

In the EIS, Photon Energy attempted to dismiss concerns in relation to neighbouring land values by comparing the Maryvale solar farm development to a wind farm in USA:

The impacts of a solar farm on neighbouring property values has not been studied in-depth however there have been numerous studies on the impacts of wind generation on neighbouring property values in the United States (Hoen et al., 2010; Hoen et al. 2015; Vyn and McCullough 2014; OEH 2016). These studies found the impact of wind energy generation on neighbouring property values to be negligible. As solar farms, do not have the same impacts as wind farms the impacts on property values caused by solar farms are anticipated to be less than the impacts of wind farms. This issue has been addressed in Section 6.12.4.

To compare a wind farm in USA to a solar farm in Australia in terms of neighbouring land values is dismissive and inadequate. That mitigating responses such as this are acceptable in an EIS? Any conclusion drawn in relation to wind farms, cannot be reasonably applied to the proposal. There are just too many risk factors that potential buyers of adjoining land could certainly live without: electromagnetic fields, heat banks, micro-climate changes, fire risk, other opportunistic neighbours jumping on the bandwagon. Large scale solar farms are a new phenomenon and who would want to be exposed to the uncertainty associated with these developments? Visually they are ugly and if I had the choice between a farm adjoining or near a solar farm and one that isn't, I know which one I would choose.

**There will be 47 people visually impacted by this proposed development. Site selection is poor.**

**The land is mapped Biophysical Strategic Agricultural Land. Site selection is less than poor.**

BSAL land features quality soil and water resources and is assumed to be the best land capable of sustaining high levels of productivity. BSAL is naturally fertile and highly productive and can be used for intensive agriculture such as cultivation. (Main Document 6.4.2 pg 120)

BSAL land, the best land for primary production. There are other sites in the Wellington area under transmission lines with land less valuable to the economy and more suited to blanketing in solar panels.

The Proposal, is not expected to impact or sterilise surrounding land use (including farming of BSAL land) from routine agricultural practices during construction, operation or decommissioning. (Main Document 6.4.3 pg 123)

Photon Energy can't guarantee this land will not be impacted or sterilised over the 25-year lease. Why let them have it? This land has a purpose and it certainly isn't energy generation!

In the NSW Government Large Scale Solar Energy Guidelines Nov 2017, key considerations for large solar site selection includes:

Areas of Constraint

important agricultural lands, including Strategical Agricultural Land (both critical industry clusters and biophysical strategic agricultural land), and land with soil capability classes 1, 2 and 3. Consideration should also be given to any significant fragmentation or displacement of existing agricultural industries.

The soil capability in the Maryvale area is Class 2 Important Agricultural Land. This land is not considered an **opportunity** but rather a **constraint** in terms of large solar farm site selection. Where is the constraint in proposing 375 hectares of large-scale solar development on Important Agricultural Land, soil capability class 2?

5.5.3 State Environmental Planning Policy (Rural Lands) 2008

State Environmental Planning Policy (Rural Lands) 2008 aims to identify Rural Planning Principles to assist in the proper management, development and protection of rural lands for the purpose of promoting the social, economic and environmental welfare of the State. This Policy encourages the identification and protection of natural resources, having regard to maintaining biodiversity, the protection of native vegetation, the importance of water resources and **avoiding constrained land**. (Main Document pg 75)

Photon Energy states, "Schedule 2 of this State Environmental Planning Policy does not list any land that is considered State significant agricultural land, therefore this site is not considered to be State significant agricultural land." (Main document pg 76)

This policy does not list State significant agricultural land **but rather**, expects those planning under this Policy to **identify** what **is** State significant agricultural land. Any land mapped BSAL, soil capability 2 is State significant agricultural land and should not be used for energy generation purposes but rather agricultural purposes only. It should be protected! There is an expectation that these aims will be supported. To do otherwise would simply be paying lip service to this planning instrument.

S94 of the EP&A Act enabling Council's to levy for public amenities and services as a consequence of development.

Dubbo Regional Council appreciates that the MSF won't trigger S94

Contribution requirements and suggested developing a community

benefit fund in lieu of a S94 Contribution. (Main Document Table 4-3 pg 51)

Once again Dubbo Regional Council has lost out. None of the renewable companies in the area have chosen to contribute. Millions of dollars lost for the region, yet the proponents of these developments will make enormous profits. They will downgrade existing infrastructure and we will be expected to contribute to road upgrades, 'just to get those trucks in.' Community Benefit Funds are a consolation prize and Photon Energy has reneged on one of those already.

Health concerns associated with exposure to electro magnetic fields has not been dealt with in the EIS, nor 'heat island' effect resulting in temperatures around solar farms being regularly 3-4 degrees warmer. Huge implications for adjacent landholders. Where are the studies concerning EMF and 'heat island' effect? I'm guessing if it didn't come up in community consultation it doesn't matter! It is unlikely that Photon Energy would have brought it up.

Environmental Impact Statements are flawed in that the human factor cannot be mitigated out of the process and is never mentioned. Where I live a couple of fellows have been at it for almost two years; competing for developments and carrying on and all the while bringing the community down with them. The hate that Bodangora Wind Farm stirred in the community on the northern side of Wellington was palpable. Proponents of these projects never mention this in an ESI.

**I would like a response to the issues I have raised in my submission.**

