

Our agricultural business is a mixed farming operation - encompassing sheep, cropping and hay production located at Receivers R08, R33 and R09. This land is a business asset and also where we live. We strongly object to the proposed Culcairn Solar Farm (SSD-10288). Whilst there have been some changes to the proposed project, they are still outstanding issues and concerns which have not been sufficiently addressed or resolved.

The site selection for this proposal is based predominantly on cleared level land and availability to the transmission network because that is the cost effective option for the developer. The location of transmission lines should not be the driving factor in the placement of large scale developments. AEMO's Integrated System Plan identified the best locations for potential energy zones in NSW. This proposed development is not in a NSW Government - Renewable Energy Zone.

Our agricultural business is highlighted in green on the site plan below. We are going to have a 6km border boundary to this development.

R33 is a triangle shaped farm. It will be bordered on 2 of the 3 sides by panels. The remaining side (which fronts Weeamera Road) is the proposed transport route for all construction vehicles. The nominated Site Access point is right next to our farm access entrance. In order to continue our current agricultural practices we need to move livestock and / or machinery between R33 and R09 daily.



⊠ Entry / Exit. Gates

1 10 20 40 60 75m



spire

Neighbours at R24 and ourselves at R33 will have our agricultural business bordered on two sides by an L-Shape configuration under the Developer's current plan. At a minimum, we request the following removal of approximately 360 hectares from the development site being: Lot 1 DP 171815, Lot B DP 972054, Lot 73 DP 753764, Lot 86 DP 753764, Lot 72 DP 753764, Lot 71 DP 753764 and Lot 70 DP 753764. There needs to be an improved configuration of the development plan to alleviate multiple boundary borders to adjoining landowners.

The size of this proposed development is far too large. The development footprint of 892 ha is twice the size of the Walla Walla Solar Project and nearly 3 times the size of the Jindera and Glenellen developments. There needs to be a significant reduction in the size of this project.

### **Cumulative Impacts – Walla Walla and Culcairn**

The Walla Walla Solar Development is less than 1km from the proposed Culcairn project. This solar cluster will have a combined development footprint of 1,313 ha. The two projects are far too close in proximity to one another. Both projects have nominated to use the same traffic route. Irrespective of construction occurring simultaneously or independently - the impact is either compounded or the time frame prolonged for the same residents.

If both projects are approved, a maximum of 495 vehicle movements per day for a construction period of 16 to 20 months will subject the same residents geographically, to the strain of construction with double impacts of noise, dust, traffic and disruption to humans and animals. The daily cumulative traffic movements on Benambra Road would increase by 1,078%.

	<b>Walla Walla Project</b>	<b>Culcairn Project</b>	<b>Cumulative Projects</b>
Development Footprint	421 ha	892 ha	1,313 ha
Construction Period	16 – 20 Months	16 – 20 Months	
Predicted Vehicle Movements Per Day	200 Light	150 Light	350 Light
	45 Heavy	100 Heavy	145 Heavy
<b>Total Vehicle Movements Per Day - Benambra Road</b>	<b>245</b>	<b>250</b>	<b>495 Vehicle Movements</b>
Current Vehicle Movements Per Day - Benambra Road	42	42	
<b>Daily Percentage Increase</b>	<b>483%</b>	<b>495%</b>	<b>1,078%</b>

### **Community Benefit Sharing**

The level of 'Community Benefit Sharing' is disproportionate to the proximity of the site. Those closest to the development will be most affected - especially during 16 to 18 months of construction:

- Adjoining and near landowners = zero benefits
- Local towns in Greater Hume = medium benefits
- Albury and Wagga Wagga = most benefits whilst being furthest away from the development – no view, noise, dust, increased traffic or general disruption.

There is nothing built into the Development Consent that protects our 'Right to Farm' – to spray our crops, to burn stubble, to continue normal farming practices. Our land provides a buffer to the development for the benefit of others.

We have no guarantee our property values won't decline. A valuation of neighbouring properties should be undertaken at the cost of the developer prior to commencement, after construction and at adjoining landowner's request. Compensation, in the difference of value should be payable if the proposed development results in a decrease in land value. The selection of property valuer should be at the discretion of the adjoining landowners.

## **Energy Context**

The DPIE Large-Scale Solar Energy Guidelines are neither policy nor legislation. The Department's website says the guideline *'provides information on the planning framework'*. There has been a clear lack of planning for these large developments. There are no parameters defining how far from the nearest town these developments can be built. There are no parameters defining how many residents / receivers can live in a close proximity to a proposed site. There are no parameters about how close multiple developments can be built from one another.

Agricultural land is an important asset which we need to protect for the purpose of producing quality Australian food, fibre and fodder. Using productive agricultural land for large scale renewable energy developments is a misuse of land, given there are other less arable land options available.

Throughout the Riverina Murray Consultation Report 2017-2019 and Riverina Murray Regional Plan 2036 a repeated theme is the importance of agriculture to the regional and to the State.

***'Agriculture is integral to the success of the economy and a major force in the State. The Riverina Murray makes the largest regional contribution to agricultural production in NSW (\$1.4 billion)' p 4.***

## **Hazards and Fire Safety**

The DPIE - Development Consent states the Applicant must ensure that the development *'is suitably equipped to respond to any fires on site including provision of a 40,000 litre water supply tank fitted with a 65mm Storz fitting and a FRNSW compatible suction connection located adjacent to an internal access road'* (p 12). Our household water tank alone holds 26,000 litres and we have an additional 26,000 litre tank attached to the carport. A 40,000 litre water tank is extremely inadequate for a development of this size given the bushfire prone land classification.

## **Visual Impacts**

5.2.47 ... *'the Department considers that there would be no significant visual impacts on surrounding residences and receivers, and the rural character and visual quality of the area would be preserved as far as practicable'* (page 26)

'As far as practicable' is not a measurable parameter. The proposed development is not in keeping with current agricultural surrounds. With a development footprint of 892ha how could there not be significant visual impacts?

The rural landscape needs to be maintained for the full term of the development through construction and during operation. A visual screening of 99% around the entire perimeter of the project site with defined vegetation screening of minimum 6 rows of visually dense trees, with upper, middle and lower coverage - to the height of the solar infrastructure (approximately 4 meters high) would improve visual impacts. Where a visual screening cannot be achieved to the satisfaction of adjoining landowners then an earth bank be constructed.

## **Traffic Management Plan**

As previously stated our main property entrance to R33 is next to the Developers 'Site Access' located on Weeamera Road. To continue our farming practices we need to be able to move stock between R33 and R09. All major infrastructures for shearing, yarding, loading and receiving stock via truck transports are located at R09.

The Traffic Management Plan does not include provisions for adjoining landowners to move livestock and agricultural machinery along the roadsides bordering the development. There are no conditions of consultation with adjoining landowners, especially during the concentrated period of construction.

Our once cohesive community is no longer. This project is not for the betterment of the community - it's for the betterment of the Developer and their shareholders and would be better placed elsewhere.

Michelle Pumpa