4 July 2018

Ms Homsey
Environment Assessment Officer
Resource & Energy Assessments
Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001

Attention: Director - Resource and Energy Assessments

Property: 909 Suntop Road, Wellington STATE SIGNIFICANT DEVELOPMENT 8696 – PROPOSED SUNTOP SOLAR FARM PROPERTY:

We seek to make a submission in relation to the Environmental Impact Statement (EIS) for the above development.

Our mixed winter crop and livestock property directly adjoins the site of the proposed development, sharing an all-weather access road, water easements and an elevated residence facing toward the proposed site. Historically, the two properties were operated as one.

The EIS does not specifically address impacts on existing agricultural land use on adjoining properties. Our principal concerns in relation to the proposed development are outlined below:

- **Increased risks and liability with fire**
  Normal agricultural operations on our property will be impacted by the heightened risks with fire. The EIS notes that the main risks of fire ignition are lightning and harvesting crops on surrounding properties (Section 6.9, page 181).

  The proposed development is on the eastern boundary of our land and our winds come predominantly from the west.

  Due to the inherent nature of harvest operations and necessary timing of harvesting for winter crops during normally high fire danger periods (October - December), there are unavoidable risks with harvesting operations. We are unable to modify harvest operations or implement mitigation measures to remove the risk of ignition and fire spreading to the development site without those changes adversely impacting on our business. Additional mitigation measures will result in higher costs, for example more fire fighting equipment, and/or reduced crop production on our property, for example by more livestock production or decreasing harvesting hours in the middle of the day or increased fire breaks between our crops and the proposed development. The increase in costs or decrease in cropping production will decrease our returns from our property.

  Other critical crop operations would also be potentially impacted, such as stubble management (burning, slashing and mulching).

  Advice from our insurer suggests that public liability insurance coverage may not be available for our property for fire or would have a significant loading making it unaffordable for our business. Even if we could afford it, which we expect we could not, our discussions with our insurer suggest we would be unable to obtain sufficient cover to protect us from a fire destroying the proposed development. Without insurance coverage for fire ignition from harvest, we would be forced to change our land use and cease crop production on the

adjoining lands. This will have a significant ongoing impact on the profitability of our business and reduce the value of our property.

The proposed asset protection zone (APZ; 15m) and set back from the solar panels (25m) is not adequate to mitigate the fire risks. Proposed use of only grazing to manage vegetation and fire fuel loads in the APZ not adequate to mitigate the fire risks.

The EIS, incorrectly in our view, dismisses any increased fire risk from the development. Due to the nature of the infrastructure, if a fire was to occur it would be more difficult to confine and extinguish compared to a fire on agricultural land. The infrastructure would reduce access to fire fighting equipment. The EIS states that the infrastructure will cover 472 hectares of the total 517 hectares on the site. With the solar panels representing the majority of this area, in a continuous, unbroken series for the most part. Unlike agricultural land, where access is relatively unrestricted and land use creates a mosaic of lower fire risk areas, the solar farm will have limited access for fire fighting equipment and a uniform, relatively uninterrupted area of moderate fire risk. This adds significant risk with fire to our operations.

- **Reduced crop productivity**
  Due to the increased risks with fire, it is expected that we will need to modify our crop operations and/or cease crop production in areas adjoining the development. It is also expected that other crop operations such as aerial spraying are also likely to be impacted by the development. This will have a significant ongoing impact on the profitability of our business and reduce the value of our property.

- **Reduced access to water**
  Our operations are reliant on access to water from a bore located on the proposed site. There is an existing arrangement with the current land owner and an easement to secure access and supply for this bore water.

  The development is expected to impact the access to this water, due to increased water usage during the construction phase and risk of damage to the bore infrastructure. Reliable access to sufficient water for livestock is critical to our operations, especially during summer and periods of drought. Reduced access to water poses an unacceptable risk to our livestock operations and will reduce the value of our property. This impact will be compounded by the fact that the other risks referred to above will force us away from cropping and into more livestock production.

  We have discussed this with Photon Energy who have indicated that they will make all reasonable attempts to locate an alternate water source and in the interim, preserve the easement access.

- **Increased salinity impacts**
  The proposed position of the sub-station is a known saline area. Disruption of the saline area is expected to lead to downstream impacts with higher saline water flows onto our property. Maintenance of deep rooted, productive pastures are critical to management of salinity in the Suntop area. The development will lead to the loss of deep rooted pasture species such as lucerne and it will be no longer possible to manage pastures for maximum productivity (and water use). Grazing management and pasture management (eg. weed control and fertiliser application) will be impacted due to the solar infrastructure and operations. This will lead to increased salinity impacts on our property which will in turn affect the value and productivity of our property.

- **Increased weeds**
  The proposed development will lead to increased weeds in the area and risk of spread to our property. The EIS suggests that weeds will be managed during operation of the development under a yet to be developed 'weed management plan' (Section 6.1.4, page 87). While grazing is proposed under and around the panels, it is expected that it will be impossible to implement effective management of weeds, due to the inability to adequately manage grazing pressure. Herbicide application is likely to be required in some areas, using products with long term, persistent soil residual activity.

- **Reduced land value**
  As a direct consequence of the development, our property value will be reduced significantly as a result of the combined effects of visual impacts, reduced crop and livestock productivity, reduced access to water for livestock and increased salinity. Visual impacts will occur with view points from the residence and most areas on our property. The aesthetic value is a significant component of rural property values in the Suntop area. The EIS acknowledges only a moderate/high visual impact for the residence, with no acknowledgement of impacts from key farm infrastructure and other areas on the property. There is no acknowledgement in the EIS of impacts of the development on the productivity, profitability and asset value of adjoining land.

  Additional impacts on our land value are expected as the site will be not be returned to its original agricultural potential. The EIS states that only above ground infrastructure will be removed. With the below ground portion of footings for panels remaining, it will not be possible to crop the site. The EIS suggests that the development will give rise to improvements in soil health, comprising both physical and chemical aspects (Section 6.6, page 87). This is unfounded as construction and operation will lead to soil compaction with machinery, herbicide applications will result in long term, persistent soil residues and no fertilisers will be applied to improve nutrient fertility. The inability to utilise the site to its former agricultural potential, will have an impact on the value of our land.

We are extremely concerned about the impacts the project will have on our current farming operation. Discussions are currently being held with Photon Energy about entering into an agreement around the future use of our land.