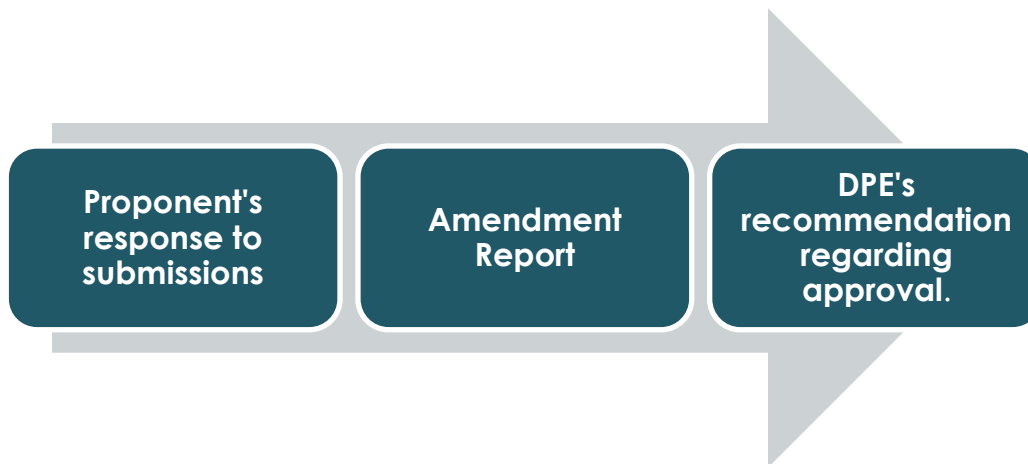


GLANMIRE SOLAR FARM PROJECT UPDATE

MAY 2023

The Glanmire Solar Farm project's environmental assessment team is finalising their analysis and responses to the submissions received throughout the exhibition of the Environmental Impact Statement (EIS). Key amendments to the project as exhibited have also been determined.

Elgin Energy would like to thank the community for all submissions received and expect to submit the completed Submissions Report and Amendment Report to the Department of Planning and Environment (DPE) this month.



IN THIS PROJECT UPDATE:

1. Key issues raised in submissions
2. Amendments to the project
3. Insurance impacts
4. Land soil capability (LSC) impacts
5. Visual impacts
6. Independent Planning Commission process.

KEY ISSUES RAISED IN SUBMISSIONS

There were 137 public submissions received during the exhibition period. Please refer to the table below with a detailed breakdown of letters of support and objections.

Six organisations provided separate submissions which included one in support, four objections, and one providing comment. Seven government agencies provided detailed submissions and five additional agencies cited no comments. In addition, the Bathurst Regional Council provided a detailed submission and no agencies objected to the project.

The majority of submissions were submitted by residents in the suburbs of Glanmire, Bathurst, and Brewongle. This was followed by Castlereagh, Eglinton, Robyn Hill, and Kelso. Together, they account for almost 59% of public submissions. Altogether, 110 submissions came from within 45km of the proposed site. This accounts for approximately 80% of submissions. Twenty-seven submissions were submitted further than 20km away.

It is not unusual to receive more objections than letters of support for a State Significant Development (SSD). The key role of an applicant at this stage in the Planning process is to respond clearly to each issue raised in the submissions. The applicant's response will also be available on the DPE Major project portal once published.

The table below summarises the issues raised in the public submissions, ranking those most prevalent and noting letters of support versus letters of objection.

Issue	Total submissions	Support	Object	Ranking (by prevalence)
Location chosen	123	2	121	1
Prime Agricultural Land impacts	90	7	83	2
Visual impacts	84	1	83	3
Insurance Issues	47		47	4
Impact on neighbouring agricultural operations	38		38	5
Conflicts with planning instruments	37		37	6
Socio-economic impacts	34	1	33	7
Near neighbours impacts generally	33		33	8
Fire risk	30		30	9
Land capability	26	2	24	10
EIS Assessment Methodologies	25	2	23	11

Issue	Total submissions	Support	Object	Ranking (by prevalence)
Proponent	22		22	12
Consultation with community	19		19	13
Tourism	18		18	14
Erosion and stormwater	12		12	15
Procedural matters	11		11	16
Climate	14	4	10	17
Waste and resource recovery	11	1	10	18
Dissatisfaction with agencies	10		10	19
Contribution to grid	8	2	6	20
Traffic and transport	5		5	21
Cost/benefits	5		5	22
Addressing regulations	4		4	23
Procedural matters	3		3	24
Aboriginal heritage values	3		3	25
Biodiversity values	3		3	26
Ethical matters	3		3	27
Co2 Calculations	3		3	28
Noise	2		2	29
Industry terminology	2		2	30
Water supply	2		2	31
Subsidies	1		1	32
Water Use	1		1	33
Total	729	22	707	34

Table 1-1 Issues raised in public submissions

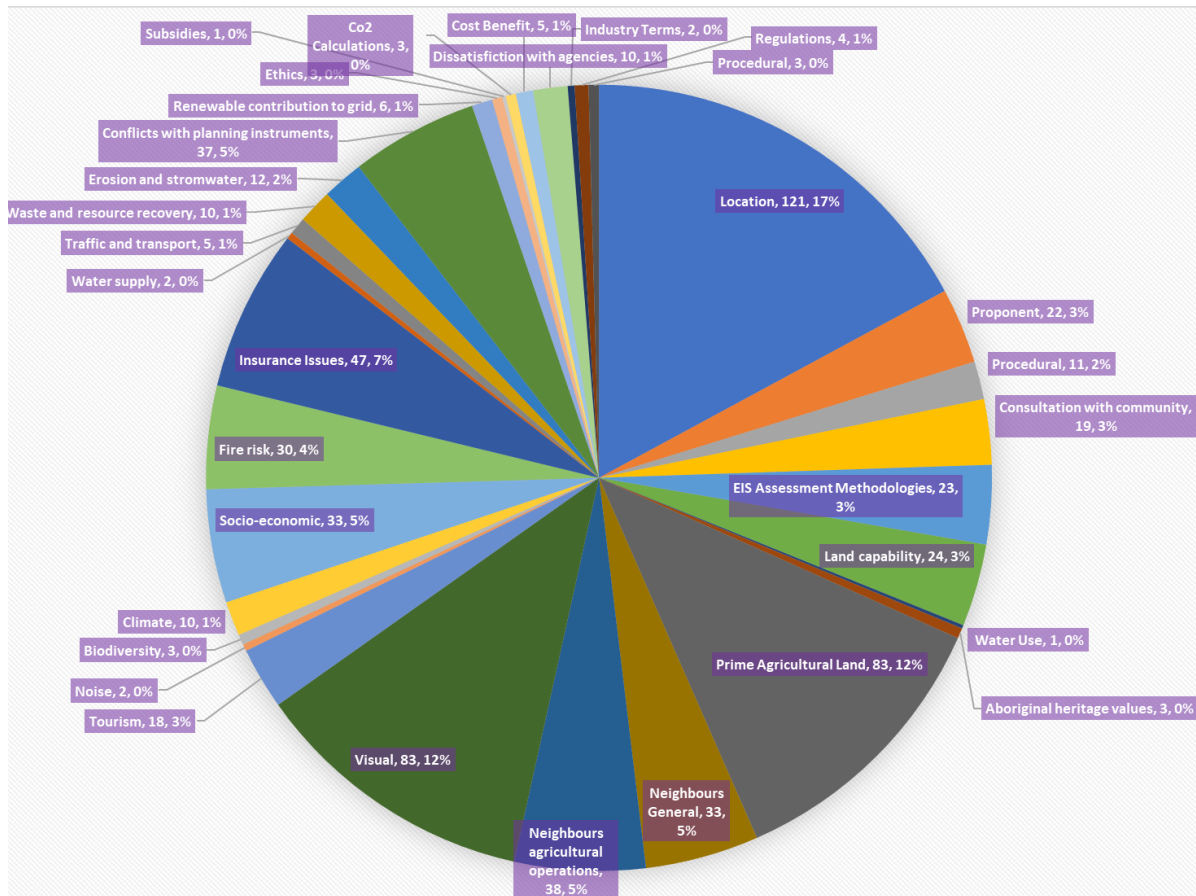


Figure 0-1 Issues raised most often in public submission objections.

CHANGES TO PROJECT

To address agency comments received during the exhibition of the EIS, the following reports were updated and will be appended to the Submissions Report:

- Traffic impact assessment, Amber Organisation 2023
- Biodiversity Development Assessment Report, AREA 2023

In response to the submissions, several mitigation strategies have been strengthened to provide greater certainty. These primarily include:

- Aboriginal cultural heritage management during construction
- Traffic management during construction
- Fire and emergency planning provisions during operation
- Rehabilitation commitments during decommissioning.

The only change to the project description is in relation to onsite battery storage. Elgin Energy has further investigated battery technology over the last four months and notes their preferred Original Equipment Manufacturer (OEM) no longer produces a one-hour storage solution, which was the option proposed in the EIS. Elgin has identified a preferred solution altering the onsite battery from one-hour to two-hour storage duration.

The new technology is more efficient and able to physically fit into smaller spaces. Therefore, this does not affect the development footprint or location of key infrastructure proposed in the EIS. It also does not affect traffic or noise impact assessment assumptions.

The increased storage duration will provide amplified system strength and voltage control to the grid as well as increased energy arbitrage capacity.

Specialist advice will accompany a detailed explanation of this change in the Amendment Report. The following supporting material will be included in the Amendment Report:

- Bushfire assessment advice, NGH 2023
- Preliminary hazard assessment advice, NGH 2023
- Noise impact assessment advice, Renzo Tonin 2023.

INSURANCE UPDATE

Throughout the EIS and Submissions Report phases of the project, there were concerns raised by the community about the potential of neighbouring property insurance premiums increasing due to the capital cost of the project's assets and their potential to be affected by a local grass fire, for example.

While we have previously communicated advice received from insurance bodies, Elgin Energy sought further advice to address the submissions:

- The Australian Insurance Council was consulted prior to EIS exhibition and again after. They confirmed there is no further change to their initial statement, which was, they are not aware of any position of escalated risk focus being placed on neighbouring properties solely as a result of solar facilities being established.
- Communication with the National Insurance Brokers Association (NIBA) resulted in a similar comment. They advised there is no evidence of increasing insurance premiums.
- Elgin Energy has also been in talks with one of the largest insurance brokers in Australia (which cannot be named). They noted that as the solar farm will be managed and operated with strict protocols, which includes vegetation and bushfire management, the activities of the neighbouring farms will not have a bearing of the insurance of the solar farm based on the distance between the solar farm structure and the neighbouring properties.
- Clean Energy Council (CEC), an industry representative body for Clean Energy in Australia, stated they are not aware of any instances where a landholder's insurance premium was increased due to the presence of a neighbouring solar farm or BESS project.

In regard to the neighbouring properties, Elgin Energy have formed the view that the construction of a solar farm and BESS on adjoining neighbouring property should not significantly impact the cost of public liability policy of a neighbouring landowners. When compared to the existing onsite agricultural site operations, the project may reduce risks of fire, soil, water, and biosecurity impacts, specifically. That is, in combination with the improved site access and onsite network of access tracks that accompany the project, the project's mitigation commitments will ensure the site is well managed and monitored.

At this time, no effect has been demonstrated but Elgin Energy recognises the level of concern and is working with the DPE to ensure this issue can be addressed appropriately for the broader

renewable industry as well as the Glanmire Solar Farm. In the future, if there is credible evidence that is proven to suggest there are uplifts in insurance premiums of landowners neighbouring solar projects, that is specifically caused by the operation of these projects, then Elgin Energy are happy to work with government agencies and DPE and industry bodies to look to address this issue.

LAND SOIL CAPABILITY (LSC) UPDATE

Many submissions opposed the development of a solar farm on prime agricultural land.

We can confirm that no land classified as Bio strategic Agricultural Land (Capability classes 1-3) would be affected by the construction of the Glanmire Solar Farm.

The classification of land capability included a detailed assessment of site and soil characteristics carried out by SLR as per the requirements of The Land and Soil Capability Assessment Scheme Second Approximation (NSW Office of Environment and Heritage, 2012). The assessment demonstrates that all sites within the subject land were classified as LSC Class 4 (172 ha), except for areas with 10% or greater slope, which were classified as LSC Class 5 (14 ha). The assessment includes an Agricultural Impact Statement which concludes a low impact on agricultural capability, infrastructure, and the agricultural local economy would result from the project.

The completion of soil surveys is to ground truth the model mapping. A peer review of the detailed assessment was also included in the report for transparency and highlighted that: *'the conservative approach taken by SLR is likely based on a more practical understanding of the site and its present and historical land uses'*.

This approach is considered best practice and exceeds existing assessment requirements in that an Agricultural Impact Statement has been prepared.

The project is considered highly reversible, as the solar arrays will be mounted on pile-driven posts with the ground cover managed beneath them to manage fire risks, as well as address the potential for erosion. More than 90% of the Development footprint will remain as pasture for the life of the project, once post-construction remediation is complete.

The project commits to best practice rehabilitation measures including:

- Removal of most below-ground infrastructure to a depth of 1000mm, to assist the reintroduction of agricultural land uses
- A Decommissioning Environmental Management Plan to rehabilitate the site to a safe, stable, and non-polluting state, equal to or better than its current land capability class and consistent with future land use requirements.

VISUAL IMPACT UPDATE

As a result of consultation activities undertaken during the EIS phase, visual impacts were also one of the most raised issues in the Submissions Report phase. This included submissions about local character views and views from specific residences. Further comments have been provided in the Submissions Report in relation to this.

The project outcomes however remain as stated in the EIS:

- Very low visual impacts on six surrounding dwellings on day one, reducing to nil with mitigation. Low visual impacts on three additional dwellings on day one, reducing to very low visual impact with mitigation.
- Low landscape character impact – no mitigation is technically required but it is noted the mitigation that is proposed may enhance landscape character due to the revegetation of two streams within the site with riparian vegetation, and the planting of hundreds of trees around the perimeter of the site
- A moderate visual impact on views from Brewongle Lane, reducing to low visual impact with the implementation of the landscape plan.

INDEPENDENT PLANNING COMMISSION INVOLVEMENT

As more than 50 unique objections were received, it is anticipated that DPE will shortly confirm that after their assessment is completed, the project approval decision will be delegated to the Independent Planning Commission (IPC). This provides an additional opportunity for the community to be heard before a decision is made by this independent planning body.

Further information on the IPC can be found at <https://www.ipcn.nsw.gov.au/>

NEXT STEPS

We would like to thank you for your involvement throughout the EIS phase and your ongoing input into the Glanmire Solar Farm project.

We are committed to keeping the community informed and will endeavour to answer any questions or concerns you may have throughout the current and future phases of the project.

Once DPE has formally confirmed the IPC is the next step in the approval determination, we will be in touch with further correspondence to inform you regarding the next steps.

Should you require further information in the meantime, please contact us via email at engage@nghengage.com.au.