with Lightsource BP without a strategy to employ and retain staff with the capacity to utilise the substantial funds in a way that will be beneficial to local communities and rate payers.
Page 59 SIA engagement found that access to general practitioner (GP) and other health services has become increasingly more difficult in	Access to health services in rural and regional NSW has been lacking for decades but has escalated rapidly in the last 10 years. Any

the regional area, with longer wait times (see Section 5.3). **Page 60** Further, Warrumbungle Shire LGA demonstrates constraints in the availability of GPs and health professionals, with about half the rate of GPs and a quarter the rate of health professionals available compared to NSW	increase in population will further exacerbate this situation causing more issues for the local community with regard to access to health services. How does Lightsource BP plan to address the needs of the workforce, and operational staff, for the Sandy Creek Solar project when considering the lack of GP's and health professionals within rural NSW, more specifically the Warrumbungle LGA?
Page 59 Within the local study area, there is 1 police station, 1 ambulance station, 1 fire and rescue station, 3 rural fire service brigades, and 1 State and Emergency Service (SES) location. The emergency services in the local study area are primarily located in Dunedoo. While Dunedoo has a police station, it is not staffed 24-hours (see Section 5.3).	Emergency services are stretched within rural NSW. The local police officer is, when on duty, often tasked with patrolling a large area, meaning Dunedoo is often without a constable in the township. The Fire and Rescue brigade is made up of mostly locals who work full time, and while they are paid for call outs, most do it as a service to their community. The RFS brigades and SES are made up entirely of volunteers. How will Lightsource BP contribute to bolstering emergency services personnel (mainly volunteers) within the local area?
Page 62 Furthermore, management of mental health conditions can be impacted by the ability to access mental health services. As indicated in Section 4.9.2, access to GP and other health services is constrained in the Dubbo Regional LGA.	The "rapid transition to renewable energy" is contributing to mental ILL health within the CWO REZ. Stress attributed to operating, under construction and proposed projects is affecting local landowners and community members, their ability to socialise with others and successfully run their businesses. From falling out with neighbours over renewable energy projects and family disputes to lack of sleep due to worry, research and submission writing etc, and concern over compulsory acquisition for transmission projects, and everything in between. Landowners within the CWO REZ have been calling on EnergyCo to assist with mental health services for more than 8 months without success.
Page 62 Volunteering rates can give an indication of social cohesion in a community, and the willingness of people to help each other. Rates of volunteering work within the local study area (24.2%) was significantly high compared to the nearby regional communities (13.3%), the regional study area (15.3%), area of reference (15.6%), and NSW (13.0%). Goolma and Dunedoo have the highest rates of volunteering in the social locality (29.3% and 24.7% respectively).	Small rural communities rely on volunteers to thrive and prosper. I believe the rates of volunteering in these communities will drop significantly due to the loss of social cohesion attributable to conflicts regarding renewable energy projects like Sandy Creek Solar. The majority of community events, ie. the Dunedoo Show, Art Unlimited, Tunes on the Turf, would not happen without the enormous efforts made by community focussed volunteers. Renewable energy developers have been donating large sums of money to local events causing some generous local benefactors to withdraw their support.

	Small towns need 'boots on the ground' support, not large amounts of money thrown at events. Who will be left to do the manual labour when the money dries up in years to come?
Page 116 The accommodation facility will host up to 350 workers at any one time, meaning the local area will experience a very large increase in population over the 28 month construction period. This population increase has the potential to change the character of the local area, which may lead to impacts such as changed community identity and reduced social cohesion.	Many people reside in rural areas due to the character of the area and sense of community. Will small towns saddled with numerous renewable energy developments lose valuable contributing community members and generational inhabitants due to these projects?
Page 117 As discussed in Section 6.2.2iii, up to 5,000 construction workers are required for projects in the surrounding area. This is likely to have considerable impacts to the local population composition and may have implications to the general feeling of safety, wellbeing, and local identity amongst existing residents.	If, as shown on page 116, 350 workers for the Sandy Creek Solar project alone is categorized as a "very large increase in population", what describes the potential 5,000 workers in the surrounding area? Is it acceptable that those areas unfortunate enough to have been declared Renewable Energy Zones must face negative impacts to their general feeling of safety, wellbeing and local identity whilst those in major cities benefit from "green energy" without the consequences?

<u>Accommodation</u>

EIS Appendix R page & statement	**Response/Concern**
Page 91 LSbp acknowledges the capacity limitations in short-term accommodation across the regional area. While LSbp will utilise the accommodation facility for most workers, some will require accommodation nearby. This includes Project personnel who may not wish to use the accommodation facility or during peak workforce periods where the accommodation facility cannot accommodate all workers required.	How will Lightsource BP ensure workers from the Sandy Creek Solar project, not accommodated in the TWA, will not adversely impact the accommodation requirements local residents, tourism or labour force required for other industries?

<u>Community Benefit Sharing</u>

EIS Main report page & statement	**Response/Concern**
Page 99 LSbp is proposing to enter into a voluntary planning agreement (VPA) with Warrumbungle Shire and Dubbo Regional Councils. LSbp will contribute to community enhancement, training, and education through the REZ access fees to a sum of $2,300 per MW per year, or $1.61 million per year.	The proposed sum to be contributed by Lightsource BP to the two affected councils is substantial, however, without the capacity to utilise the funds or manage potential projects, will it be a complete waste? How does Lightsource BP propose to ensure the financial contributions they propose are for the benefit of the local communities and landowners most negatively affected by the Sandy Creek Solar project?

Biodiversity

EIS Main report page & statement	Response/Concern
Page 101 There are no areas of outstanding biodiversity value within the study area, as declared by the NSW Minister for Energy and Environment.	According to WWF "biodiversity is all the different kinds of life you'll find in one area—the variety of animals, plants, fungi, and even microorganisms like bacteria that make up our natural world. Each of these species and organisms work together in ecosystems, like an intricate web, to maintain balance and support life. Biodiversity supports everything in nature that we need to survive: food, clean water, medicine, and shelter." What constitutes outstanding biodiversity?

Sheep Grazing

EIS Main report page & statement	Response/Concern
Page 157 However, the land could be utilised for some agricultural practices during Project operation through the implementation of agri-solar initiatives such as sheep grazing (solar grazing), which is estimated to achieve 75% of existing stocking rates with aspirational targets of 130%. As 963.5 out of 1,668.3 ha (57.75%) of Project land is currently used for grazing, implementing solar grazing could offset a large portion of agricultural productivity impacts with the remaining 704.8 ha of currently cropped land regenerated into grazing pastures. The entire site (less the substation, O&M compound and BESS) will be suitable for grazing.	How does Lightsource BP propose to reach 130% of existing stocking rates? Will the project be split into smaller paddocks? How are sheep moved around within the panels – can working dogs be utilised? Can sheep only be moved at certain times of the day? How will worm burdens be managed for the welfare of the sheep? How does Lightsource BP propose to regenerate the currently cropped land into grazing pastures?
Page 157 Additionally, solar grazing is being successfully undertaken at Lightsource bp's Wellington Solar Farm in NSW, a similar LSbp solar project.	How many sheep are currently being grazed at the Wellington Solar project? Have any sheep perished whilst grazing within the project area? If so, what was the cause of death? Have there been issues with worm burdens?
Page 157 A full study on the performance and profitability of the grazing operation is due for completion in May 2024.	Are the results from this study publicly available? If so, where? If not, why not?

Battery Energy Storage System (BESS)

EIS Main report page & statement	Response/Concern
Page 48 Two options are being considered for the configuration of the BESS. Option A is a centralised BESS (AC-coupled) located adjacent to the substation. Option B is a decentralised option (DC-coupled), comprising approximately 114 energy storage units located across the development footprint.	See below.
EIS Appendix L page & statement	**Response/Concern**

Page 13 The BESS Option A (AC-coupled) would use lithium-ion batteries. Batteries will be stored in fully enclosed shipping or modular containers, mounted on concrete pads (Photograph 2.2). Subject to final design and equipment selection, each battery bank will be approximately 13 m long, 3 m wide and 3 m high, similar to a typical 40-ft shipping container (or two 20 ft shipping containers). The battery banks will be placed in rows and will be separated by a gravel surface.	In the case of a fire within the BESS: - will local fire fighters be expected to attend? - will local fire fighters be trained in fire fighting within a BESS? - will toxic fumes be emitted during the fire? - can BESS fires be extinguished or do they have to 'burn out'?
Page 14 The DC-coupled BESS option will involve having smaller BESS units at each inverter location. The dimensions for each BESS until will be approximately 27 long by 25 wide and will include the following components: • One PCU which contains two inverters. • Eight 20 ft BESS containers. • Eight DC converters.	On page 48 of the EIS main report it states that the DC coupled BESS option will comprise of approximately 114 energy storage units. Page 14 of Appendix L states there will be one PCU, eight 20 ft containers and eight DC converters. I request clarification of how many units will be required for the DC coupled BESS option.

Biosecurity

EIS Main report page & statement	**Response/Concern**
Page 159 Potential impacts to adjacent lands could include increased presence of biosecurity issues such as weeds and pests, as well as off-site impacts from erosion and sedimentation. Project impacts are anticipated to be limited primarily to the direct study area with minimal impact to adjacent lands.	Weeds and pests are known for their spreading movement, regardless of project boundaries or fences. Foxes, wild dogs and wild pigs are known predators of sheep. How will Lightsource BP protect neighbouring landowners and the district from livestock losses due to pest animals? Will Lightsource BP be responsible for removing weeds brought in and transferred to neighbouring properties?
EIS Appendix K page & statement	**Response/Concern**
Page 109 Project construction and operation has the potential to increase biosecurity risks through increased weeds and pests. Weeds and pathogens may be introduced through contaminated vehicles, plant and equipment; wind; and the import of contaminated soil, gravels and other substrates as part of Project construction and operation.	Can Lightsource BP guarantee all vehicles will be washed, and free of weeds, pathogens and livestock diseases? Who will be responsible for policing compliance to such mitigation measures, and what will the penalties be for non compliance by employees/contractors?

Affected Landowners & Neighbour Agreements

EIS Main report page & statement	**Response/Concern**
Page 32 LSbp has entered into lease agreements with the two associated landowners. LSbp has not entered into any agreements with associated or non-associated landowners in relation to mitigation of Project impacts, as the impacts of the Project are not significant enough to warrant such an agreement.	What does Lightsource BP consider significant enough impacts to warrant entering into agreements with non associated landowners? Has Lightsource BP indemnified all landowners directly neighbouring, and in the surrounding area from insurance liability in the case of

	damage to the solar installation? Is Lightsource BP reimbursing the same direct neighbours, and landowners in the surrounding district, for any increase in insurance premiums? Will Lightsource BP be responsible for rectifying any flooding/erosion on neighbouring, or further downstream properties, caused by construction activities?
EIS Appendix L page & statement	**Response/Concern**
Page 46 A number of non-associated and associated residences have been identified within and surrounding the Project area, as shown in Figure 4.1. There are two associated residences within the Project site (A01 and A03). There are two unoccupied structures (sheds) associated with the Project (A02 and A04), which are located in the study area. There are 20 non-associated residences within 4 km of the study area, along with Dapper Union Church and the NSW Rural Fire Service.	Has Lightsource BP conducted a survey of the 20 non associated residences within 4km of the study area to gauge the sentiment toward the project from those directly impacted by its construction? If so, please supply details. If not, is it not important to Lightsource BP to have community support for their projects?

Air Quality

EIS Main report page & statement	**Response/Concern**
Page 245 The Project's main air quality impacts will be temporary as they will occur during construction, which will take approximately 22-28 months. Potential construction air quality impacts will be caused by dust generation from surface disturbance works, exhaust emissions from diesel powered construction equipment, and soil, mud and other organic debris being carried out of the construction site by vehicles (track-out).	How is it acceptable that residences within the area, and farmers working in adjacent paddocks will be subject to poor air quality for 22-28 months? Will that have detrimental effects on a famers ability to work and earn a living or on their livestock?

Households Powered

EIS Main report page & statement	**Response/Concern**
Page 237 The Project has the potential to provide sufficient renewable energy to support the annual electricity needs of the equivalent to approximately 253,419 NSW households, which is seven times the annual electricity requirements of the EIA study area.	Will the project power the stated number of homes only when the sun is shining, or 24 hours a day, 7 days a week? How is the New South Wales experiences 4-5 hours peak sun hours per day in summer and 3-4 in winter. According to the Australian Energy Regulator in 2023, the average energy used per day by a household with four people is about 21.355 kWh which is equal to 0.89kW. Peak hours of use are 6-8.30am and 5-9pm; all hours outside the peak sun hours. Is renewable energy going to provide reliable and cost effective power to Australian residents?

	My home and business has been off grid for just over 12 months. We installed 20kW of solar panels and have 44kWh of battery storage with a backup generator. This system is responsible for powering two homes, a water pressure pump and workshop. Without the backup generator our property would have been in the dark at some point on one out of every five days. Solar electricity generation is fantastic when the sun is shining but far to intermittent and unreliable to base a grid on.

Cumulative Impacts

EIS Main report page & statement	**Response/Concern**
Page 254 There is potential for cumulative construction noise impacts from other concurrent construction works particularly related to CWO REZ infrastructure including Elong Energy Hub and transmission line network. Construction noise impact results are worst case predicted impacts and are only likely to occur for a period of a few months as work is undertaken near the site boundary near noise assessment locations.	Is it acceptable that sensitive receivers are exposed to noise impacts for a period of a few months? Whilst this is temporary, it is not a few hours, but a few months. That could have major impacts on the mental health of directly impacted community members. Are any Lightsource BP employees directly affected by this noise? Imagine it was your home and family in this position.
Page 254 As this Project is within the CWO REZ, cumulative impacts from concurrent construction of renewable energy projects and transmission infrastructure are expected due to the increase in construction vehicles across the road network. However, there is uncertainty regarding other the timing of other projects and therefore the extent of cumulative traffic impacts. Many projects will use the state road network between the Port of Newcastle and the CWO REZ.	There are major cumulative impact issues with regard to the state road network between the Port of Newcastle and CWO REZ. The Golden Highway is a funnel from western NSW to the Port of Newcastle for agricultural freight, both inputs and products for export. The Golden Highway is also a major route for livestock transport. The use of the Golden Highway by the vast majority of heavy and OSOM destined for the CWO REZ has the potential to increase accidents (severe and fatal) due to frustration from other road users. According to truck drivers road users are already making dangerous decisions on the Golden Highway to pass heavy vehicles. My property is split by the Golden Highway. Walking livestock across the highway to access feed and water is an onerous task; one often fraught with danger. How will landowner safety, and that of their livestock, be guaranteed by Lightsource BP due to project traffic increases on the Golden Highway? The cumulative traffic impacts to the Golden Highway must be clarified and quantified, and adequately addressed prior to determination of any CWO REZ renewable energy projects.

Page 255 Due to the large-scale and expansive nature of the CWO REZ, cumulative impacts are unavoidable to some extent and should be combatted at a policy level. The NSW Government and EnergyCo have an important role to play in terms of ensuring a coordinated, strategic approach is taken to address many of the cumulative impacts.	How does Lightsource BP suggest the NSW Government and EnergyCo combat the unavoidable cumulative impacts of renewable energy infrastructure projects within the CWO REZ?
Page 255 Competition for labour could result in worker poaching and temporary wage increases which can render local businesses unable to retain workers. Additionally, competition for workers, goods, and services are expected to magnify competition in the regional market which could price out smaller businesses seeking the same resources, affecting their commercial viability and profitability, which could ultimately result in business closure (Black, Land & Nunn 2021).	As a farmer, I can personally attest to the fact agricultural businesses are currently struggling to find labour, both on permanent full time and contract or short term basis'. It is common knowledge that agriculture cannot compete with mining, and I'd suggest renewable energy infrastructure wages, therefore finding labour will only become harder for farmers. Less labour means less productivity and therefore less food and fibre. Price increases for inputs will see small businesses within rural and regional areas struggle and possibly close. How does Lightsource BP plan to protect small rural businesses within the local district?
Page 256 Projects are required to mitigate their own impacts to acceptable levels, which will minimise cumulative impacts overall.	What is an acceptable level when considering mitigation measures?
EIS Appendix K page & statement	**Response/Concern**
Page 111 Cumulative impacts to soil, land and agriculture primarily relate to potentially reduced regional LSC and associated impacts to agricultural land productivity and availability within the REZ and relevant LGAs throughout construction and operation, as well as construction impacts on erosion and sediment control. Impacts from projects may include site erosion and/or sediment resulting in reduced soil availability and sediment migration to watercourses that pass through or occur downstream of a construction site.	The agricultural industry is financially valuable to the economy; local, state and country wide. Regions losing production will impact rural and regional areas, possibly ruining some small villages and towns in the process. Erosion and sediment migration are known issues at solar installations currently operating and under construction – neighbours dams have been filled with sediment, water courses have been changed causing flood damage in sheds (where flood water had not been prior) and all weather access roads have been flooded and damaged. Once these impacts have occurred mitigation measures will be ineffective.
Page 111 Due to the identification of centralised REZs, the cumulative impacts on availability of agricultural land within these areas is unavoidable.	The CWO REZ was declared without proper community consultation or engagement. If there was better information sharing and more listening to the feedback from community members on the ground, those who are left to deal with the impacts of decisions from above, maybe the availability of agricultural land would not be at risk; at the very least there would not be unavoidable impacts.

Page 132 Overall, potential Project and cumulative impacts during construction and operation are considered minor and can be adequately managed through the implementation of the mitigation measures outlined in Section 8.	Are the cumulative impacts considered minor to those assessing the project, who will not live with the potential impacts 24/7, or those who will live with the impacts? How is adequately managed defined?

Project Justification

EIS Main report page & statement	Response/Concern
Page 257 The study area location was selected and is considered highly suitable for the Project due to: • high solar irradiance • proximity to the proposed Elong Elong Energy Hub (with capacity to export energy into the grid) • site location within the CWO REZ • limited mapped biophysical strategic agricultural land within the study area • high degree of historical land clearing and absence of high value native vegetation • zoned RU1 which is a prescribed zone where electricity generating works are a permissible land-use and the environmental and planning constraints can be effectively managed • suitable vehicular access from the Golden Highway and Sandy Creek Road • adequate development footprint size • minimal topography constraints • low flood risk • landholder willingness to enter into legal agreements • isolated nature of the surrounding valley and low number of receivers relative to the size of the Project • suitable distance from major townships (approximately 25 km)	The Elong Elong Energy Hub is not yet approved – what is Lightsource BP's alternative plan to export energy into the grid if the CWO REZ transmission project is not approved? The CWO REZ was declared without the knowledge or consent of the local community making the district a target for renewable energy projects – should not be justification for the location of projects. No BSAL should be impacted by renewable energy infrastructure. According to the Warrumbungle LEP electricity generating works are not permissible within the RU1 zone. How many receivers is low? Isolated is defined as "far away from other places, buildings or people" – the Central West Slopes and Plains is not isolated. What constitutes a "suitable distance from major townships"?
Page 266 The assessments undertaken and conclusions reached demonstrate the Project can be constructed and operated within acceptable limits though the implementation of mitigation and management measures described in Chapter 6 and Appendix F. The Project will not result in significant impacts to the environment or community. It is considered that the environmental, social, and economic benefits for the local, regional, and NSW communities far outweigh the temporary impacts resulting from development and operation of the Project. Therefore, the Project is in the public interest.	What are acceptable limits? What constitutes significant impacts to the environment or community? What time frame is considered temporary? I note the term has been used for construction (22-28 months) and operation (40 years minimum). I do not believe 40 years temporary! Public interest is defined by Collins Dictionary as "the welfare or well-being of the general public; commonwealth". As members of the general public I do not believe projects like Sandy Creek Solar are in the interest of the landowners and community members directly affected by the potential monumental impacts of it, and the

	cumulative impact of all projects within the district and state.

Decommissioning & Rehabilitation

EIS Appendix K page & statement	Response/Concern
Page 131 At the end of the Project life, the development footprint will be rehabilitated to a condition as near as practicable to the condition that existed prior to construction of the Project and in consultation with the landowner.	How will the rehabilitation of the land be carried out? How long until the land will be capable of producing what it did prior to construction? Will Lightsource BP be responsible for replacing trees destroyed during construction? How will livestock find shade a shelter until any replacement trees are mature? Lightsource BP has already sold five Australian solar projects. Will any agreements regarding decommissioning and rehabilitation made by Lightsource BP be honoured or will new agreements need to be made with any potential new owner of the project?

Warrumbungle Shire Council

EIS Main report page & statement	Response/Concern
Page ES.1 RU1 Primary Production zoning under the Warrumbungle Local Environmental Plan 2013 (Warrumbungle LEP) and the Dubbo Regional Local Environmental Plan 2022 (Dubbo LEP), which is a prescribed zone where electricity generating works are a permissible land-use and the environmental and planning constraints can be effectively managed.	Electricity generating works (ie. solar, wind, transmission infrastructure) is not listed as permitted with or without consent in the Warrumbungle LEP. Warrumbungle LEP 1.2 Aims of Plan (2)(c) to encourage the retention of productive rural land for agriculture
EIS Appendix L page & statement	**Response/Concern**
Page 48 The Warrumbungle Shire Council has identified Warrumbungle is supportive of community connectivity, growth and resilience, and encourages a healthy environment and community as the vision of the community in their Local Strategic Planning Statement (LSPS) (2019). This would indicate there is a high value placed on the environment. This includes elements such as: • ensure that development is not permitted to be built in areas that are significantly impacted by flood waters • ensure that development is not permitted to be built in areas that are highly bushfire prone • ensure Council encourages private water supply through the installation of rainwater tanks	Warrumbungle Shire Council advocates for developments not being built in highly bushfire prone areas, protection of important agricultural land, supporting the agricultural sector and associated businesses, managing land use conflicts on agricultural land and avoiding the location of incompatible land uses adjacent to agricultural production areas. All of these elements suggest installing renewable energy infrastructure, and changing the landscape to an industrial area is against Warrumbungle Shire Council policy. Warrumbungle Shire Council has continually objected to proposed renewable energy projects within the LGA.

• protect important agricultural land in local planning controls • support the agricultural sector and associated businesses in each locality • manage land use conflicts on agricultural land • restrict the separation of incompatible land uses surrounding agricultural land • avoid the location of incompatible land uses adjacent to agricultural production areas • investigate opportunities for the expansion of existing and new industrial precincts in our townships that do not impact on residents • protect and recognise existing industrial precincts and uses to avoid land use conflicts from future residential development • encourage the co-location of complementary industry alongside agricultural enterprises that enhance the efficiency of the agricultural land use.	

Inaccuracies & errors

EIS Main report page & statement	**Response/Concern**
Page 21 Residences and farm structures are dotted across the landscape. There are two associated residences within the study area (A01 and A03), though only A01 is an occupied residence, and two associated unoccupied structures (sheds and yards) (A02 and A04). There are **23 non-associated residences within 4 km of the development footprint.** **Appendix L Page 59** There are a total of **25 dwellings within 4 km of the development footprint.** The highest visual impacts are likely to be experienced from dwellings within close proximity to the development footprint. **Appendix L Page 46** A number of non-associated and associated residences have been identified within and surrounding the Project area, as shown in Figure 4.1. There are two associated residences within the Project site (A01 and A03). There are two unoccupied structures (sheds) associated with the Project (A02 and A04), which are located in the study area. **There are 20 non-associated residences within 4 km of the study area, along with Dapper Union Church and the NSW Rural Fire Service.**	How many non associated residences are there within 4km of the development footprint?
Page 157 Additionally, solar grazing is being successfully undertaken at **Lightsource bp's Wellington Solar Farm** in NSW, a similar **LSbp solar project**.	According to Lightsource BP's website Wellington Solar was sold to Beijing Energy International Australia in December 2023.

Page 165 Two solar projects under construction include Stubbo Solar Farm and **Dunedoo Solar Farm**.	While the Dunedoo Solar project has been approved, it is not currently under construction.
EIS Appendix L page & statement	**Response/Concern**
Page 73 Dunedoo Solar Farm (**approved and under construction**) located 25 km east of the Project	While the Dunedoo Solar project has been approved, it is not currently under construction.
Page 68 Based on the glare analysis, there is potential for glint and glare related impacts at **13 residences** and along the roads adjacent to the Project. **Page 84** Based on the glare analysis, there is potential for glint and glare related impacts at **16 residences** and along the roads and rails adjacent to the Project.	Disparity between the number of residences potentially impacted by glint and glare within the same document, less than 20 pages apart.
EIS Appendix R page & statement	**Response/Concern**
ES.1 The closest township to the Project site (30 minute drive north-east) is Dunedoo, with a population of 1,097. The Dunedoo township makes up for about a third of the population that comprises the local study area.	According to Google Maps, Dunedoo (Post Office) is 23.3km from the Golden Highway/Sandy Creek Road intersection and therefore approximately a 15 minute drive.
ES.1 Dubbo is a major regional city and a key urban area of the Far West and Orana region, **located about a 70-minute drive west of the Project site**.	According to Google Maps, Dubbo (Post Office) is 66.7km from the Golden Highway/Sandy Creek Road intersection and therefore approximately 45 minute drive.
Page 41 The Warrumbungle Shire LGA is situated on the north-western slopes and plains of NSW, **about two hours' drive from Dubbo** (REMPLAN, 2023).	The Warrumbungle LGA is located within the Central West Slopes and Plains. Coonabarabran is the largest town within the Warrumbungle LGA and is located 144km from Dubbo (approximately a 90 minute drive).
Page 42 The closest township to the Project is Dunedoo, **which is a 30-minute drive north east of the Project site**, about 55 minute drive north of Mudgee and **90 minute drive east of Dubbo.**	According to Google Maps, Dunedoo (Post Office) is 23.3km from the Golden Highway/Sandy Creek Road intersection and therefore approximately a 15 minute drive. Also according to Google maps Dunedoo (Post Office) is 90km from Dubbo (Post Office) and therefore an hours drive.
Page 42 Dunedoo has more facilities than typical villages of similar size, and functions as a service centre for the surrounding district, particularly for villages within the Warrumbungle Shire LGA.	Dunedoo has very similar facilities to other rural towns of comparable population and size. Coolah is another town within the Warrumbungle LGA with much the same facilities available.
Page 42 The local economy involves wheat, cattle, mixed farming, **timber**, lambs, and wool production.	Timber industry?
EIS Appendix N page & statement	**Response/Concern**
Page 45 Table 5.9 Elong Elong Energy Hub – EnergyCo – CWO REZ transmission infrastructure, located adjacent to (and within) the project site – IOn exhibition	The CWO REZ transmission project EIS was on exhibition from 28th September to 8th November 2023. It is currently being assessed by the DPHI.

Conclusion

When the inaccuracies and errors within the EIS documents are considered the lack of knowledge of the local area becomes blatantly obvious. There is also an apparent arrogance in the insufficient research conducted by EMM Consulting in preparing the aforementioned reports, and/or the information provided by LightsourceBP; a simple Google Maps directions search would've quickly provided the correct information. The author did not even make the effort to correctly identify the current status of the CWO REZ transmission project. This is insulting to the affected community.

It appears that any negative impacts are low, very low, minor, negligible or insignificant whereas impacts deemed beneficial are moderate and high. Is insignificant, minor or negligible a quantifiable measure when it comes to subjective impacts? Is it acceptable for people that are not currently, nor will ever be likely to, face direct impacts to their personal residence or place of business to assess the potential impacts? The guidelines applicable to assessing impacts of renewable energy projects do not adequately address issues according to the people that will have to live with the impacts.

The rollout of the "rapid transition to renewable energy" has brought the term "social license" in vogue; unfortunately, it seems to be a trendy phrase with no authentic meaning nor does it have any genuine gravity. Should a project be granted consent if the majority of the community affected does not support it, in fact, objects to it?

There are many issues I have failed to address within this document due to time constraints. Inhabitants of the CWO REZ are being pushed to breaking point when considering the number of projects being thrust upon the area. Cumulative impacts are a major issue not being adequately considered or mitigated by the REZ infrastructure planner, EnergyCo. The NSW Government has rushed into the "rapid transition to renewable energy" without forethought or adequate planning leaving rural and regional NSW reeling.

I do not believe Sandy Creek Solar is in the public interest.