

I wish to make a submission, by way of objection, concerning the SSD application. The grounds for my objection are specified below and based on points documented in the appendixes, available on the public exhibition Department of Planning and Industry and Environment's (Department) Major Projects website.

Appendix A- Secretary's Environmental Requirements

- I wish to object the way that I have had very little consultation throughout the planning process. I can see little evidence of how the development has been amended in response to concerns raised with OSF in an email dated:
- Alternate transport modes are used on Silverton Road. These include walking and cycling-no mention has been made of this in any of the documentation.
- The traffic noise and dust generated on proposed haulage routes including Silverton Road, should the Gara Road be impacted by flood, has not been mentioned. I have livestock who graze in the paddocks either side of an unfenced road.
- I am curious to know what form the community consultation will take during peak construction.
- I am a 'sensitive receptor' to the proposed arrays on the Eastern Boundary bordering Silverton Road. They are way too close to our property. Regardless of screening and noise mitigation and negotiated times of rest throughout the day. I am simply not happy for this development to proceed on this lot.
- I request greater perimeter compensation- aside from the proposed scattered trees along the eastern boundary along Silverton Road. We would need a dense shrub of trees planted in order to totally block out the high visual, security fence topped with barb wire.

The NSW RFS recommended that the SEARS include a requirement to address planning for bushfire protection. The EIS stated that the majority of the proposal site is not identified as bushfire prone land on Armidale Regional Council's bush fire prone land map. However, there have been grass fires there in the recent past. Providing a 10 metre Asset Protection Zone is not adequate planning for bushfire threats to the facility, nor does it address potential hazards for, fire fighters water supplies or proposed emergency management procedures. When the photos were taken, we were experiencing a severe drought. The environment is not currently a '*low fuel environment*' (EIS p.263).

Appendix B- Proposal Plans

- The Road
'Access Road' does not state for light vehicle traffic only. I have been assured of this by the project manager, however, this is not mentioned in the proposal plans.
- Solar Panel Section 28, in my view as a sensitive receptor, is way too close to the Silverton Road and dwelling Lot 45 adjacent to the proposed utility scale solar farm.

Appendix C-Community Consultation Plan

As a community member who is a landholder in exceptionally close proximity to the proposed development, I am known as R5, I object to point 3 on page 6. I do not believe that the consultation plan has allowed people to contribute to decisions that affect their lives.

To Date:

- I have had one phone call-advising of the proposal in the initial phases of the proposal.
- August 2019- I sent an email seeking clarification regarding some initial concerns I had regarding the development.
- August 2019- I received a reply directing me to the Department of Planning website- not answering my questions.
- July 2020 I made a phone call to address some concerns, which I then emailed.
- I attended a community meeting at Kent House and sent my feedback form in August 2020. (There was so little space on the feedback form that I had to attach my concerns regarding screening and potential access via Silverton Road in an email.)
- I received a thank you for your correspondence- generic email with none of my questions/concerns/ objections being acknowledged or answered.
- September 2020- received an email from Oxley Solar farms inviting me for photos or offering to visit my residence- I did not respond as I saw little point when my 2 previous emails with concerns had not been directly answered and I did not want another meeting, all I wanted was my concerns to be answered.
- 19th March 2021- received an email re. 2nd information session. Which I attended and some of my questions were still not all answered, eg I was seeking clarification on what types of panels were used fixed or tracking and my question could not be answered.

I hardly feel as though this is evident of 'inclusive' consultation. The lack of consultation has not developed 'trust' between the parties involved.

- I have not been asked to collaborate and have not felt as though my participation has been sought on regarding elements of the project design.
I object to the fact that the consultation, as per page 11 in my opinion, has not been based upon involvement, collaboration or empowerment. I would say I have felt that I have not been involved, I have had little collaboration and I certainly have not felt empowered.
- This appendix also states that for minor impact I will be informed and consulted. I am seeking clarification as to how I would be consulted throughout the process as an adjacent neighbour? As the consultation to date has been very limited and I have received no direct email correspondence addressing concerns I have raised aside from the offer of a visit, which, as mentioned above I did not accept.
Point 7- I see very little evidence unless you are in 'the know' of how the broader community has been relayed information about the project.
Table 5-1 indicates that there would be direct communication with adjacent landholders and that there would be clear communication of mitigation strategies. I feel that a few red dots on a map 'screening' is far from adequate. (These dots are not represented in the legend on the map provided by NGH). Whilst this was something we requested, there was no communication with us about this. Page 18 states that there would be follow up with consistent information. We have had little follow up-aside from a generic email thanking us for expressing our concerns with the development, in particular that of solar panel arrays 28 and 24 on Figure 4 'The Project' p. 5 in the project overview.
- Page 19 states that the developer would touch base at major milestones. I have not found this to be the case. The detailed assessment proposal also indicates that

all issues have been identified and addressed by the project, we raised several and whilst a few of our concerns have been addressed this was not done so in consultation with us. I would imagine the vegetation screening would be a case of seeking our feedback, this has not happened and we would have appreciated more input into this. I do not feel as though my concerns have been monitored or effectively evaluated.

Appendix D

- Page 13 does show site access along Silverton Road. Unless the road is fenced this is not feasible. We have been advised that the road will be for light vehicle access only, however, we were also advised that our road may be 'temporarily fenced'. The EIS p. 36 states Silverton Road may be used for light traffic only and despite what we have been advised at consultation meetings, p.72 of EIS states that 'Allowances of up to 60 daily light vehicle movements for workers to access site'. I can only assume these *light vehicles* will not be using Silverton Road.
- Any change to *normal* traffic flow will impact our agricultural productivity and create more dust, which will impact on our lifestyle and family home. There is conflicting information as we have been advised our road will not be used as part of site construction, however in the Biodiversity Assessment report it states "Site access along Silverton Road to Gara Road." We seek clarification on this and if this is the case mitigation will be sought in the form of fencing and sealing of parts of the road.

Appendix E-Landscape and Visual Impact Assessment

I object to solar arrays 28 and 25 being developed as the '*scenic quality and integrity of our landscape*' will be impacted upon. I also believe that we will have a moderate visual contrast to the surrounding landscape- not low as indicated in the documentation. We currently have picturesque view of paddocks and farming fences. The visual impact of a 2.3m high security fence topped with barbed wire is certainly not visually pleasing and reflects an industrial development as do the size of the panels and the steel structures which will support them. This would require significant screening and so much more than displayed on the map, published by NGH. (**Please note:** the screening represented by small red dots along the eastern boundary fence, are not even documented on the legend.)

I object to the fact that our existing landscape will be altered and become dominated by solar arrays and an industrial appearing utility solar farm.

Yes, there are a low number of people impacted by this, however, I am one and I rate visual impact as moderate to high. This is my home and my lifestyle. I am one of the community members who walks along the road, passing the corner block, housing solar arrays 28 and 25 regularly. Additional planting will be required. Even though the nearest panel is 546m from our residence, it is less than 200m from our property/workplace. I would therefore be requesting further consultation for supplementary planting. (Table 5 Overview of dwelling within 1000m of project.)

According to point 7.1.3 the screen planting is to be undertaken in consultation with landowners, as already stated, we have had very little consultation and want so much more than 'scattered trees'. (p.34)

I also object to the proposal of 'scattered groupings of trees' in the screening. The trees would need to be planted in rows to provide adequate screening. I would not want the security fence to be visible. We would request a wide band of native plantings as per p.63 of the EIS – similar screening proposed for the from Oxley Wild Rivers National Park. These

trees will take years to grow and this needs to be a priority. If they were scattered, yes as per the proposal, they would tie in with the existing plantings, however, a utility scale solar farm, instantly changes the natural look of the environment, for at least the next 30 years. Therefore making a 'tree lot' would be far more desirable and effective and hide a 'non-natural' utility scale solar farm environment that has been proposed. At least reducing the visual impact and scenic quality may be partly achieved.

Out of curiosity, I would also like confirmation of how the screening would be maintained and who would be responsible for this for the 24 month period as indicated in the appendix. What happens when we enter another drought and the trees die? To be effective, the screening would need to be maintained for much longer than the proposed 24 months.

Appendix F-Hydrological and Hydraulic Analysis

Point 6.2 Flood Management. In an emergency, namely a flood, access would be via Silverton Road. We have, as previously stated, been advised that this would be for light vehicle access only. We would object to this being used for extended periods of time if the road were not fenced as our livestock would be at risk of impact and we would also request the road be sealed parallel to our home.

Appendix G-Aboriginal and Cultural Heritage

I note that trees CT6 and CT7 on Silverton Road would need high visibility fencing placed around them to avoid *indirect impacts* and yet I object to the fact that our property will not have temporary fencing put in place to avoid *indirect impacts* on our livelihood-our grazing stock. One can only assume if these trees require protecting with use of a barrier, that traffic, as a result on the construction, will increase on Silverton Road.

Appendix H-Noise Assessment

- “ *Noise emissions from the construction phase of the proposal were predicted to exceed the construction noise management levels at the nearest receivers in limited situation*”, (Penzo and Tonkins pg19). Our family business generally demands us to work outdoors and as we are an identified receiver location how will the consultation regarding noise management and respite periods be conducted?
- We object to the fact that acoustic barriers are not yet set in place nor appear on any maps/plans supplied and request that at a minimum the distance between the source in panel areas 25 and 28 and us 'the receiver' is doubled ensuring they are removed well away from Silverton Road or preferably moved away altogether.

Appendix J-Traffic Impact Assessment

- We object to the fact that the total impact will be over 10 years and we would like our property road fenced to avoid any impact to our livestock. Please note at the first consultation meeting we were advised that a temporary fence could be erected, however, at the last consult meeting we were advised that Silverton Road will not be a main access point, however, that it is a public road and would be used. We object to the fact that if it will be used for light vehicles throughout the construction phase, for 'visitors' to look at or for the ongoing maintenance over 30 years that consideration needs to be given to fencing and sealing a section of road running parallel to our house.

- The fact that despite Silverton Road 'resembling' a rural road and a minor access road it has been reported to have more flood immunity than the Gara Road, implying that the Silverton Road could be used more than we have been made aware of in the proposal.
- Despite the fact that no direct access will occur from the Silverton Road, what happens if the site and construction workers do not, as instructed in their brief, access the site via Silverton Road rather than Gara and form the main access point Waterfall Way? At various stages of construction, I can only imagine there could well be several visitors travelling to the site along Silverton Road. Hence, my objection to not ensuring livestock on this road are kept safe and our home having to deal with increased traffic- dust and noise.