

4 May 2021

**To: Mr Javier Canon, Department of Planning, Industry and Environment (DPIE)
Ms Nicole Brewer, Director, Energy Assessments, DPIE**
Cc: Mr Will Winter, Economic Development, Armidale Regional Council (ARC)

Dear Jovier and Nicole

Re: Tilbuster Solar Farm, SSD 9619

Further to our onsite meeting on 27 April 2021, we would like to confirm our opposition to the Tilbuster Solar Farm and submit additional concerns to those noted in our earlier submission dated 20 November 2020.

As previously advised, we were not notified nor consulted by ENERPARC or any other parties prior to the development of the Tilbuster Solar Farm EIS, nor at any time since the EIS was published. We understand this is also the case for other neighbouring properties, one of which the residence is near the Solar Farm and looks over the proposed development site.

We only became aware of the proposed solar farm after the closing date for DPIE submissions. We were advised of the proposed development by a local grazier. The DPIE accepted a late submission, however we feel our submission was rushed due to the short lead time and lack of opportunity to speak with ENERPARC personnel.

We believe that certain facts in the EIS, and on which decisions are being made, are false and that details relating to mitigating environmental, cultural, health and fire risks, are inadequate. The decision regarding the future of the Solar Farm will have significant negative impact on our property, other local landowners and the broader New England Region, including our local tourism industry, for many years to come.

Our property "Hilltop" neighbours "Annaleey", the proposed site for Tilbuster Solar Farm. "Hilltop" comprises 1600 acres of grazing country with a combination of plateau, undulating and hilly terrain. The property currently has two building entitlements, one of which has been developed and in which we reside, the other site pending further development. Under Local Government planning regulations, we are permitted to subdivide "Hilltop" into three separate blocks. At the time of purchase, we were also advised by Armidale Dumaresq Council (ADC), that a prospective proposal to incorporate an Agri/Eco Tourism venture on our property is in line with council regulations.

KEY ISSUES

1. Concerns about the EIS
 - a. Community Consultation
 - b. Proposal Description
 - c. Visual Amenity & Landscape Character
 - d. Environmental issues
2. Change of land use
3. Visual Impact
4. Further growth of industrial sites and infrastructure
5. Bushfire Hazard

6. Environmental, Cultural & Biosecurity Impact
7. Traffic & road safety
8. Foreign ownership of essential services
9. Economic Impact – Negative impact on Property Values
10. Increased risk of rural crime

1. Concerns about the EIS.

1.1 Pg xxi: Community & Stakeholder Consultation:

- a. We, along with other neighbours were not consulted nor did not we receive the consulting or planning notices, contrary to what ENERPARC have stated in their EIS.

We request to have consultation with ENERPARC along with access to the community consultation notes concerning the following:

- *Who was consulted?*
- *How many of the neighbours were involved in one-on-one interviews?*
- *How was it advertised?*

1.2 Pg xx: Proposal Description:

- a. The site is located on the intersection of two Transgrid lines - 132kV and 350kV, both of which pass through our property.
- b. The larger line 350kV is being used for this project. This line crosses the back of our property, close to our residence.
- c. Concern is that future developments may incorporate the 132kV line, which goes through the front of our property.

1.3 Pg xxv: Visual Amenity and Landscape Character:

- a. The EIS has deemed that there is no impact on the neighbouring properties and therefore no Landscape Plan is required. This is not the case and we do not believe due diligence has been taken in this area. We were not consulted nor did ENERPARC personnel come onto our property.
- b. The proposed site can be seen from a number of high vantage points on our property, sites which we propose to be included in our agri/eco tourism venture.
- c. Neighbouring residence is in close proximity to the proposed site and overlooks the solar farm.

If the development is approved, we request a Landscape Plan to be developed with ENERPARC to implement and maintain the landscape, with maturity of trees in the first three years.

1.4 Pg xxvi: Environmental Issues

- a. The EIS makes reference to implementing practices to mitigate the risk of water and soil contamination, soil erosion etc but only in generic terms.

We request further details on these mitigating processes, including detailed reference to mitigate the risk of soil and water contamination from cadmium.

2. Change of property use from agricultural and wilderness to industrial use

- a. New England High Country is renowned for its grazing land, natural beauty, rugged landscape and wilderness. Change of land use to incorporate an 800 acre commercial industrial enterprises requiring over 400,000 panels, large

powerlines, substation, 20 battery storage containers etc will impact the local region significantly - socially, economically, environmentally and visually.

3. Visual impact, glare & reflection

- a. Under local government planning regulations landholders are not permitted to have a galvanised iron roof on our sheds due to reflection concerns for planes and neighbours, however ENERPARC is permitted to put in over 400,000 solar panels with high level reflection and glare.

What is being used to mitigate the glare and reflection? We have been advised that the reflection covering applied to the panels does not stop the glare or reflection.

- b. The physical appearance of the 800 acre solar farm is in stark contrast to the current natural environment.

As noted above in 1.3.a, the EIS states that there is no need for a Landscape Plan? We dispute this based on the following:

- *The site is viewed from our property and from our neighbour's kitchen window.*
- *The construction of an 800 acre solar farm, including the infrastructure listed in 3.a, will have an extremely significant impact on the visual landscape in an area that is renowned for its natural beauty.*

4. Future growth & Powerlines

- a. The current proposal is a large scale solar farm across an 800-acre site.
- b. The investment is significant - \$150 M, including a new substation. Are there plans for the substation to be incorporated into future solar or wind farm developments?
- c. 132kV Transgrid line is currently not being used for this proposal. However with the potential for future development and subsequent increase in electrical output, we envisage a future need to upgrade these power lines resulting in larger towers at the front of our property. Both the 132kV and 350kV Transgrid lines cross our property. Our entrance road drives under the smaller line. The larger line cuts across the back of our property.

What is ENERPARC's future intention for growth at this site?

What environmental, economic and social plans are in place to manage the future growth of solar and/or wind power farms in our immediate area and the new England region?

Site size of the Transgrid Substation is 1ha. Will this be included under the DPIE's monitoring of the substation.

- *Can the substation be viewed from neighbouring properties.*
- *Is it capable of processing electricity from additional solar and/or wind farms, which may be added in the future or will it be at full capacity with the current proposal?*
- *Is there consideration of future solar and/or wind farm expansion and the negative visual, environmental, social and economic impact this would have on neighbouring properties and the local area's agri/eco tourism industry?*

5. Bushfire Hazard

- a. The proposed solar farm is in a high fire risk area. The surrounding terrain is heavily timbered and a fire at the site would quickly run into the hills and escarpment, posing a serious threat to our safety. In 2019, fires in our region showed the serious risk to our properties and this enterprise will increase this risk.
- b. It is our concern that battery storage infrastructure will exasperate the fire risk to surrounding properties and increase danger to fire fighters.
- c. Under local planning regulations, landholders in the vicinity of the proposed solar farm are required to undertake an extensive Fire Plan as part of their DA. Has ENERPRAC undertaken such a plan and where can it be viewed?

How does the solar farm, including the battery storage infrastructure impact on potential fire risk in the area?

- *What is in place to mitigate the increased fire risk from battery storage and the increased danger this places on local landholders?*
- *From previous developments, does this risk translate into higher insurance premiums for local landholders?*

6. Environment, Cultural & Biosecurity Impact

- a. What contaminants are in the solar panels and batteries? Do they contain lead and cadmium?

Cadmium is a known carcinogenic. It is noted that cadmium can be washed out of solar modules by rainwater and leaching from broken panels damaged during nature events eg hail storms. Is this the case?

The proposed site includes water ways, what risk is there that they can be contaminated by these chemicals?

What is in place to prevent soil and water contamination during the construction, operation and decommission phases?

- b. What obligations does ENERPARC have environmentally, to the following?
 - Impact on wilderness image – negative impact on agri/eco tourism
 - Disruption to native habitat
 - Bringing noxious weeds onto the property
 - Loss of agricultural land.

What are the specific mitigating processes that ENERPRAC are required to implement?

- *Will there be an ecologist on site for any tree removal?*
- *What is the carbon footprint of this development, including:*
 - o *Manufacturing of the panels and all infrastructure, including powerlines?*
 - o *Transporting all materials and infrastructure from the place of origin?*
 - o *Loss of groundcover that would normally absorb carbon?*
 - o *Removal of vegetation?*
 - o *Decommissioning of the site, including the removal and disposal of toxic, heavy metals and chemicals in the panels and batteries.*
- *Have carbon credits been purchased to offset the above?*

- c. This site is of significant indigenous cultural value. Pg xxiv Reference is made to Safeguards and Management measures being put in place to adequately address both direct and indirect impacts associated with the proposal. These include protection and management of isolated finds, artefact scatters, scarred trees and cultural trees within the Proposal Site.

The EIS did not address this matter adequately.

- *What is being put in place to preserve and protect the cultural integrity of this site?*

7. Traffic & Road Safety on the New England Highway

- a. The proposed Solar Farm site is located approximately half-way between Sydney and Brisbane on the New England Highway. The proposed entry and exit point on the New England Highway has limited line of site from the northern approach. As a national Highway, there is a high volume of B Doubles and general traffic, as well as local traffic, school buses from Guyra to Armidale and Guyra Tomato Farm traffic.
- b. There have been two road accident deaths close to our property entrance in recent years. We are located at the end of the overtaking lanes approximately 2 km from the base of Devil's Pinch. We have also witnessed a large number of near miss accidents due to speed, fatigue, impatience and poor driving.

We are extremely concerned the development will significantly increase traffic volume and collision risk, particularly during the 12 months construction period with vehicles turning into, and out of the site.

What mitigating factors are being implemented to reduce the risk of vehicle accidents?

8. Foreign ownership of essential services

- a. ENERPARC is a foreign owned company, with loyalty to their shareholders and members. In principle, we are not opposed to foreign investment in Australia but we are extremely concerned with the volume of foreign ownership of Australia's essential services, in this case electricity.
- b. Decisions are being made which will provide a foreign corporation with huge profits at the expense of local landholders and New England Region.

9. Economic Impact - Negative impact on neighbouring and local property values

- a. The visual impact – glare, reflection, buildings, battery storage containers, substation etc. will adversely impact on the property value on farms that neighbour the solar farm and view the infrastructure, inadvertently affecting the value of all neighbouring and local properties.
- b. Change in land use from agriculture/wilderness to commercial industrial use.

How will the negative impact on land values be compensated, including compensation for loss of income due to impact on agri/eco tourism ventures in the local area and reduced property sale values?

10. Increased risk of rural crime

- a. Due to the size of our properties, rural landowners are vulnerable to the threat of rural crime. The large number of itinerant workers on the solar farm raises the risk of unwanted trespassers and the potential of loss or damage to our land, equipment and livestock. This is not necessarily from the workers themselves, but from conversations they have with others in local hotels etc. regarding equipment, stock and property access.

What security measures will be put in place to protect the neighbouring properties?

We are not opposed to change nor are we anti-development. We understand the argument for alternative and more sustainable power sources, but we have serious reservations about this proposed development. As a neighbouring property, we are extremely concerned that there has not been adequate consultation with neighbouring landholders and the local community. The process appears rushed and risk factors brushed over, including cadmium contamination and disposal.

We dealt with Transgrid over a number of years prior to the construction of the large high-voltage powerlines that run across the back of our property. We have been significantly impacted by these lines. The process was a difficult and stressful experience, with communication poor and inaccurate. We were told Transgrid would maintain roads, undertake weed control, notify us when people are coming and going and put in place bio-security measures to prevent the spread of weeds eg wash-down bays for vehicles coming and leaving the property. This has not been the case. Other companies are now involved with the line, and the above measures are not undertaken.

As a result of this experience, we are cautious with these developments and the impact it has on the landowner and the local region. It is our experience, and that of many others along the power line, that energy development enterprises are extremely profitable for the developer, shareholders etc at the expense of the neighbouring properties and local region – the local voice is often discarded.

Thank you for your consideration and we look forward to the opportunity to discuss this matter further.

Regards