



29th October 2024

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**Objection – Stratford Pumped Hydro and Solar
Application No SSI – 73368213**

Advance Gloucester Inc. wishes to object to the above project as being presented.

However, we wish to state that we feel the Pumped Hyrdo Energy Storage aspect of the proposal is acceptable and we fully support that aspect of the proposal only.

The Gloucester basin community has had a number of State Significant Infrastructure projects to digest over the years - AGL Energy's Gloucester Coal Seam Gas Project which also had Critical State Significant Infrastructure status along with Gloucester Resources' Rocky Hill Coal Mine Project.

Both of these were rightfully scrutinised over an extended period of time by the community and other stakeholders for project awareness, understanding and transparency.

Concerns with Consultation and Transparency

Substantial concerns around the level of effective community engagement, particularly given Critical State Significant Infrastructure status. Yancoal elected not to have any 'shop front' presence in Gloucester leading up to or during the EIS exhibition period.

Concerns around the lack of openness and transparency with the information provided by Yancoal to the community that they did manage to engage with.

Their message painted an 'exciting' image of the proposal both in newsletters and in Yancoal's EIS Summary itself.

However buried in the EIS, the less 'exciting' realities that the Solar Farm would cover an area of 520 Ha (1,284Ac) but only supply up to 50% of the power to 'charge' the PHES and would require upgrading of TransGrid's transmission network south to Stroud Road then possibly onto Tomago under full development, become more obvious.

It was concerning that even after Yancoal had briefed groups and individuals about the project, very few were aware of the scale of the solar farm footprint, its capacity in relation to the wider project and certainly nothing about downstream transmission line upgrades.

Typically, rural communities can't relate to or quantify what 625,000 solar panels may look like, what 3.6 GWh's is or even care that it would power between 140,000 to 180,000 homes. However, mention 1,284 Ac solar footprint and they are absolutely 'gob-smacked', regardless of its location.

A suggestion was made to Yancoal to sponsor a coach and invite members of the community to have a look at an operative solar farm; a 'field trip'; to help comprehend what is being proposed.

A similar 'field trip' initiative was offered by AGL some years earlier to look over their Camden Coal Seam Gas Project at Menangle, south of Sydney. Hunter Water (again with CSSI status) also committed to a similar field trip exercise as part of their proposed Tillegra Dam at the time, in transporting interested community members and stakeholders to visit Keepit Dam near Gunnedah, similar in size to what Hunter Water were proposing at that time near Dungog. Both field trips provided valuable community insight into what was being proposed by each proponent and significantly improved community awareness and understanding.

Sadly, this level of engagement, which our community now expects as a benchmark for assessing major projects unfamiliar to them, never eventuated let alone garnered a response from Yancoal.

Following are the key aspects of contention that Advance Gloucester Inc. has concerns with.

Current Site Obligations

As Yancoal has ceased mining at both its Duralie and Stratford operations, there is concern that their focus to address current mine closure obligations may be being distracted by their current proposal. Clearly, there would be cost benefits in concurrently decommissioning one project while developing another.

Unlike other similar energy projects, Stratford is not a 'green field' site, but one that still has substantial and longer term obligations to fulfil in order to achieve final signoff. We do not want to see these obligations diluted nor accelerated.

Loss of Agricultural Productivity in a Humid High Rainfall Landscape

The Gloucester basin is widely renowned for its relatively high rainfall and humidity – which is one reason the Australian Agricultural Company (AACo.) originally set up its headquarters in nearby Stroud 35 kms south of Stratford in 1884. Our climate is conducive to high pasture and vegetation growth and saw the region develop on the back of the timber, dairy and grazing industries.

As the 520 Ha Solar Farm will occupy agricultural land comprising grazing country never previously disturbed by mining operations as well as re-established grazing areas on rehabilitated land, we feel that this proposal unjustly sterilises a significant area that was initially understood to be returned back to rural land use.

Yancoal has achieved impressive results to date in re-establishing open grazing country during rehabilitation, to the extent that centre pivot irrigators were used to beneficially dispose of diverted site water while establishing and growing improved pasture species.

Conversely and somewhat sadly, Yancoal missed a great opportunity to apply the same level of attention to its undisturbed grazing country (typically alongside the Bucketts Way), which has been allowed to completely run down and significantly decline in productive capacity to what it was originally.

Furthermore, the majority of Yancoal owned lands have suffered the above fate over the years, significantly declining in productive capacity. This has been addressed somewhat in recent years, with a more structured lease arrangement involving tendering pastoralists responsible for managing aggregated lots.

The vast majority of the region's dairy and beef production occurs on country similar to that proposed to be dedicated to solar.

In fact, it was well known that in a favourable season, total milk production from previous dairies located along the dryland Avon River valley (most since purchased by mining) exceeded that produced by their irrigated counterparts along the mighty Barrington River.

We have concerns that assumptions around land productivity involving the proposed site as being less productive than agricultural land elsewhere, may be significantly overstated. In the end, it's not necessarily the quality of the land, it's what you do to it that determines its productive capacity.

Additionally in more recent years, the Gloucester basin area is experiencing a significant up-swing in agricultural land purchase, amalgamation and improvement by existing landowners as well as outside interests. This is creating improved employment opportunities for rural managers, contractors and economic benefits to suppliers.

Extinguishing of Community Aspirations and Post-Mining Employment Opportunities

The proposal appears to completely negate any previous community aspirations post-mining, aimed at mitigating economic loss to our region. The project indicates that 10 full time jobs will be created post construction with others casually for maintenance purposes – presumably to maintain the vast solar footprint.

Around 15 years ago, the former Gloucester Shire Council in collaboration with Newcastle University engaged a wide cross section of the community at the Gloucester Country Club to workshop potential options for the Stratford mine site post mining.

An extremely unique and attractive catalyst for discussion involving this site, is the fact that it is the only Heavy Industrial (E5) zoned land anywhere within the current MidCoast Council area. Consequently, there was significant discussion around the potential of establishing an industrial hub, given the zoning as well as ready access to the Bucketts Way, North Coast Railway, TransGrid's 132 kV transmission line and Essential Energy's network as well as on-site water bodies.

Additional to this, tourism and recreational opportunities were entertained, as well as agricultural enterprise given grazing lands both previously unaffected by mining and as well as those re-established during rehabilitation phases, would become available again post mining.

It is not obvious from Yancoal's documentation whether or not these community aspirations may still be able to be entertained or to what extent, if any. Our region will need to be able to create and retain many multiples of the stated levels of employment that the fully commissioned project is slated to deliver.

Visual Impacts on a Predominantly Rural Landscape.

Yancoal is one of the most significant landholders in the entire Gloucester Basin. It is acknowledged that the original footprint of the proposed solar farm has been modified somewhat. That said, we feel Yancoal has many options on other land it owns as a means to become even less conspicuous.

Subsequent to Yancoal presentations outlining the project, the majority of the community still have no comprehension of the scale – largely due to Yancoal not being overly transparent within their literature. Almost without exception, the 520 Ha solar footprint raises great concern along with its visual impact on the wider rural landscape.

While Advance Gloucester opposes any solar farm proposed for our region in total for the reasons contained in this submission, we propose that an embargoed area (Figure – Potential Embargo Areas) be seriously considered as part of conditions of consent if approval should be given at any stage in order to eliminate as much as possible any visibility from alongside the Bucketts Way and consequential modification to the existing visual rural landscape from same.

This area would indicatively affect proposed solar areas 1, 2, 3, 4 and 8 and include :-

DP 1125089 Lot 442; DP 1164626 Lot 20; DP 1164626 Lots 21 & 60; DP 979859 Lot 61; DP 1093998 Lots 62,63 & 64; DP 196277 Lot 1; DP 644409 Lots 1,2 &3

The whole time that both Duralie and Stratford mines have operated, their essential infrastructure and activity has been either distant or significantly visually obscured by natural geography. Advance Gloucester contends that the same level of visual obscurity should apply to this proposal also.

A poor example of achieving visual obscurity is a hideous physical screen alongside the Bucketts Way at Wards River Station as part of Yancoal's Duralie mine site. This drew heavy criticism at the time and involved little consultation or imagination on the part of Yancoal.

Advance Gloucester has also investigated solar farms in other regions – 1) Canadian Solar's Orange Grove Road solar farm near Gunnedah (see figure 'Gunnedah Solar Farm') and 2) lightforce bp's solar farm near Wellington (see figure 'Wellington Solar Farm').

It is worth noting that both regions receive about half the annual rainfall of Stratford – which we feel is a significant issue when assessing the Stratford proposal.

- 1) Is located on pretty much flat former cropping country; Is completely visually obscured when viewed from the Oxley Hwy (3.3 kms away – green line) & unable to be discerned from the nearest public road being Orange Grove Rd (1.3kms from solar farm compound – yellow line); is smaller in capacity to that proposed at Stratford
- 2) Is located on sloping to rising former sheep country, is totally ring-fenced by public roads in all directions; is larger in capacity to that proposed at Stratford.

While we fully oppose large scale solar farms involving a footprint on any agricultural lands, of the examples given above 1) is far less visually intrusive than 2) given attempts by the proponent to achieve a sympathetic visual outcome associated with an unpalatable situation. Yancoal's current proposal falls way short of this community expectation.

Solar Farm management

Given the high rainfall and humidity already alluded to, we are concerned that management of the vast solar farm footprint has not been given adequate consideration.

This region is not suited to sheep grazing under the panels as a means of grass / weed control unlike that engaged with other solar farms in drier inland areas. Goats would 'play' on the panels and cattle would 'rub' on them. That leaves either chemical and / or mechanical options which will be prone to their own limitations and more regular frequency which will be required as a result of rapid growing conditions for both grasses and weeds, again when compared to drier regions.

Unlike rooftop solar, mechanical ground maintenance amongst the panels during drier months to reduce grass residue will inevitably produce dust and flying debris from the disturbed ground, creating further problems.

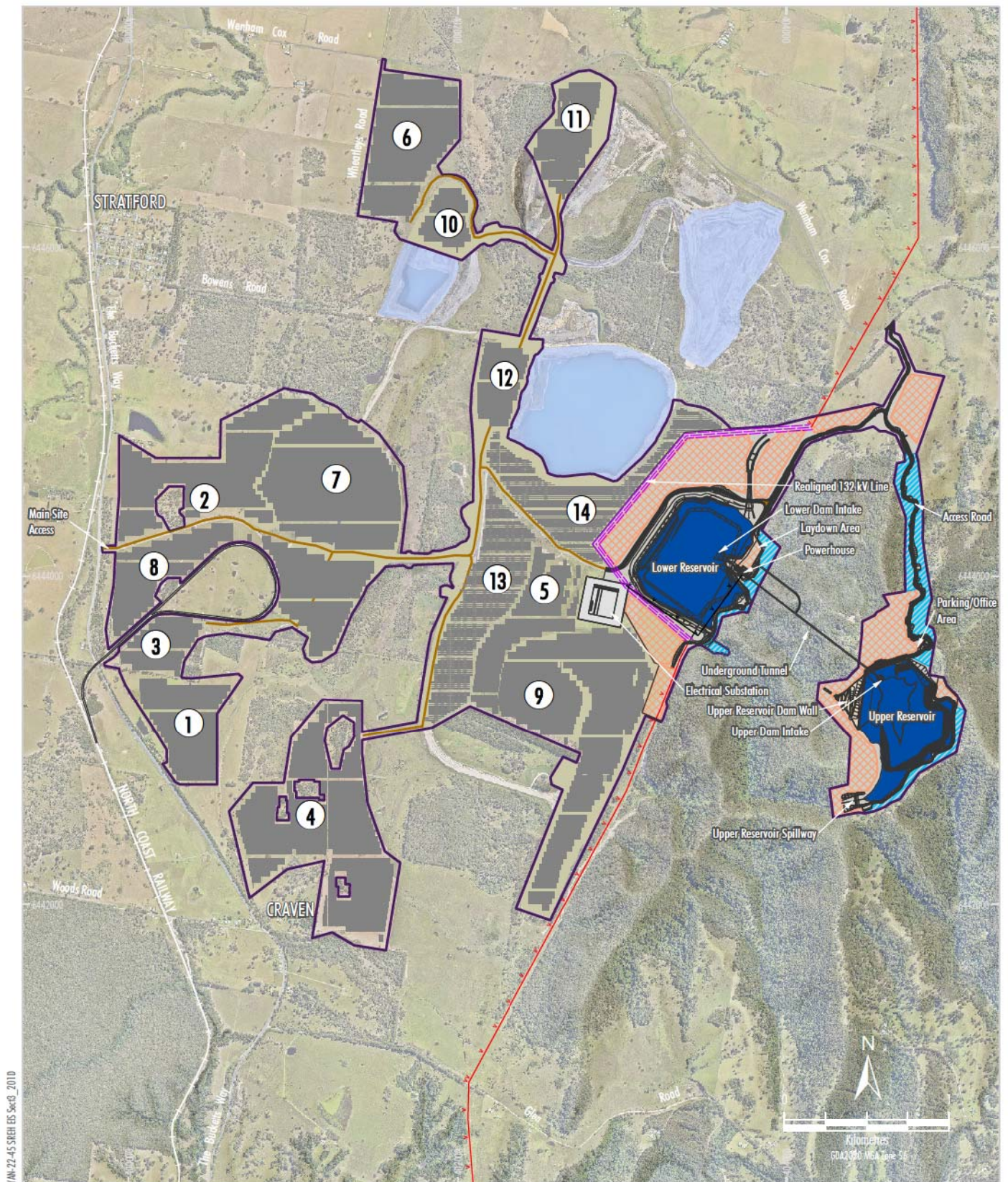
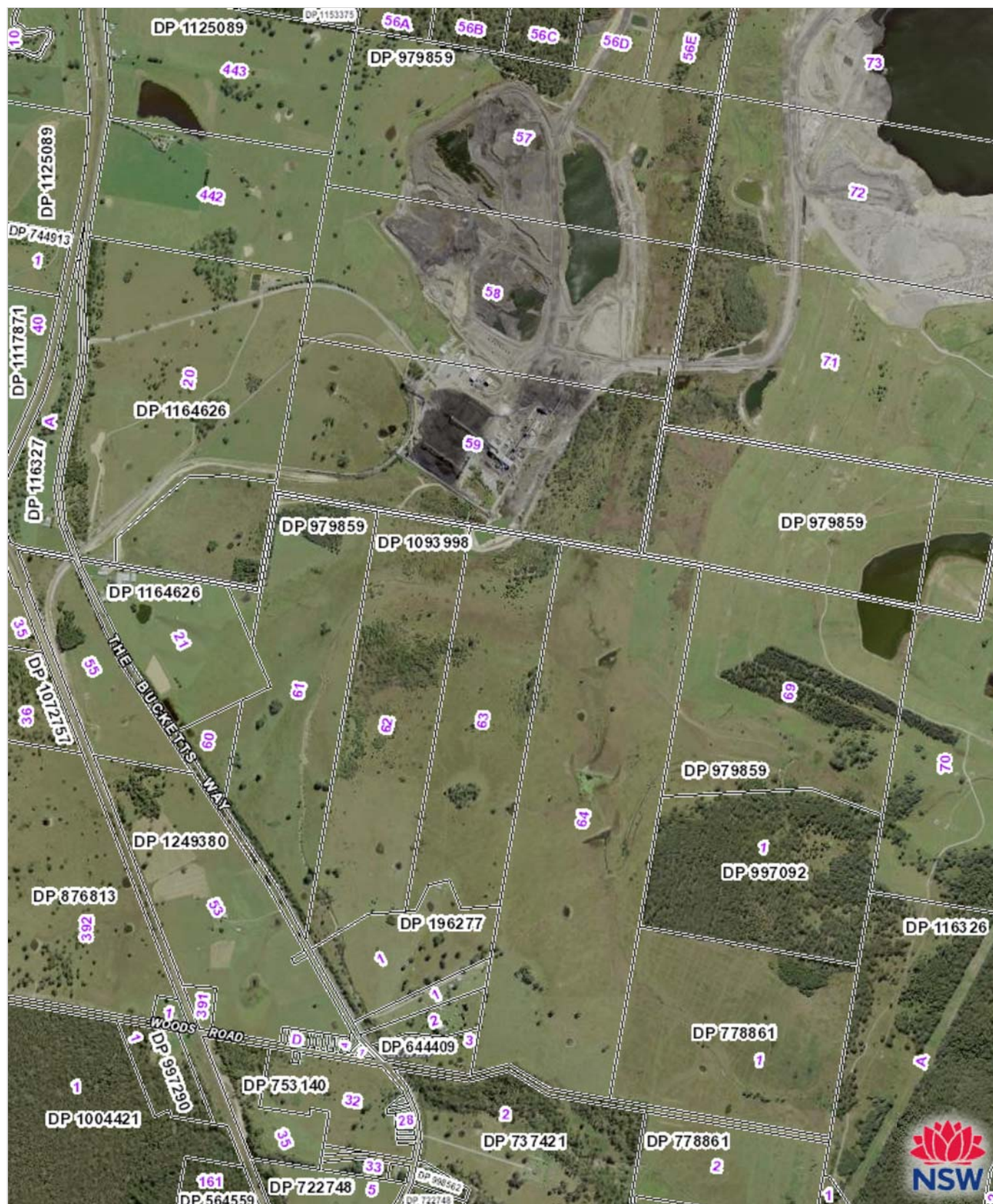


Figure 3-10

Proposed Stratford Solar Farm

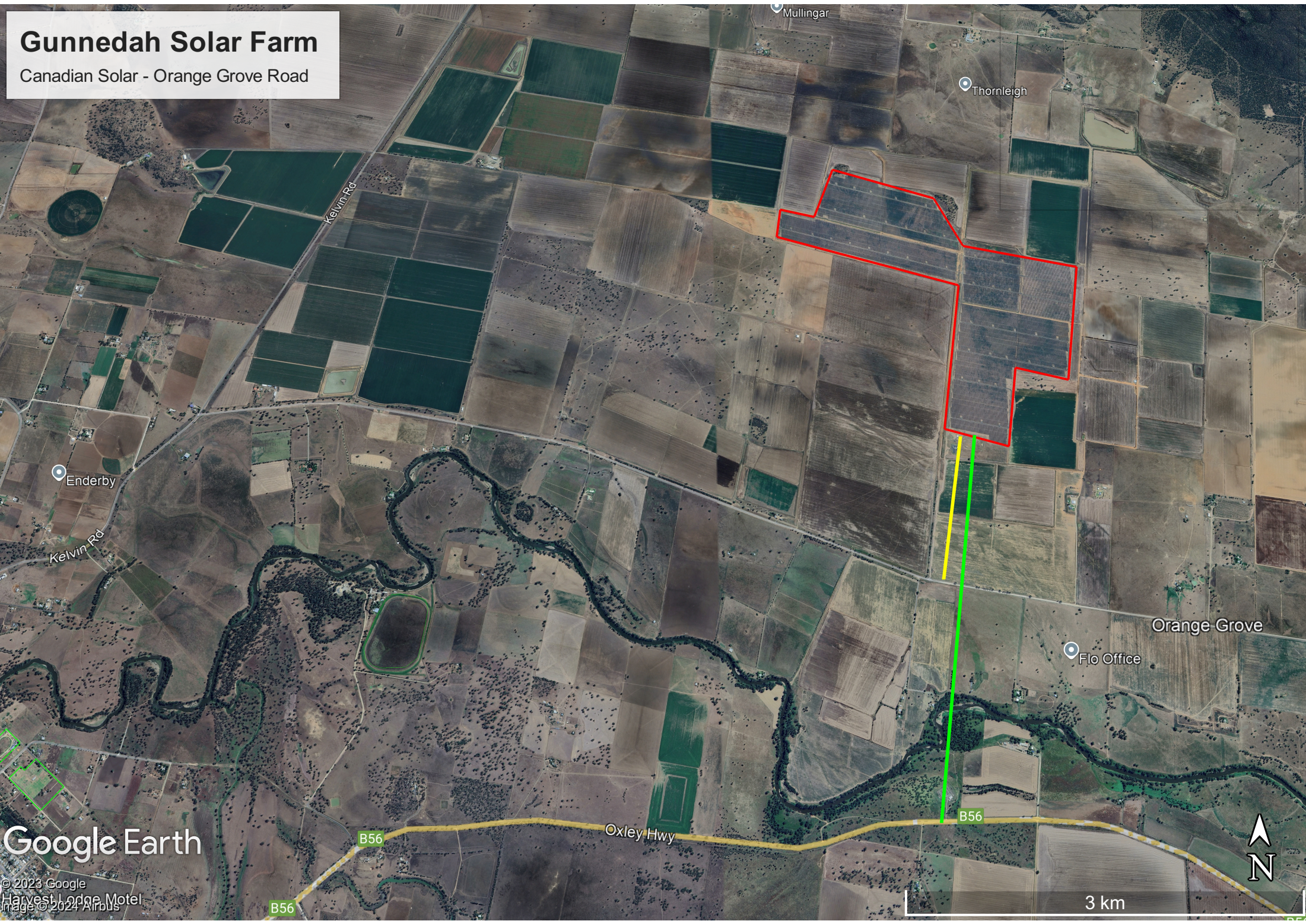
Potential Embargo Areas



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Gunnedah Solar Farm

Canadian Solar - Orange Grove Road

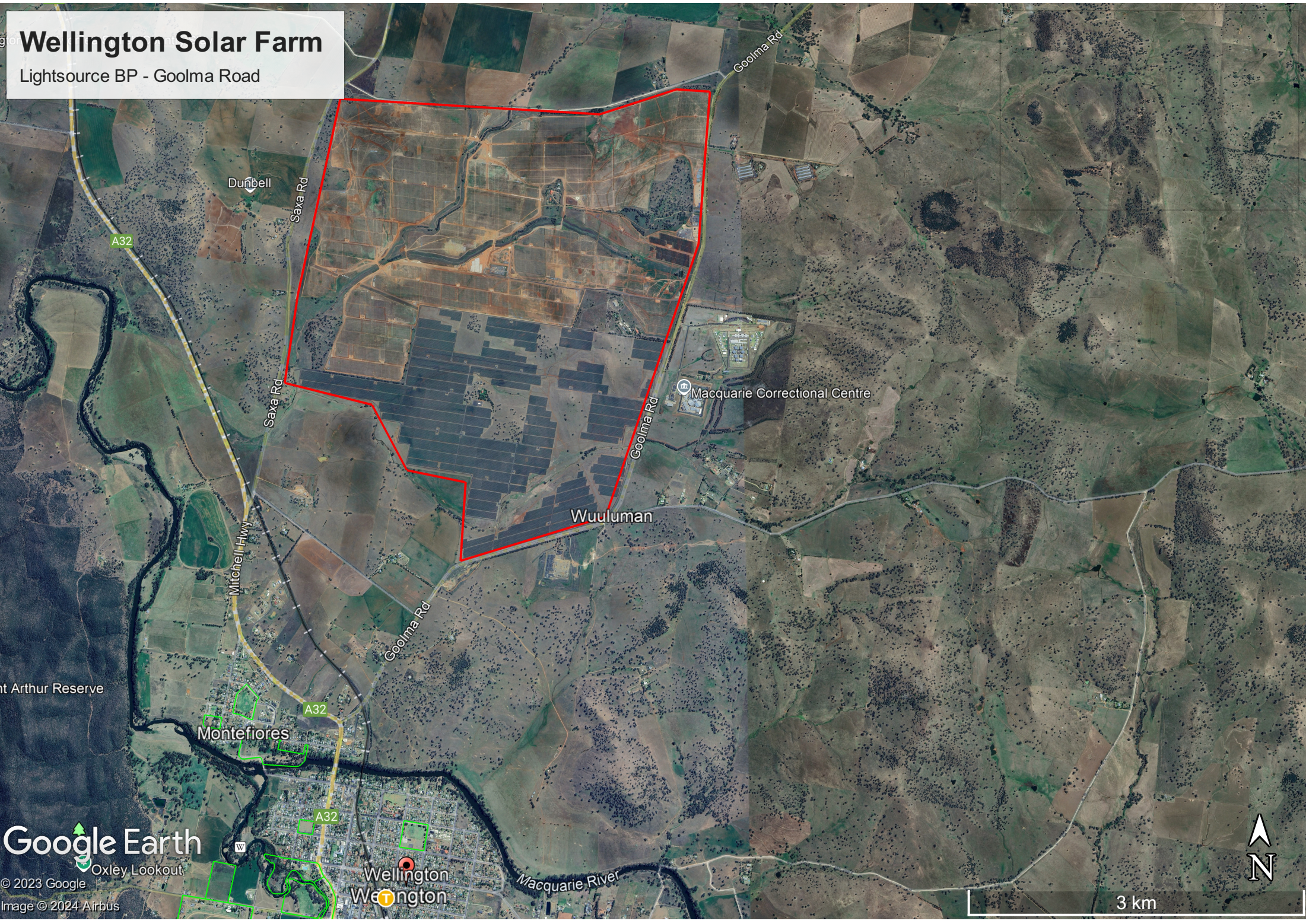


Google Earth

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Harvesting on the Motel
Image © 2024 Airbus



3 km



Wellington Solar Farm

Lightsource BP - Goolma Road

Dunbell

Saxa Rd

A32

Goolma Rd

Saxa Rd

Goolma Rd

Macquarie Correctional Centre

Wuuluman

Mitchell Hwy

Goolma Rd

A32

Montefiores

A32

Wellington

Macquarie River

Google Earth

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3 km

Additionally, solar area 4 is a locally known as a particularly wet area for prolonged periods of time, so physically accessing this area for regular maintenance would prove more challenging than most of the other areas combined.

Required Upgrades to TransGrid's Transmission Lines

Although it is our understanding that this aspect is not required to be assessed as part of this project, it is certainly mentioned in the EIS but seems to have been deliberately not mentioned by Yancoal to the wider community, particularly to those that have a current TransGrid easement south of Stratford.

In fact, the commentary in the EIS seems almost deliberately ambiguous in order to conceal any possible realities of third party impacts to downstream landholders.

Summary

Advance Gloucester Inc. expects that the above concerns will duly be considered as part of Yancoal's Stratford Pumped Hyrdo and Solar Project EIS exhibition.

While our region has been subject to a number of major project proposals by different companies over the decades, Yancoal's attitude and approach to the community throughout this consultation process has been very disappointing and significantly deficient by comparison.

Yours Sincerely,

A handwritten signature in dark ink, appearing to read 'Rod Williams', with a stylized flourish at the end.

Rod Williams – Deputy Chair