

## EIS Submission FINAL 6 December 2024

Stan Moore 400 Kooringaroo Road GUNDARY – Lightsource reference R9

I OBJECT to the Gundry Solar and BESS proposal, SSD 48225958 for the following reasons.

### OUR RURAL LIFESTYLE BLOCK

1. Realestate Agent - **Property description July 2012** – Beautiful sheltered grazing property only 13.5km from Goulburn all the benefits of location with the privacy of this productive sheltered property. Fenced into 3 paddocks and 3 dams, dwelling entitlement, power on property. Magnificent views and sheltered private valleys. Suitable sheep, cattle or horses. Around 30% mature tree cover scattered over property. Great weekender or beautiful place to live.
2. Realestate Agent and property valuer - **Property description February 2022** – Undulating grazing with nice shade and shelter trees and remnant native bushland. The property is just 15 minutes from Goulburn and just over 2 hours from Sydney with only 1km of gravel road to front gate.

The property is well managed improved pastures, steel sheep and cattle handling facilities, a laneway system for stock handling ease and trough water to most paddocks.

The home on the property is a well-designed 3-bedroom 2 bathroom that enjoys fantastic views of the surrounding rural landscape.

This assessment was made prior to receiving information from BP that they were proposing a 7 square kilometre industrial scale solar factory beside us.

3. Realestate Agent and property valuer provided a valuation in November 2022 and estimated a reduction of 32% in value as a result of the solar farm. **This was before the extent of the solar project and its proximity to our house was known.** He said that was very difficult to give a conclusive depreciation percentage but that the proximity of the solar farm would reduce the number of potential buyers.

### WHY WE HAVE CHOSEN TO LIVE ON A RURAL LIFESTYLE PROPERTY

I grew up on a mixed farming property west of Forbes on the Lachlan River. I was a partner of a family farm operation. Farming and its lifestyle are in my blood. I studied farming and at Agricultural College in Japan for 15 months after leaving school. When I returned I studied Agriculture. I commenced work in Sydney spending considerable time in agricultural related businesses and environment.

In the early 2000's my wife and I started looking for an opportunity to escape to the country and eventually, after looking at opportunities within 4 hours drive from our Sydney home at

the time, we finally identified a property just out of Goulburn and exchanged contracts on what is known as Gundillawah Park in July 2012.

In October 2015 we made the decision to move from Sydney to Gundary. Our house was completed in 2017 and was built taking into account features that would make it easier to live in as we got older.

Coming to Goulburn was the best thing we have done as it allows my wife to continue to work while experiencing the rural lifestyle. While we run the property commercially it is not of the scale that provides sufficient funds to sustain us. I also have off farm income through an agricultural contracting service carting livestock and wool which supplements my income.

The friendships we have developed are in large part the result of the welcoming nature of country people around Goulburn. My wife and I have an enormous sense of place and this is amplified by the rural setting, the views and the sense of community. Our place has one of the most beautiful views on the Gundary Plains. Our house is built on a 721-metre hill and our westerly view extends over the solar land to the Great Dividing Range. The sunsets we experience are so varied and colourful they look artificial. It is like being on holidays permanently.

Our view, the landscape and our sense of peace will all be destroyed should the Large Scale Industrial Solar Factory be approved.

## **NOISE and NUISANCE**

Living in a quiet rural lifestyle area, we are rarely worried by man-made noise.

Noise is an unwanted sound. The noise of insects or the leaves rustling in the trees outside the bedroom windows at night are just sounds, they are not annoying. But a dog barking at night is an unwanted sound – it's a noise.

LightsourceBP has advised us, in an undated letter received in November 2024, that there may be times when noise levels received at our property at the north eastern end of the proposal on Kooringaroo Rd (R9 in map FIGURE 2.3) would exceed the Project's Noise Management Level of 45dB during the day. **Our bedroom is 150m from the boundary** with the solar land. In these circumstances the noise admitted to by Lightsource will become an actionable nuisance.

They also say they always base their modelling on a worst-case scenario, and they went on to say that their information informs us of how they are proposing to reduce and mitigate the impacts of noise during the construction period.

Lightsource say the construction noise modelling was undertaken in a conservative manner.

Sound requires a source. The source produces vibrations which cause pressure changes in the air. The resulting sound waves of pressure travel out in all directions from the source. The direction of the sound is influenced by the design of the source and the wind direction.

Decibels - the sound pressure measured in decibels (dB). Decibels measure the sounds people hear.

Lightsource is again seeking to deceive us into thinking the noise levels they produce are decibel levels. This is not correct. Decibels levels measure noise statistics, not real noise levels. The statistical numbers are not real and produce a much lower number and this does not take into account the spikes that occur when real noise levels are measured nor the real noise people hear. Spikes in noise can be typically 10dB higher than the statistical level.

While not taking into account that real noise levels are higher than those stated by Lightsource, their modelling predicts that our property is located within an area where some of the construction noise may be audible (>45dB). [ should be “will be audible”]

Our house and the rest of our property based on Lightsource’s modelling shows that their modelled noise result exceeds their limits in 6 of the 7 scenarios. The 6 scenarios start at month 1 and continue to month 25 of the construction period – therefore 2 years of a serious noise nuisance.

Why have Lightsource chosen >45dB? - Does this fit their model that on 3 scenarios their modelled noise does not exceed 10dB in their “exceedance level” when a 45dB threshold is used, but would exceed the 10dB threshold if the more realistic level of 40dB threshold was used, and therefore the 6 scenarios would exceed the 10dB threshold.

Our assessment suggests the chosen noise level should be as measured on the spot where the view photos were taken where our base level noise is 36 to 40dB with a 4m/s wind.

As per the Lightsource’s Spatial Risk Map, this computer model does not take into account the topography of the surrounding hills. The construction noise contour should be extended to the ridge tops of the surrounding hills as our residence is like an amphitheatre sitting on a 700m hill. Further, Lightsouce’s modelled noise result does not reflect the real life experience e.g. the noise of a 110dB rated chainsaw operating and cutting up a tree near the cattle yards on the proposed solar land near our house at 9.25am, 21 November 2024 measured 68dB at the spot at the house where the view photos were taken for Lightsource. The maximum modelled noise result for our house, R9 of the Table 6.28 Receivers Exceeding Day Time Construction NML, page 165 of the EIS Final, was only 64dB. This brings into question the veracity of Lightsource’s modelling and highlights the deficiencies in the modelling.

As for noise mitigation Lightsource says it has a Noise Management Plan (draft). It also says it has additional noise mitigation measures and they state that “reasonable and feasible general noise controls are proposed to mitigate such impacts”.

Lightsource says it will give advance notifications of upcoming works and potential disruptions via letter box drop and/or email and publish notifications on the project’s website and will undertake 3 monthly verifications monitoring to check noise levels (after the event). How does that mitigate the noise?? How does that make life more bearable for us landowners? You’d think after having built 5 solar farms that they have now sold to the Chinese that Lightsource would come up with something better than that. The fact that they can’t just shows how inappropriate the site is.

Apart from us humans at 400 Kooringaroo Road whose house is 150M from the site boundary having to wear noise suppression ear protection for 2 years during the hours of 7am to 6pm, our animals, especially horses and 3 of our dogs will be absolutely terrified by the

noise of the pile drivers – pile drivers when driving into granite rock will be in the 140dB range. Lightsource has not even considered this aspect of their noise pollution – it's more than a nuisance.

After construction there will be the long-term noise nuisance of ongoing operating noise (Inverters and Battery stations including each of their air conditioning systems along with the axis tilting mechanism) for up to 40 years. We have been told by a neighbour of the Lightsource solar farm at Wellington that we should not agree to an inverter near our house as the noise is constant and loud.

Lightsource has made no mention of compensation for the 7 families that they have identified as most severely impacted by noise nuisance. Two of those families have young children, one of the families has a member who works from home in a profession that requires peace and quiet and has Supreme Court timetables to comply with. During construction Lightsource should be providing adequate compensation to these families to enable them to re-locate for the two years so that the noise and distraction of the construction does not conflict with their work and their everyday life. Also, what do they propose to mitigate the noise impact on our animals?

The potential horrendous impact from noise, that Lightsource's report tells us we have to accept, is just another reason why the choice of this area to build a 666,000 panel, 7sqkm solar farm in the middle of so many lifestyle blocks is so wrong.

Noise of the level that Lightsource proposes conflicts with our enjoyment and ability to live where we live.

## **MITIGATION – NOISE AND VISUAL IMPACTS**

The noise mitigation measures proposed by Lightsource cannot, because of the location of the impacted landowners in relation to the sub-station, batteries, inverters and panels, be effective. This further reinforces why the site is not suitable for a large scale industrial development. Lightsource has said on page 167 of the EIS that "Lightsource bp is consulting with the affected landholders regarding the predicted impacts." This is simply untrue. They have never discussed noise with us at any stage and in fact told us that there would be little noise. They have also never discussed noise with the people on Windellama Rd who will be living within 300m to 800m of the sub-station.

There is no option for mitigation of the impact of the views of the industrial factory as it will have a high visual impact because of the topography of the chosen site, the size of the land coverage by the panels and the size of the sub-station and other infrastructure.

The photo-shopped images from the western side of our house, a residential only view is absolutely meaningless in a rural landscape where there are many viewpoints.

The photo-shopped images provided by Lightsource might have assisted us in moving a pot plant to block the view on our high rise balcony if we lived in the city, however apart from the exquisite views from our house, there are many beautiful views as we move over our block, including the southern end of Goulburn city and the War Memorial on Rocky Hill to

the north and the distant views to Covan Creek and Lake Bathurst to the south west. These views contribute to our sense of place and how our property is valued.

The topography does not lend itself to mitigation or blocking out the solar panels, Inverter or Battery stations as we overlook the solar panels and infrastructure. The solar land landscape is rolling hills leading down to Gundary Creek and its tributaries and our property has 4 hills over 700M elevation.

The scale of the proposed industrial site is out of character with the surrounding rural landscape. To highlight the sheer enormity of the site, it is the amalgamation of 3 previous rural lifestyle properties.

## **FIRE RISK**

With the increased fire risk of having a large scale industrial solar factory as a neighbour, I am concerned about my livestock and my neighbours who live on Kooringaroo Road.

Our house was rated as BAL 29 and was built to this standard. We are required to have a 30m APZ around our house.

Lightsource clearly have no understanding of the fire risk of living on a Plain such as Gundary Plains and the impact of fire behaviour fanned by strong winds and rising topography to the east which is linked to the Australian Bush.

Maybe Lightsource and its parent BP will be able to relate to what might happen to the 33 Kooringaroo Road residents, the Non-associated residences R67, R69, R68, R10, R70, R8, R9, R7, R6, R4, R5, R100, R84, R101, R85, R75, R102, R54, R18, R104, R26, R71, R28, R86, R105, R103, R33, R19, R2, R17, R23, R24. This could turn out to be BP's next Deep Water Horizon.

## **CONTAMINATION AND POLLUTION**

I am concerned that parts of our property may be contaminated by water run-off from the solar site. We have a number of areas on our property where water flows off the solar site.

As a livestock producer, I am required to assess the risk of my animals being contaminated.

Robust and credible research has been conducted by Stuttgart University that there is a distinct possibility that there will be leaching of solar panels. There is also the possibility of inverter or battery accidents which would lead to pollution. A copy of the Stuttgart University research is attached.

As an accredited livestock producer, I will have to ensure my livestock do not graze contaminated areas nor drink water that has flowed from the solar site. If this development is approved, I will have to develop a plan to address the contamination/pollution likelihood. No doubt there will be a cost involved. Is Lightsoure going to pay it or compensate me for having to undertake work that has been made necessary through no fault of my own?

## DECOMMISSIONING AND REMEDIATION

I am concerned that at the end of life of the solar factory we will be left with a toxic mess beside us which will be not only unsightly but will contaminate and pollute our property.

Lightsource only offers weasel words regarding a commitment to decommission. It is likely that Lightsource will not be the owner/operator of the solar factory when it comes to decommissioning.

The last owner will be a “Shelf CompanyName Australia Pty Ltd” with no asset backing and they will walk away from decommissioning as the current value decommissioning cost will be over \$50 Million according to the model calculator in the Renewable Energy Planning Framework.

The cost of decommissioning will far exceed the value of the land on which the solar panels and infrastructure are located, therefore the landowner will also walk away leaving the cost for the taxpayer or rate payer. It is therefore unlikely that a cleanup will ever occur.

Also, decommissioning does not include remediation. The remediation cost is likely to be very costly as the contamination from the solar panels leaching will be toxic and dangerous. While I am unlikely to be around when decommissioning and remediation is required, solar factory pollution and contamination is likely to be the next asbestos.



Lightsource development – Goolma Road Wellington NSW