

I am writing to express my opposition to the requested changes to the FRV conditions of consent. As a neighbour we still have all the same concerns around loss of trees, impact on habitat, weed control, fire, flooding, dust, loss of agricultural land, and the impact on Orange Grove Gardens business and the value of our home (which will overlook the Substation). But these are some specifics in relation to the proposed changes.

From our perspective the suggested modifications are a slap in the face. They made promises during this approval process, gained approval, and are now seeking to go back on what was promised with no respect to us as neighbours just to meet their needs and to make their access more convenient/save them money.

Substation Height Change

During the initial consultation we objected consistently to the location of the substation. There are three transmission towers within the footprint of the proposed development. They could locate the substation next to any one of the other towers and it would have less of an impact on us. They advised us that following extensive drawings and planning and consultation it was deemed that it couldn't go anywhere else. They told us it cost them a significant amount of money to have the substation moved 50m on the plans. They told us it had to be precisely where it is due to "harmonic balance" within the grid. They told us they were "experts" in solar farm development and construction. They told us they had consulted extensively with TransGrid. In a conversation with TransGrid we were told that prior to construction of the substation they would have to consult with the neighbours and the community because that is who their customers are. They said they were tendering for the contract to install the substation and following the outcome of the tendering process if they were successful, they would be in a position to review the location and consult with us. This has not happened. FRV and TransGrid both had access to these plans, they both apparently are experts in their fields this is a \$350-\$400-million-dollar project, and no one noticed that the substation was 15 metres too short! (That is like looking at a 7-storey building and realising that it should have been 12 storeys' high, it's not a small oversight it is massive). This to me seems to be a case of we will make it look like it fits behind the tree's for now and we will change it later. I have contacted the Standards Australia to see if there have been any changes to the standards which would account for this "oversight" and will let you know when they respond. Remember FRV brag about having already had multiple large scale solar developments connected to the grid so they and their technical departments know what standards they are supposed to meet! In relation to this the images they use for the photo montages are warped and consist of a photo taken from our balcony looking down and then a photo from the western corner of our front yard. They have been stitched together (if you zoom in you can see the white post in the middle of the yard isn't matched up. They aren't true representations of the view and do not represent what the visual impact will be. In addition, the plantings that they are supposed to complete prior to construction have not commenced. There has been no discussion or communication about this either.

Panel Height

When they moved the panels away from Orange Grove Gardens, we specifically asked how they could take away 200,000 panels and not lose any capacity. They told us the technology had advanced and they were now able to produce the same amount of power from less panels. I had a discussion with Cliona about this and I said "if the technology has changes that much in 12 months imagine how advanced it may be in 2/3 years you won't need half the land. Why can't you wait". She said they "had to do the best they could with the technology that was available to them now". I asked her if there was any other change in the panels, she told me there was not! everything else was the same they were just more efficient. Now I see that they are also indicating that the gaps between panels may have to change to accommodate the changes in panels (something I assume they are incorporating in this requested approval because they have mentioned it in the submission for change). They knew prior to planning approval that they were using different panels; they knew the specifications etc. and

were approved based on the information they provided. If they have now found a cheaper or more convenient product or they failed to update their specifications in their submission for approval to do the same job that's too bad. They made their plans and commitments and should be held to them. The increased height will also mean that again the plantings will not outgrow them for longer. This will have an impact on Orange Grove Views and the view of all neighbours as well as wind and heat effects. On their FAQ Page they state:

Q How high will the panels be?

A Panels will be installed on low-lying structures expected to be around 4m in height. When the panels are stowed horizontally, they will be approx. 2m in height.

This increase in panel size won't just affect height for 30-60 minutes a day as they suggest it will affect the overall height of every row of panels all day every day and when in the stow position because they will have to raise the height of the racks to accommodate the new panel dimensions. Also as indicated they will likely have to reduce gaps between panels.

Temporary Transport Route Changes

If you look at the FAQ page they say:

FRV have made practical and positive changes to enhance the design to help mitigate neighbours' concerns where practicable. Updates to the design have included a review and relocation of site access points.

They state: Q How will the site be accessed?

A The main site access is proposed from the north-eastern corner of the site from Benambra Road via the Olympic Highway. The access was changed to this location to protect the amenity of surrounding neighbours, with this main entrance now over 1.4 kilometres from the nearest dwelling. Two auxiliary access points are proposed to cross Schneiders Road. All access points will be manned along with appropriate safety signage.

So now that they have approval, they want to change the access to place they moved it from to "protect the amenity of surrounding neighbours". My question is why? Is it because it's inconvenient to FRV, TransGrid, Involved Landholders? If that's the case, why should we be the ones that have to cop it on the chin. If it's because they can't construct the road due to wet soils, landholder crops or it will create the need for temporary fencing again why should we be the ones inconvenienced? They knew what they were building they knew what the transport route was so why are they trying to change it after approval. This is not their first rodeo! This is again something that I spoke directly to Cliona about, and I asked because the Substation was going to be built by a third party would they be held to the same rules as everyone else or would they just do whatever they wanted, and we would have to put up with it. She assured me that they would be expected to show the same "respect" and follow the same rules. She did say that once the Substation was constructed that TransGrid would access it via a gate opposite us but that would be when it was operational and would only be for maintenance/repair.

In addition to my above concerns, I have not had a great experience with FRV to date. As far as communication goes so far, we have had very poor experiences with the project team. The first investigative works commenced, and we did not hear from them until after I had contacted the department to ask what was going on. ***When they did contact us, they chose to have someone print a letter telling us of the works, backdated to a couple of days prior and then taped to our front gate.*** (Despite having our email address, postal address, and phone numbers). We only heard from them after Rob Beckett contacted them. 3/4 weeks later it was announced that he had left the department and joined their team.

Then we noticed people doing investigations along Benambra Road again no notification. I went down and spoke to the people doing the surveys. I asked what they were doing they said roadside surveys. I ask who they worked for they said they couldn't say they were just asked to do the surveys. I asked

if it was to do with Solar, they said they didn't know. They were working all along the western end of Benambra Road by then which concerned me because it felt very much like when NGH had completed their initial surveys. I called council and spoke to Colin Kane to ask if he knew why they were doing surveys and specifically why they were surveying the western end when it was outside the scope of their approval, and he said he hadn't heard anything from them and was not aware of any surveys being conducted at that time. I've been led to believe that FRV then contacted council later that week and advised that they were seeking to change their access. We then received notification 10/08/2021 that there would be roadside surveys conducted (this was almost 2 weeks after the surveys had been completed). Then on 21/09/2021 I again noticed works going on and had to chase them to find out what was happening. They advised that they deemed the works low impact so chose not to advise us. I have highlighted that as neighbours whether they think it's low/high impact doesn't matter if it creates anxiety and stress for us and others passing by. They have since agreed to notify us of works whether high or low, but we will see how long it lasts.

I am also concerned that they are wanting to commence construction of the substation despite not yet having a power purchase agreement in place (to my knowledge). It is my understanding (from other LSS companies) that they cannot secure connection to the grid unless they have sold at least 50% of their power. Yet to date we have not heard of any agreements for the sale of the power. This appears to be something that companies such as FRV announce. FRV also assured us through this process that they do not sell their assets. They manage and maintain control of their assets throughout the life of the agreements however we have seen a few articles indicating that FRV are trying to sell multiple Australian Solar projects. Whether this is true or not it concerns me as I have found little evidence that this company is as good as they profess to be.

I discovered that Cliona left the project and moved back overseas, so I sent her an email querying some work that had commenced on the site. Had I not done this I am not sure how long they would have waited to let us know that she had left (I have been told that she had left a couple of months prior to my email). Following this I contacted Rob Beckett from DPIE who followed it up for me and got back to me advising that I could contact him or the DPIE team anytime I had concerns. 3/4 weeks later he was introduced as Cliona's replacement. I have worked in Recruitment for over 15 years and would find it hard to believe that any recruitment to a senior position would have taken less than 6 weeks. This to me represents a huge conflict of interest. Rob was one of the main contacts that we had within the department. We along with many others in our community had conversations with him we would not have had with FRV and we would have expected them to be confidential. Coming from a senior position within the DPIE he also has the inside information on what modifications would and would not get approved and how to get negotiate aspects that may be hard to navigate. This represents a significant disadvantage to us as neighbours. Then when you consider his existing friendships, relationships, history within the DPIE. It's hard to see how this doesn't work to his and FRV's advantage. From the outside looking in this is a huge moral and ethical issue for this project and for anyone in the DPIE assessing any/all requests associated with it.

I ask that when these requests are assessed that they are rejected. These were commitments made by FRV to mitigate the concerns of us, our neighbours and concerned community members, changes that FRV promoted as going above and beyond for all concerned and now they want them modified. Please hold them accountable.

Many thanks