

From: [Paul Lalich](#)
To: [IPCN Submissions Mailbox](#)
Cc: [Andrew Scully](#); [Madeleine Ryan](#)
Subject: Glanmire Solar Farm project (SSD-21208499) - Fitzsummer Pty Ltd [HWLE-MATTER.C0187470.1002900]
Date: Tuesday, 19 December 2023 4:47:56 PM
Attachments: [image001.png](#)
[Response Submission to IPC \(19.12.2023\).pdf](#)

Dear Commissioners

Please see **attached** correspondence.

Kind regards

Paul Lalich
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Our Ref: PNL:ACS:1002900

19 December 2023

Dr Sheridan Coakes
Commissioner (Panel Chair)
Independent Planning Commission
Level 15, 135 King Street
SYDNEY NSW 2000

Dear Commissioners

State Significant Development Application SSD-21208499
Glanmire Solar Farm
Site: 4823 Great Western Highway, Glanmire (Lot 141 in DP 1144786)
Response Submission on behalf of Fitzsummer Pty Ltd

We refer to the Commission's Statement dated 14 December 2023, which sought public submissions on the following new material, by 20 December 2023:

1. the Applicant's Response to the Commission's Request for Further Information, dated 12 December 2023 (***Applicant's Response***); and
2. the DPE's Response to the Commission's Request for Further Information, dated 12 December 2023 (***DPE's Response***).

Fitzsummer has considered the above responses and makes the following further submission. This submission has been prepared, and is to be read together with, Fitzsummer's submission dated 8 December 2023.

Setbacks

Fitzsummer's primary submission remains that the Development should be refused given the unacceptable impacts on adjoining rural and residential landholders. In the event that the IPC is minded to approve the Application, then there must be no impact on adjoining landholders. All mitigation measures are to be applied within the boundaries of the Site.

The DPE's Response at Questions 2 and 5, confirms that the Department considers that additional buffer distances could be implemented via a condition of consent, requiring the Applicant to ensure the solar arrays are setback from the property boundary by at least 30m, consistent with the *2022 Guidelines*.

Fitzsummer submits that close consideration of the composition of the boundary setback is warranted, with the component parts needing to be clearly specified in any condition of consent. Whilst the proposed increased buffer called for by DPE is supported generally, for the reasons set out in our earlier submission, a 30m buffer is inadequate.

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Whilst Fitzsummer maintains that the impacts of the Development are sufficient to warrant refusal of the Application, it reiterates that a **minimum 50m boundary setback** is required. In the circumstances, this distance would provide improved bushfire separation, as well as an additional area for enhanced vegetative screening.

Insurance

Fitzsummer is concerned that the responses from the Applicant and DPE appear to diminish and dismiss the very real problem of obtaining insurance cover to manage the risk presented by fire from cropping activities on adjoining land impacting the solar farm.

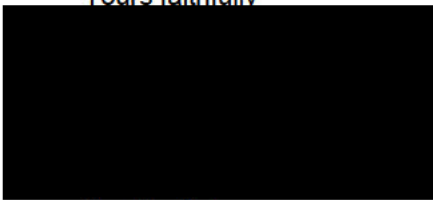
Several speakers made it clear at the public meeting held in Bathurst on 30 November 2023 that the potential insurance burden is significant, and will have serious implications for the viability of adjacent farming operations.

This concern is the subject of ongoing consultation between the DPE, the Australian Energy Infrastructure Commissioner and the Clean Energy Council. The absence of a concluded position should not provide a basis for the Applicant to avoid its responsibility to mitigate this impact.

Fitzsummer reiterates its request made in its submission of 8 December 2023 that the Applicant be required to explore all opportunities to obtain insurance cover which would protect Fitzsummer in the event of damage caused by fire emanating from the Fitzsummer Land. No additional insurance burden should be placed upon adjoining landholders. The determination of the Application should be deferred, pending the outcome of these enquiries.

Fitzsummer reiterates that a 50m buffer within the boundaries of the Site would provide improved bushfire separation. Fitzsummer is also of the view that a 50m buffer *may* assist in enabling cost effective insurance coverage to be obtained. In this respect, the Letter of Insurance Risk, prepared by NLT Insurance Brokers, suggests that fire exclusion areas of up to 60m may be necessary to mitigate fire risk (pg.5-6). Fitzsummer reiterates that all mitigation measures should be within the boundary of the Site, and should in no way burden adjoining landholders.

Yours faithfully



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