

Size/Location

- Scale is far too big for this location at 1317 Hectares
- Our farm has 7kms of immediate frontage
- Our property will be surrounded in an L shape
- We have frontage on both east and western sides of the development
- We have 3 homes neighbouring Our home – R24, Parents - R29 and R32
- The development is surrounded by far too many nearby neighbours with families and children
- 1,100,000 solar panels will have huge impact and risks
- Development is too close to towns
- We have leased the project land proving its capability
- We do not oppose renewable energy just this location

Production Impacts

- Will have difficulties moving sheep between our 2 properties east and west of the development along Cummings Road through construction zone
- Loss of 800 hectares of leased farmland to our business
- Loss of profit to our business
- Loss of hay contracting to our business
- Loss of hay and grain crops to our clients
- Loss of significant tonnages of hay supporting drought affected areas of NSW
- Potential loss of employment to our employees
- Safety of our employees is at risk
- Heat Impact
 - Heat research inconclusive
 - Massive 7km frontage will be affected
 - No mitigation of potential heat
 - Tree lines not offered for heat and small tubestock that take 10-15 years to grow will not work with no density
 - Only mitigation would be a full bank of earth to the height of the panels covered in trees
 - Increased heat in September/October and could destroy crops
 - We do not wish to be guinea pigs - more research is required on massive scale.
 - Why is research not conclusive – is this to suit the solar industry
 - Compensation needs to be paid if heat impacts neighbouring land
 - Heat monitoring equipment needs to be installed and independently monitored to assess impact
 - [Clean energy Council has collated research](#) and acknowledges concerns
 - 30 Metre break is insufficient when research confirms impact to 700m
 - Cornered paddock would have double the distance of impact
 - Vegetation proposed to be eaten by sheep and therefore heat impact will not be mitigated
 - Precautionary principle should be applied

- Dust Impact
 - Dust impedes herbicide efficacy
 - Dust can affect plant health and photosynthesis
 - Increased weed growth due to herbicide efficacy will reduce crop production
 - Resistant weeds will encroach
- Livestock
 - Metabolic impacts from construction noise as per [Research](#) may affect productivity
 - Fertility may be affected by stress levels from construction noise and activity
 - Hearing discomfort occurs in livestock at 90-100 decibels
 - Ear damage may occur over 110 decibels (solar piling equipment specifications 107-117 decibels)
 - Massive construction disturbance may cause animals to injure themselves on fencing if startled or scared.
 - Lambing and calving occurs in paddocks adjacent to the development
 - Mismothering of calves and lambs may occur due to being frightened and disturbed
 - Calf and lamb deaths may occur
 - Livestock health is at risk
 - Livestock need a calm environment
 - High frequency noise may impact livestock as per research – inverter noise is high pitched ringing/humming sound
- Aerial agriculture – spraying, spreading may be inhibited by glare

Contradictions

- Contradicts the [Rural SEPP](#) objective of this direction is to protect the agricultural production value of rural land.
- Contradicts [ministerial direction](#) to protect rural land at items
 - Item 1.2 Rural Zones objective of this direction is to protect the agricultural production value of rural land.
 - Item 1.5 Rural Lands objectives of this direction are to: (a) protect the agricultural production value of rural land, (b) facilitate the orderly and economic use and development of rural lands for rural and related purposes
- Contradicts the [Greater Hume LEP](#) item 1.2 – 2 – b particular aim to (b) to protect and retain productive agricultural land
- Contradicts the NSW Solar Guidelines - how is 1317 hectares constrained?
 - 4.2 Key Site Constraints
 - Agriculture – important agricultural lands, including Biophysical Strategic Agricultural Land (BSAL), irrigated cropping land, and land and soil capability classes 1, 2 and 3 . (The proponent is suggesting land is class 4 under land soil capability mapping however this is untrue by definition. There is currently poor quality land soil capability mapping held by government and by definition in the Office of Environment and Heritage The land and soil capability assessment scheme Second approximation this land proposed for this

development is most predominantly class 2 –3 as advised by our agronomist). [Rural Capability Mapping](#) determined this land to be [class 1](#).

- Visibility - there is an elevated home
- Biodiversity – site contains Billabong Creek & Back Creek and waterway all with riparian areas. Threatened and vulnerable species on site.
- Residences – numerous homes in the area, many new homes, many families
- Natural Hazards – Billabong Creek Floods, Land mapped as bushfire prone
- Contradicts NSW Right to Farm Policy
- Contradicts the [Riverina Murray Regional Plan](#)
- Contradicts the [NSW Renewable Energy Action Plan](#) aim 2 to Build community support for renewable energy
- Not in renewable energy zones determined by AEMO

Consultation

- Zero contact with parents Neville and June Feuerherdt at R29 even after being asked to do so and completed feedback form
- Information day should have been to help neighbours but was not
- Information day was set up to provoke conflict
- Proponents need to listen to objectors not sell the development with misleading information
- Minimal answers given at Community information day – repeatedly told would discuss issues in neighbours agreement, this did not occur
- Neoens change of tact with consultation is a calculated marketing tactic.
- Kitchen table consultation is not inappropriate targeting community benefits scheme
- Only 1 Community information session held is not enough
- No response to emailed questions after numerous requests
- Community engagement specialist used selective targeting for community engagement – eg Numurkah solar farm email & visit
- Promised information has not been provided
- EIS and marketing contains misleading information
 - Disruption payment \$200 - \$300000 misleading
 - Sheep production – comparison of cropping land in this area to sheep production in drought affected areas is not accurate.
 - Wildlife connectivity is not “very limited” as quoted
 - Use unusual wording like “ a minimum number of tree lines” what is the number?
 - They just copy and paste information from one development to another

Conflict in our Community

- This development has caused serious conflict in our local communities
- Our family feels like a bomb has gone off in the community and we are in the centre
- Community Benefit funds should not be used to leverage acceptance of a development

- Michelle Croker from Neoen advised that some members of the community described the community benefit fund as a bribe
- Neighbouring Landowners see Community Benefit Funds as inappropriate and funds should be spent on mitigation or to alleviate losses to those affected not to the community with less impacts.
- Concerns of community in the area around the development are high.
- Conflict has extended to children in schools
- We have been unable to visit our local stock and station agent
- Fracture will increase if the project goes ahead
- Construction disruption payment is buying acceptance
- Neoen highlight high levels of concern to neighbours in the marketing material but no focus on resolution.
- Neighbours feel that the town communities are being played against neighbours.

Agriculture

- Class 4 Land Soil Capability is wrong
- Rural Capability of Class 1 is correct
- Greater Hume have confirmed this land will be mapped as Important Agricultural Land and therefore constrained by Solar Guidelines
- We know the capacity of the ground to be good productive cropping land
- This area has reliable rainfall and produces when others struggle
- It has yielded well in the past 3 seasons of our lease
- We have produced enormous amounts of hay and grain
- We have grazed between cropping seasons
- The affect of drought has increased demand from this area
- Our lease has proven what this land can achieve with the right farming technologies
- There will be a significant loss of agricultural business
- There will be a loss to agricultural employment
- There will be a loss of food production
- Livestock producers requiring feed are suffering from feed shortages and massively increased prices
- Post farm gate benefits of production will be lost
- Economic Data is significantly underestimated by at least one third
- Sheep grazing is misleading – is only vegetation management for short periods
- Neighbours are not guaranteed sheep grazing
- Sheep grazing will be on weeds as seen at other solar developments
- Sheep need hay which will be lost from cropping
- Wont be able to spray properly with panel infrastructure
- Will not be able to spread fertiliser properly
- Pasture will be unable to be sown effectively
- Biosecurity issues are a concern for neighbours
- Weeds will encroach on neighbours if not managed
- Silver Leaf nightshade is a significant issue on this property and is difficult to control
- Hairy Panic will be an issue if not controlled and will lead to fire issues
- Land does not need resting, current farming practices effectively manage the health of the land
- We are worried about the impact to our business
- Short term jobs for construction should not be at the long term expense to agriculture

- Will sheep get cancer under panels from ELF-EMF, WHO says is a carcinogen
- Dubbo video with sheep grazing shows minimal ground cover with stock being fed hay
- Independent agricultural assessment is required.

Visual Impact

- Partial screening of 1 row of tubestock trees is a joke, there is no tree line to parts of the east and south of our house
- Small tubestock trees takes 10-15 years to grow and will do nothing, if they survive
- The massive area of this industrial view will be daunting
- Solar infrastructure is extremely confronting
- Why should I have to look at this industrial site while I work for the rest of my life
- We will see the development unscreened from our kitchen bench
- We are surrounded by the development and there will be significant views
- The low risk rating is incorrect, it should be high
- Photo montages are not a true reflection of the visual impact and have optic effects
- There is no indication of view to the front of our house where will drive every day
- The notion that solar panels have a low visual profile is rejected
- Amazing rural outlook turned to an industrial site.
- Vegetation screening inadequate and insufficient
- Proposed industrial landscape changes will cause neighbours mental health issues
- Loss of peaceful and tranquil outlook
- Family members will not want to walk or work where we can see solar panels
- Greater Hume is supposed to be the shire to "Live a Greater Life".
- Neighbours may move at a loss and one already has
- There is minimal natural screening along Cummings road – needs full visual mitigation as may cause car accidents

Fire

- Assessment of fire impact should form part of approval process not just a condition of consent
- There is serious concern about increased fire threat to neighbours and nearby towns
- Development land mapped as bushfire prone near Culcairn and Walla Walla towns
- Bushfire Prone Land is near multiple treed riparian areas and is in close proximity to heavily treed Billabong Creek, Back Creek stock reserve, Walla Gum Swamp, Culcairn Gas Pumping Station, pipeline and Culcairn Tip and Geelong Leather
- Rural Fire Service (RFS) brigade members will not enter the site as are not HAZMAT trained or equipped
- WHS issues such as electrocution, entrapment and toxic exposure will prevent RFS members from combating fires inside the facility
- Culcairn South West Fire Brigade has serious concerns about this development and has not been consulted
- The nearest RFS is not 12kms away
- Our brigade - Culcairn South West will not enter and are the closest immediately neighbouring the development – other local brigades have advised they also will not enter
- NSW Fire and Rescue in Culcairn, Henty and Holbrook and are the only HAZMAT responders with others in regional areas of Albury and Wagga. RFS members are not HAZMAT trained.

- Location and massive size will not allow for quick response with minimal HAZMAT available
- Neighbours are at increased risk if fires are only fought by RFS from outside the proximity of the development
- Aerial response takes time
- Hairy Panic accumulation well known in this location will accumulate around the panels and high security fencing may also be a major fire management issue. Other fires in this area have been caused by hairy panic.
- Increased Anxiety due to recent fires nearby and local brigades were affected by loss of brigade member
- Increased Anxiety locally due to previous Walla Gerogery Fires causing significant loss
- Nearby Gum Swamp is an extreme fire risk.

Environment/Biodiversity

- The area is a haven for wildlife particularly in the riparian areas of the Billabong Creek and waterways through and around the property
- Habitat displacement of wildlife will occur on the site from hollow log removal
- Habitat displacement will occur from construction activities and loud noise
- Waterways nearby the site have significant frog populations, migratory birds and many species of flora and fauna including some threatened and vulnerable species, these should not be jeopardised
- 99 Paddock trees to be removed is not acceptable and will affect wildlife
- Our landcare riparian projects on the Billabong creek and the waterway near our house seem worthless if construction occurs in the immediate area
- Of massive concern is the unnamed waterway close to our home that leads from project site into our lagoon will endure loss of wildlife and migratory birds including brolgas, cormorants, herons, black swans, pelicans etc
- Birdlife includes many wedgetail eagles and owls
- Wildlife is not limited, we have had – goannas, lizards, snakes, echidnas, kangaroos, black wallabies, wombats, fish in the creek, yabbies, frogs, possums, squirrel gliders, hares, bats, believe we have seen a curlew, have flame robins, brolgas
- Have cormorants, herons and other water birds inc brolgas pelicans and black swans
- NGH were asking local landowners about birds and appeared to have little knowledge (they were looking for owls in the middle of the day)
- We don't believe the time given could adequately allow environmental assessments on an area with such environmental value
- We query whether appropriate environmental studies were conducted at the right time of year
- Dry conditions will have an impact on studies and will not truly reflect wildlife in normal years where waterways and dams are full
- Environmental Offsets do not save our local area
- Moving hollow logs to another area is disgraceful

Waterways/Drainage/Flooding

- The Billabong Creek suffers from major flooding and has had numerous events
- Significant flooding occurs on the Hope Farm property proposed for development and on our neighbouring property at Roseview
- Culcairn SES Facebook confirms significant flooding information in our area and levels

- In times of Flood water course is changed and can flow through the Hope Farm property on the southern side of the road
- Each flood is different depending on conditions
- Hay sheds and grain storage on our property Roseview can be significantly flood impacted and immediately neighbours development - changes to flood could cause impact to our product.
- Flooding changes water course and cuts sheds from Roseview house bringing substantial debris and causing damage wiping out fencing
- Flooding on our property in 2010 caused \$162,200 worth of damage with loss of 215 sheep, flood changes may cause increased stock losses
- Flood issues are being understated by the company and concerned that changes may cause increased flood effects to our property
- No local knowledge has been asked about the flooding impact to this area
- There should be no development on the northern side of Cummings Road due to the flooding impacts

Economics

- Huge area will cause a significant loss of agricultural production
- The economic data grossly underestimates the return from agricultural land
- The productive nature of land in this area increases returns
- Drought actually increases the value of returns in our area
- Estimated return this year will be approximately \$1650 per hectare and therefore the estimate revenue is only two thirds of what we have achieved.
- Employment figures are underestimated from our calculations
- Agricultural employment is dependant on what is being undertaken on the site
- Flow on employment to agricultural business is significant in our local area and region and is underestimated
- Indirect impacts from the loss of the annual agricultural cycle needs to be considered
- Flow on effect of on costs to agricultural businesses is massive and not adequately addressed
- Flow on effects to food production needs to be considered
- Multiplier is too low
- Short term benefits should not be at the long term expense to agriculture – Development will create a Boom and Bust Scenario
- Established agricultural jobs should not be replaced with solar jobs
- Solar jobs will be predominantly regional and wider
- Construction companies will bring teams of specialised contractors
- Majority of trades in our local area are already busy

Roads/Traffic

- We will have increased risk to ourselves and workers when shifting stock and machinery along the road and between properties
- There will be increased risk to our family
- How will we cope with noise, dust and road pressures from 300 passenger vehicle movements and 100 heavy vehicle movements during peak construction
- Over 6 school bus trips on our road every day will put children at risk, waiting and crossing road with large number of vehicle movements

- Extra vehicles on road will increase road repair financial impact to Council – will ratepayers fund this, will other projects not occur due to road damage caused by this development
- Cumulative impact on Weeamera Road is massive with Walla Development
- Increased collision concerns on Olympic/Benambra Road intersection
- This amount of traffic past Steve & Leah's home very close to Benambra road is ridiculous – they will not be able to breathe and their house will be disgusting
- How will they stop car vehicle traffic coming down Cummings Road
- Delays on Cummings Road Crossing will affect our business
- We will have difficulty moving stock through cummings road crossing
- Worried about road impacts to Cummings Road which already needs significant repair at the eastern end
- If trucks come from north down Hume Highway will they use single lane Culcairn Holbrook Road already considered with risks (has had black spot funding) – increased danger

Noise

- Our rural area enjoys a quiet peaceful lifestyle which will be destroyed
- How are we supposed to tolerate the noise of pile driving equipment at 107-112 decibels for 18 months when we live so close
- Do we need double ear protection when working nearby like the solar workers
- How will our farm workers be affected by noise when they are working in the paddock
- How will the company advise when noise will be close
- How will we tolerate the inverter noise is high pitched and humming constantly
- Why should we have to hear the BESS at night when it is currently quiet
- We think the noise calculations are incorrect using only 1 piece of equipment when there will be many
- Cumulative impacts of many noises should be calculated

Hazards

- Is it appropriate to have a massive battery storage facility so close to homes and towns
- Fires from the BESS could cause bushfire and create a hazardous situation that RFS cannot deal with
- Is it appropriate that BESS is near bushfire prone land
- This facility should be in a less built up area
- Can the hazardous BESS be near the gas pipeline
- If not safe this development should not be approved
- The hazard assessment does not address that the development is on bush fire prone land
- The hazard assessment refers to RFS members that cannot deal with hazardous and toxic situations
- Concern about leaching of chemicals with waterways so close
- Would toxic smoke require evacuation of nearby neighbours and towns in the event of a large catastrophe
- Where is the safety management study for the gas pipeline, this should form part of the approval process
- Will electrical interference affect the gas pipeline creating an additional hazard

Social Impacts

- Anxiety of unknown for families, health, cancer, environmental degradation
- Mental health from massive landscape change
- Anxiety of flood and bushfire impacts especially after recent bushfires
- Destruction of relationship
- Community fracture and conflict that will increase if this development continues
- Business relationship breakdown
- Loss of future opportunities for young farmers
- Stress on children
- Affects on education
- Family breakdown
- Post traumatic stress caused by conflict
- Suicide

Electricity

- This project should not be considered if not needed for to meet supply demand
- How does the 7 year wait for connections affect this development
- Why should landowners go through such stress for a development that may not be able to connect if there is insufficient capacity
- Cockatoos are prolific in this area and we have been told they eat the wires causing damage
- Developers should be directing such extremely massive developments to AEMO zones
- If we can send power overseas why cant we put power in the desert
- Government planning is required to further assess already identified renewable energy zones in more appropriate arid and less productive areas
- This area is not in a renewable energy zone as identified by the Australian Energy Market Operator
- An opportunistic approach of targeting existing transmission lines on flat land should not be the driving factor for renewable energy projects
- Great opportunity for renewable energy projects exist should the Wagga Wagga to South Australia interconnector be constructed.
- New technology such as hydrogen could make solar obsolete, how can the long term be justified.

Sustainability/Waste

- How can the company assure recycling of the waste, will we be left with a wasteland
- How will we be assured no waste will end up on our property
- What plans are in place have in place if we have a catastrophic or natural disaster that damages infrastructure. How will chemical leaching be avoided.

Climate Change

- Climate impacts have the greatest affect on food production therefore cropping land should be protected
- If we cant produce food we will have to import causing bio security and financial risk
- The do nothing argument is not valid, nobody is saying do nothing, the benefit of appropriate location ensures both energy production and agricultural production

- Communities suffering from long term impacts of drought would benefit from solar development

Water Usage

- Concern that dust mitigation will take huge amount of water and only 4 trucks per day will not be sufficient in dry months
- Culcairn quarry has not assured non potable water, if requirements are above that assured by Council what will happen
- How is the water metered, will the usage of large amounts of water jeopardise other town water supplies
- How will continue dry weather without run off affect water availability
- How will the slow running stand pipe cope with the required water

Cumulative impacts

- Should Walla and Culcairn developments both be approved the cumulative impacts of all issues will be exacerbated
- These developments are too close together to both be approved
- Benambra road and the Olympic Highway would suffer considerably and be an increased risk
- The loss of agricultural land would be significantly greater and have a huge affect on local business including our own as hay contractors

Other

- Will NBN, UHF, Mobile Phone, Television reception be affected by the development. Some of these are required for safety in our business
- How can the company change the use of the land to industrial to suit Financial Investment Review Board Requirements when they say they are retaining agriculture
- What happens if change to industrial does not happen and purchase falls through – does this affect development and size
- Lost opportunities for young agricultural people of the future, many kids around here are keen and have a future in agri that they may not have in the other areas

Remediation

- There should be a financial guarantee provided to ensure remediation of the land will occur
- If the company becomes insolvent they cannot be held responsible and should this responsibility transfer to the landowner there is no guarantee of their financial capacity to fulfil remediation requirements
- How can removal of infrastructure to only 500mm deep be allowed, the land should be fully remediated to its original state including repair of the soil.
- How will the removed trees be remediated? The property will be bare.

Vermin

- We will suffer from increased vermin such as kangaroos on our side of the high security fencing.
- Rabbits and foxes will have a harbour particularly along the creek with no access and control of vermin.
- Locusts and mice plagues will be more difficult to control.

Insurance

- We cannot get insurance to cover the infrastructure worth over \$600m
- Our business should not be at risk and the company should provide full indemnity
- Negligence is not a clear issue and the choice of the proponent to house this massive development here should be at their own risk