

## Castle Doyle Solar Farm Action Group

### Objection to the Oxley Solar Farm Development

#### SSD Development -No 10346

**This Project erodes social licence it is clearly not within the Public Interests and therefore not within the Communities Interests.**

**This Project is inconsistent with Objectives of the NSW Environmental Planning and Assessment Act 1979.**

#### **This Objection confirms 10 principles evident to the Community's assessment**

- The fragility of SSD planning pathway has been easily influenced to the domination of the *'convenience of connectivity'* development factor over the *'socio-economic wellbeing of a local community'*.
- That procedural fairness must be the hall mark of any effective public law framework.
- The importance of meaningful community consultation throughout the development process based on full inclusion and openness.
- That the decentralisation ambitions of any energy transition without shared strategic planning is devoid of social licence and is destined to fail.
- That a cornerstone of any intergenerational equity ambition must be Australian ownership retention of Australian agricultural land.
- National Parks, such Oxley Wild Rivers, are places of immense public interest. They present for the preservation of the national environment -they protect endemic species and places of importance to the regional Aboriginal People.
- That large scale solar and storage rollout is still early days - many of the risks and therefore liabilities associated with life-cycle analysis are yet to be fully assessed -project developers, project owners, consent authorities and local government authorities need to adopt an abundance of 'precaution' in exercising approval.
- That developers need with complete transparency to table their development credentials and underwrite their financial creditability.

**This Project should never have traversed the Planning Development Pathway to the point it has - the obvious points of review where passed at Scoping Meeting, SEAR and EIS lodgement.**

## Introduction to Objection

Castle Doyle Road Action Group (herein 'the Group') – is a community action group – formed as a voice to strongly oppose the State Significant Development (SSD) application to develop a large scale solar facility and associated energy storage facility on a site associated with the Gara River Station 14 kms east of Armidale directly off the Waterfall Way. This development is identified within the Department of Planning Industry and Environment (herein "DPIE) as the Oxley Solar Farm Development (herein 'OSFD'). As this Objection will confirm -the project introduces an unacceptable development proposition compounded by the 'tick the box' of the State Significant Development (herein SSD) planning pathway. A clumsy 'tick box' development pathway which this Objection submits significantly erodes the very fabric of social licence the NSW Governments covets for its energy transition and particularly the REZ rollout.

The Group's Objection will confirm assessment errors within the planning process, as to how this project was allowed to traverse as far as it did. Based on the rationale introduced hereunder, if this DA is to precede to Consent it introduces matters of judicial review based on denial of procedural fairness and erosion of the basic element of public interest inherent in planning law. We believe this outlook, together with the poorly posed merit arguments cobbled together in the 'cut and paste' Environmental Impact Statement (herein 'EIS') confirm DPIE's only course of action is to action the following **Key Recommendations**;

- **Key Recommendation A**; strongly recommending to the Consent Authority that the **DA should be rejected; and/or**
- **Key Recommendation B**; the current DA is now withdrawn, and any future development interest is **the subject of fresh Application Process and is the subject to Community Consultancy Committee action** as so approved by the Minister.

The Group's submission will leave little doubt that this DA is fundamentally flawed. No amount of improvised 'band-aiding' will induce for the Community an *ecologically sustainable development* (herein 'ESD') consistent with the objectives of the Environmental Planning and Assessment Act 1979 (herein 'the Act'). This conclusion is confirmed through the analysis and recommendations hereunder;

### **A Lack of Procedural Fairness;**

The Planning Pathway appropriately invites through public exhibition -comment/support/objection from the public as to the development. This of course is consistent the principles of natural justice, and prudent public law as reflected in the Objectives of the Act.

The Group wishes to table two issues arising from the Planning Pathway and the DA which induce for the Group 'a lack of procedural fairness<sup>1</sup>'. This issue induces through obvious construction of relevant public planning law (the Act and Regulations) issues of Public Interest. **These are tabled at A1 and A2;**

## **A1; Identification of Developer Credentials**

The Developer's identity and the reputational credentials for a State Significant Development are very much in the public interest. They therefore draw on DPIE's duty to afford the public and the specifically the impacted community requisite procedural fairness in terms of the opportunity to fully assess the Development and its environmental impact. Identity and credentials are two sides of the same developer coin -they go the integrity of development, quality of development, bankability of the project -on construction, compliance and requisite recommissioning commitments. All very much issues of some pertinence to the immediate community and to the broader public interest.

1. **Failure to adequately identify the Developer** – this should have been a threshold issue during the Scoping Meeting -the fact that this developer had progressed through a 'tick box' planning exercise on Wollar Solar doesn't count. It had no objectors and probably was 'right-placed' non contentious and thus out the way.

The Scoping Report and the EIS both offer completely inadequate description of the Developer as to their identification and importantly their credentials -financially and technically. They report; *"Oxley Solar Development (OSD, ACN 629 954 329); a developer of utility-scale solar generation projects. OSD was founded in 2018 in Australia as a subsidiary of Solar Megawatt Holdings Pty Ltd to specialise in renewable energy developments, particularly solar projects. They take a pro-active, quality controlled and relationship-driven approach to their activities.*

*The company's dedicated management team is highly experienced in transmission network connection planning, renewable generation development and operation, and renewable project financing. The team has extensive experience in developing and operating utility-scale renewable generations in Australia and internationally..."*

1. There is no evidence offered as to OSFD's Utility scale solar generation **development credentials**.
2. On at least four occasions in 2019, as part of what the Group believed to be part of the period of consultation OFSD were requested to provide details as to;
  - Who they were Officers what was their background, what was their residency status Who were Senior Management, Who and what technical expertise did they bring to the Project, what was the Financial Credibility of the organisation? In the absence of no consultation and no obvious physical presence, all information provided by the Developer was questionable and a mystery?
  - These requests were made to Mr Bruce Howard GM OFSD by email on 4 occasions between September -October – These Emails are attached at Annexure A.
  - In order to communicate the gravity of the Group's concerns – personal surface mail letters were forwarded to the Directors of OSFD at their ASIC identified addresses –

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<sup>1</sup> Administrative Decision Makers must accord procedural fairness to those effected by their decisions. High Court of Australia -re Saeed v Minister for Immigration and Border Force. HCA 40 – 2015

these Directors happened to be also the Directors of the Hong Kong entity Megawatts Holding Pty Ltd – These Directors present as **You Li, Ye Han, Lixia Hou** -all Chinese born nationals -which in context raises obvious questions. We attach a copy of the ASIC current documentation Annexure B

- DPIE will appreciate this identity induced concerns for the Community as to compliance with the Foreign Acquisitions Takeovers Act 1975. Accordingly, the circumstances as the best the Group understood them were referred to Federal Jurisdiction -the ATO to confirm potential FIRB breaches. This referral is still outstanding.
  - All of this concern was clearly tabled for the OFSD's information and comment. No comment was received. The concern was exasperated by the fact that OFSD didn't offer a physical address -but rather a mailbox in Haymarket CBD and all contact was directed through a web-based email account.
3. **Identity -Reputation** is of pertinence to the Community and in the public interest. Concern was on several occasions communicated to DPIE. Requests were made through the Minister of Planning and Adam Marshall's New England's Office **for GIPA Act informal intervention** as to any notes and communications associated with the alleged Scoping Meeting. Details as to identification and reputational of the OSFD Developer. **There has been no response from DPIE or the Planning Minister's Office as to the processing of this GIPA request.**
4. In the light of the context outlined in Points 1,2 and 3 above **obvious procedural fairness challenges** arise not only for the Community but also for the other key stakeholders charged with the responsibility of offering by SEAR request assessment comment.

4.1 The OFSD has set out an elaborate Community Consultation Plan as an attachment to **the Scoping Report attached at Annexure D**. The Consultation Plan seemingly an NGH 'cut and paste' set out Consultation Principles as follows;

*"Important community engagement principles for a project include:*

*"... Openness – combats assumptions and misinformation.*

*Inclusiveness - consultation should be diverse and representative, not responding only to the most vocal stakeholders.*

*Effective communication – requires trust between parties and tools appropriate to the task. A communication plan – clarity about what is being undertaken:*

- *Inform: one-way communication to deliver information about the project.*
- *Consult: two-way communication to seek input into the project.*
- *Collaborate and involve seek participation in elements of the project design and implementation.*

*Early rather than late communication - to maximise engagement opportunities. Accountability – monitoring and evaluation to ensure consultation aims are being achieved... " <sup>2</sup>*

**Question 4.1.1** How could the Community take seriously the required procedural fairness, that these Communication Principles were going to **be prosecuted in any bona fide way**

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<sup>2</sup> Extract from OFSD Community Consultation Plan June 2019

when the Developer refused to step out of the shadows and honour ‘openness and inclusiveness’?

**Question 4.1.2** -How could the Community in the absence of *openness and inclusiveness* **fairly and properly assess** the Developers claims at **development capability** without demonstrable evidence as to experience?

**Question 4.1.3** - How could the Community in the absence of *openness and inclusiveness* **fairly and properly assess** the Developers **financial capability** to complete the development and operate the facility?

**Question 4.1.4** – How can the Community in the absence of openness and inclusiveness fairly and properly assess the Developer’s **commitment and capability to implement and manage the Consolidated Mitigation Measures?**

**Question 4.1.5** -How can the Community in the absence of *openness and inclusiveness* **fairly and properly assess** the Developers **commitment and capability to recommission** the site at the end of project life?

**Question 4.1.6** How can the Community **fairly and properly assess** DPIE ability to enforce any conditions of consent against an ill-defined Proponent?

The Development documentation makes reference to participation in the New England REZ. As is understood the recent policy/law the NSW Electricity Infrastructure Investment Roadmap/Act (herein ‘EII Roadmap/Act’) requisites eligibility and merit criteria to be considered for long term energy service agreement. It is difficult to comprehend how this OSFD project could qualify under the Planning Act and not be potentially perceived as eligible or sufficiently meritorious pursuant to the EII Roadmap/Act.

The Community are entitled to ask the question why to do we have a ‘two tiers’ standards for projects. The Governance which is being underwritten by the State requiring eligibility whilst the Planning Law promotes for a lower standard. The system could produce a consented project which is rejected by the proposed Consumer Trustee.<sup>3</sup>

### **A.1.1 Recommendations**

- I. DPIE needs to establish to the satisfaction of the Community **some obvious developer transparency**. *Who are OSFD Pty Ltd, who is Megawatt Holdings Pty Ltd, what is their development experience, what is their financial credibility necessary to close, construct and operate the project, who will own the development asset, what is their post development strategy and development and operational capability?*
- II. DPIE needs to establish with appropriate transparency the nature of the transaction between the Host Landowner -Gara River Station and the Developer OSFD Pty Ltd; and
- III. DPIE needs, based on the facts obtained by I. and II. above that any necessary compliance pursuant to Foreign Acquisitions Takeovers Act 1975 has been secured.

## **A 2. Project Description**

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<sup>3</sup> EII Roadmap and Act 2020

The Project on exhibition lacks requisite description -sufficient enough for the Group to be able to draw appropriate assessment conclusions. The key infrastructure of the Project is still subject to ongoing engineering assessment;

1. The DA identifies '**indicative only**' **infrastructure deployment** - 225MW (AC) of ground mounted solar installation.
2. It **obviously unclear to OSFD** as to whether this will be 'ground mounted fixed tilt or single axis tracker deployment'.
3. Thirdly the DA doesn't specify the type and quality of the solar panel to be deployed
4. The DA is confused in its sizing and type communication as to the proposed **Battery Energy Storage System (herein 'BESS') to be deployed**

This lack of deployment clarity induces procedural unfairness for the Group – the actual engineering configuration is sensitive to the Group's assessment of key issues such as project set -back, visual amenity, hazard management, glare, potential vegetation screening and impact on biodiversity.

**How can robust assessment be undertaken against an indicative infrastructure outlook?** A possible conclusion to be drawn is that the Developer doesn't intend to develop the Project. Maybe the DA really masks a real intention to acquire Agricultural Land. The transparency recommendations above induces this possibility.

**A .2 Recommendations DPIE needs to ensure that DA as a matter of procedural fairness identifies basic engineering and deployment details. 'Indicative' engineering asks more questions than it answers.**

- I. **DPIE should conclude in favour of Key Recommendation A and/or in the alternative Key Recommendation B.**

**B. The DA and supporting EIS is 'inconsistent with the Objects - NSW Environmental Planning and Assessment Act 1979.**

<b>Objective</b>	<b>Groups Observation</b>
To promote the social and economic welfare of the community and a better environment by the proper management, development and conservation of the State's natural and other resources,	<b>As confirmed by these objections the Project promotes negative social and economic welfare for the community and an erosion of the conservation of the States natural resources.</b>
To facilitate ecologically sustainable development by integrating relevant economic, environmental and social considerations in decision-making about environmental planning and assessment,	<b>In context any net benefit to ESD is outweighed by negative impact – no real sustainable economic gain to the community and against the backdrop of considerable unfairness and lack of due process attached to decision making</b>
To protect the environment, including the conservation of threatened and other species of native animals and plants, ecological communities and their habitats,	<b>As demonstrated hereunder this Project harms rather than protects flora and fauna</b>
To promote the sustainable management of built and cultural heritage (including Aboriginal cultural heritage),	<b>The developer's approach to the requisite consultation shows nothing but disrespect to Aboriginal Cultural Heritage</b>
To provide increased opportunity for community participation in environmental planning and assessment.	<b>The low water mark of this project has been the paucity and tokenism of the Developers approach to community</b>

## **Conflicts with core 'Principles of ESD'**

**Precautionary Principle** – there many elements of this project which invite for the application of precautionary science to avoid serious or irreversible damage to the environment these non-exclusively might include ; metal leachate from soluble toxins within damaged solar panels, Heat Island effect from solar deployment, industrial fire from BESS deployment.

**Intergenerational Equity** – the proximity of the Project to World Heritage Listed Wild Rivers National Park confirms an obvious and negative imposition on the enjoyment of future generations

**Conservation of biological diversity and ecological integrity**- The project detracts from both aspects of this important principle.

### **C. DA inconsistent with the SEAR of July 2019 - NSW Large Scale Solar Guidelines and DPIE Large Scale Solar Presentation (Armidale 26 June 2019)**

- DPIE -David Kitto and Nicole Brewer -in presentation **NSW LS Workshop** attached at stressed the importance of Community Consultation and Community Participation – The Developer has offered no participation in the development process -pending the EIS. The stock standard response to questions and emails was wait until the EIS. Written communication was by way of only one Project Update April 2019. This issue is addressed in more detail hereunder.
- **The SEAR** issued on 2. August 2019 requested “...In particular you must undertake detailed consultation with affected landowners...” No detailed consultation took place. There was a token effort at Community information briefings.
- The Project offends the Objectives and Strategic Context of the **Large-Scale Solar Energy Guidelines** (Annexure E)

- 1) **Site Selection**; It is hard to envisage that OFSD followed the process pathway for site selection. Any constraints map would have confirm appalling and obvious fatal flaws to the proposed development. Immediate proximity to the Oxley Wild River National Park – immediate proximity to the Blue Holes Recreation Area- and its role as a biodiversity hub for many threatened species, fire prone area, potential damage to the Gara River and tributaries are fundamental and important perennials contributing to the Macleay River Catchment- reduced visual amenity to the close neighbours , conflict with agricultural pursuit and conflict with urban land use zoning.

As DPIE is aware the Group, in **relation to site selection** has sought through GIPA information, communications and documented feedback OFSD was provided at or arising from the Scoping Meeting

- 2) **Stakeholder Engagement** -as will be canvassed hereunder OFSD contrary to their Community Communication Plan attached (Annexure F) offered a paucity ‘tick box’ community engagement including the Indigenous Community.

### **D. Developer Conduct -In Consistent with the principles of Community Consultation**

#### **D1. Community Consultation**

As already well documented in this submission – the Developer has set a new ‘low bar ‘in Community Engagement. Annexure D; Community Consultation Plan is farcical in its referencing of Community Consultation Principles ‘openness and inclusiveness ‘and Best Practice “ ... involving the community in all decision-making stages of the project “ and respect for effective and meaningful engagement.

The actual delivery from the Developer was the exact opposite and certainly misrepresented in elaborate EIS narrative – yes, the activities were ‘tick box’ with activities evidenced. However, it was far from the ‘best practice’ robust platform as introduced.

**A.3 Recommendations – This development should have been subject to Community Consultation Framework which is offered by the Minister to Wind Projects and for unknown reasons not to Large Scale Solar projects ?**

## **D2. Aboriginal Community Consultation.**

As with the broader Community – it is apparent, on closely reviewing the EIS and talking with Indigenous Community leaders that the experience was far from the robust narrative offered by the Developer

The Developer is again high on explanation on the process but well short of a satisfactory of actual implementation. Like some much of the EIS there is a thin thread of truth surrounded by misrepresentation. For example, there was seven Aboriginal consultation groups identified with the Iwatta Aboriginal Corporation being the senior point of liaison. Assessment Methodology was sent to the groups and none of the registered parties raised any objections nor did they provide requested information. Iwatta AC advised that had participated in a field work which had to be aborted as grass was too high to allow inspection. It would appear that the Developer sent a draft version of the Aboriginal Cultural Heritage Assessment Report was sent to the Registered Groups inviting comment a 28-day time limit was set for response – no response was received. The Developer maintains that the time constraint for the EIS will mean that any comments or actual amendment will be considered in the test excavation report.

So, it’s not argued that consultation was not attempted, and that consultation is inconsistent Clause 60 of National Parks and Wildlife Regulation 2019 -however there is insufficient signoff and feedback to the Project Proposition. No one is arguing that the site is not culturally sensitive.

**A4. Recommendation – The Aboriginal Consultation approach needs to be reviewed and revised arrangements as to consultation and feedback needs to be set out within a more realistic time frame. The Aboriginal Groups need representation on the CCC recommended in A:3 above.**

## **E. Merit Assessment which does not support Development Consent.**

This project introduces **8 Fatal Flaws** -which all demerit the value of this site. Many of these **flaws** have obvious public interest considerations. The breadth and depth of these fatal floors confirm for the Group;

1. That the flaws identified are ‘fatal’ and therefore not capable of repair sufficient to induce consistency with the objectives of the Act.
2. That **Key Recommendation A** ,as tabled above should confirm that the DA is rejected by DPIE.



3. That should DPIE be in any doubt as to the Group's conclusion then further independent assessment should be recommended at the Developer's cost and that this Assessment be subject to the highest standards of transparency; and

4. That the DPIE's Assessment Team should conduct an immediate site inspection including where appropriate meetings with the Communities, Regional Agencies and the Armidale Regional Council.

### **E.1 Biodiversity**

The EIS is in error in downplaying the impact this development will have on the many threatened species in and around the development site. The site including the water systems of Gara River, The Commissioners Waters and the Blue Hole itself contain many threatened critically endangered fauna and flora species. The EIS takes the BDAR and BAM no further than the Scoping Report it is patently obvious that even on the key results on offer by the Field Work and Desk Studies that the development will have significant impact on fragile biodiversity. The proposed offsets pursuant to the NSW Offset Scheme will fall well short of the mitigation required to the obvious significant forecast impact.

**The Group strongly recommends that the Site be subject to a more professional independent and objective assessment of the many irreparable impacts this project will have on this important biodiversity habitat.**

### **E. 2 Proximity Wild Rivers National Park and Important Heritage Issues .**

Consistent with the issues highlighted above -the proximity to the UNESCO World heritage listed asset is totally unacceptable from a visual amenity, fire risk, biodiversity perspective and recreational enjoyment perspective. The Wild Rivers National Park boasts Gondwana rainforest -dramatic gorges and magnificent waterfalls. The development conflicts with the heritage value of the Gara river Hydro-Electric station which in its day became the world's most important DC generator schemes.

**The EIS is silent as to this obvious impact** – the suggestion as to screening as mitigation of loss of visual amenity from the Therelfall track is ludicrous as to its impact. The Development will be in full view from the recreational area at Blue Hole. **On this basis alone the DA should be subject to Key Recommendation A**

### **E 3. Erosion and Hydrology**

The EIS promotes what appears to be detailed soil analysis. Where the EIS takes this analysis as to potential impacts is subjective and in the absence of independent assessment misleading. The Community offer many years of experience in this country – observing it in flood, drought and more favourable climatic conditions. The topography of the site against any reasonable assessment of soil management would suggest -significant impact – through construction and operation and probable inability to adequately rehabilitate post decommissioning.

On professional advice the safeguard and mitigation measures proposed will not be able to be effectively managed through Soil and Water Management Plan.

**The Group strongly recommends that the Site be subject to a more professional independent and objective assessment as to many of the irreparable soil and erosion impacts this project will have on this site need more thorough and objective independent assessment.**

## E.4 Water and Catchment Management

There is consistency in the conclusion of the Group and the Developer that the project is exposed to the Gara River ,Commissioners Waters and their tributaries. There is even acknowledgement that this water courses contribute as perennial sources and tributaries of the Macleay River.

Where the Group parts company with the DA is the obvious and substantial impact the project – during construction and operation would have on these important water courses and most importantly what would or could be the potential impact pollution on the Macleay River community and their ecological and economic well-being. This may in the Group's view be substantial. The proposed Safeguards and mitigation measures present as 'cut and paste' and completely out of balance to the obvious risk proposed.

The Group maintains that any assessment by DPIE that concluded in favour of consent might well induce significant claims against the Developer and possibly DPIE as the representative of the Consent Authority. The potential risks need much more robust scientific assessment that offered within the DA .

**The Group is of the firm view that this issue raises serious alarm – and contributes substantially to the need for more robust scientific assessment of the impacts. An independent scientific assessment is mandatory. This is obviously an issue of heightened public interest.**

## E.5. Hazard Management

The Group has already highlighted the paucity of engineering conclusiveness and this is also reflected in the 'indicative' outlook on the BESS.

### E.5.1 Fire

The acknowledgement as to the potential fire risk proposed by Lithium Battery configuration is well acknowledged. The safeguards and risk mitigation proposed by the EIS presents as basic compliance – this is not acceptable to the Group. **What prudent assessment suggests is the need for a final EPC configuration to be tabled and for a fresh independent hazard management expert's opinion to be tabled . The Group will want input from first responders into this assessment. It will want a more robust HAZARDOPS plan to be tabled including requisite detail as to insurance arrangements and liability mapping. The group will expect full signoff as to liability.**

### E.5. 2 Toxicity

DPIE is fully conversant with the uncertainty of the science around the solubility of toxins including Cadmium from damaged panels. **The 'Precautionary Principle 'alone requisites a more robust scientific conclusion be established as to potential soil contamination and pollution to the nominated water systems . The Group requests that DPIE give urgent consideration to the application of this scientific evaluation.**

## E.6 Bush Fire Management

A major concern for the Group is that this project now sits not only in an area designated as Fire Prone but is also now in a Red Zone . The Developers underestimate the bush fire risk and secondly, they reference a compliance only to guidelines – that is not sufficient. This project given its proximity to the National Park requisites a beyond compliance strategy. The EIS relies on interpretation of existing frameworks -there is no evidence of third-party expertise referencing upgraded planning for fire protection embracing the Red Zone upgrade.

The Group and Community needs the comfort that the Safeguards and Mitigation Measures proposed are adequate and fit for purpose following the disaster of the 2019 Bush Fires. This can only be achieved by robust third-party evaluation and report. **This is the Group's strong Recommendation.**

## E.7 Visual Amenity

Any objective site assessment will confirm the development will induce significant de-valuation of the landscape characteristics not only from the neighbouring properties but also the broader community. The EIS in the absence of LVIA guidelines introduces their own subjective assessment of the impact including construction and operation . In support of the Developer's attempt to promote a subjective and favourable reflection they introduce through Appendix E a Moir Landscape Architecture Pty Ltd an interpretation of the LVIA

The bottom line is, as DPIE fully appreciate, that LVIA is probably the most malleable assessment in the EIS process. Developers can manipulate interpretations of landscape character assessment to suit development agenda. In this case the Developer has pursued viewpoint analysis which is dramatically different than the reality

- It has misrepresented through **subjective, facile and superficial interpretation** of community feedback the significant visual impact this Development will induce to the character of the landscape. A landscape appreciated by immediate Community and the broader Community.
- It has selected viewpoints convenient to its development interests – whereas there many others which paint a more realistic outlook.
- It has utilised photographic misrepresentation including zoom images and panoramic images which distort rather reveal the true landscape value and character.
- The suggestion that some residences will have fragmented views of the development is a poor attempt to disguise the reality of the outlook.

Accordingly, the Group welcomes the DPIE inspection of the true visual impact. **On this basis we believe that Key Recommendation A above is in the public interest and is the only fair and just conclusion DPIE can support.** The Group doesn't think that any amount of proposed vegetation will shield the project from the more prominent viewpoints exposed to loss of amenity.

## Conclusion and Recommendations

DPIE will appreciate that this response is a clear unequivocal rejection of the Development Application – the reasons are many and are summarised clearly in the analysis and recommendations set out above . We therefore see no need to repeat these in this conclusion. There are clear breaches of procedural fairness that have not been afforded the Community . These will continually be raised with the Minister Rob Stokes and the local member Adam Marshall. This DA presents an appalling and

irresponsible grab for a project and for potentially agriculture land. It is very difficult to appreciate how it would pass muster pursuant to eligibility let alone merit pursuant to the Electricity Infrastructure Investment Act .

Thankyou we look forward to the suggested DPIE Site inspection .



On behalf of the Castle Doyle Road Action Group  
14 April 2021