23 August 2022

Wagga Wagga City Council
PO BOX 20
WAGGA WAGGA NSW 2640

Attention: Sam Robins, Senior Town Planner

Via Email

Dear Sam,

Re: DA22/0122 – Electricity Generating Works – Solar Farm
1268 Oxley Bridge Road, Uranquinty

Habitat continue to act on behalf of Bison Energy and provide this response to the following correspondence received in relation to Development Application 22/0122:

- Council's letter dated 9 May 2022,
- Southern Regional Planning Panel's Record of Briefing dated 8 June 2022 and as reiterated by Council's letter of 18 July 2022.

These letters requested additional information in relation to subject application and this letter responds to the outstanding matters contained within these requests.

1. Amended Documentation

In response to the matters raised in the further information request, the following amended documents have been provided for consideration:

- Statement of Environmental Effects, prepared by Habitat Planning
- Glint and Glare Report

2. Additional Documentation

In response to the matters raised in the further information request, the following additional documentation has been provided for consideration:

- Operational Noise Emission Assessment, prepared by Acoustic Dynamics dated 26 July 2022
- Construction Noise & Vibration Management Plan, prepared by Acoustic Dynamics dated 26 July 2022.
- Formal Response from NGH Consulting with regard to Aboriginal Cultural Heritage matters.

3. Response to Additional Information

The following matters are discussed in response to both Council's letter dated 9 May 2022 and Council's letter dated 18 July 2022.

3.1. Statement of Environmental Effects

Council's letter mentioned inconsistencies between the written documents and the plans. These inconsistencies have been updated in a revised Statement of Environmental Effects and is **attached**.

3.2. Acoustic Impact

Council advised that there was limited assessment on potential noise impacts. The proponent has commissioned a 'Operational Noise Emission Assessment' and a 'Construction Noise & Vibration Management Plan' both of these reports were prepared by Acoustic Dynamics and are **attached.**

3.3. Glint and Glare

Council requested that an independent peer review of the Glint and Glare Assessment Report be undertaken. Further to our correspondence on 26 May 2022, Environmental Ethos was engaged on Council's direction to undertake a peer review. Environmental Ethos has requested additional information which is discussed below.

The peer review of the glint and glare assessment requested the following information be clarified:

> *The following additional information is requested from the Applicant in relation to the peer review of the proposed Uranquinty Solar Farm Glint and Glare assessment prepared by Bison Energy Company dated December 2021:*
>
> 1. *PV Array Layout: The PV array layout as shown in the Overall Site Layout Plan (revision S4/DA1 date April 2021) is different to that shown in the glare modelling PV footprint (Appendix A: Forge Solar Assessment Summary). Provide a revised glare model consistent with the Site Layout Plan.*
>
> 2. *PV Array Height Above Ground: The height above ground of the PV Array used in the glare model is set at 1.2m. The height of the PV Array at full rotation is 2.6m with a panel width of 2.4m, as shown on S10/DA1. Confirm if the height used in the glare model is the maximum height anticipated for the Project, and if required adjust the glare model based on the maximum height.*
>
> 3. *Eye height of sensitive receptors: The eye height of drivers in 'typical' vehicles (as noted on page 10 of the report) has been set at 1.5m above ground. This eye height does not take into consideration the higher viewing range of drivers in commercial vehicles including trucks. Provide evidence, including a revised glare model if required, that the increased view height of drivers of commercial vehicles will not be impacted by glare. For information on eye height of truck drivers refer to Austroads, Guide to Road Design Part 3: Geometric Design.*
>
> 4. *Backtracking Operation: The assessment results note 'that the facility will not result in any significant glare on the receptor points provided that backtracking is disabled'. Typically, tracking systems are not generally disabled in this process. It is preferable to avoid planning conditions that limit normal operational parameters and thereby increase the burden of compliance monitoring. The Solar Glare Hazard Analysis Tool (Glare Gauge) has been updated with a backtracking feature that provides a more realistic model than the previous resting angle option. A revised glare model should be considered that includes normal backtracking for a flat site, including a stowing/resting angle that is typical of the generally available tracking systems. The revised glare model should consider potential impacts on observation points and routes, and note any increase in glare potential as a consequence of a typical backtracking operation.*

Response: An amended Glint and Glare Assessment has been provided as attached to this letter that addresses these matters as follows:

- A revised glare model is provided that is consistent with the site layout plan. The revised model confirmed no further impacts were identified as a result of this analysis.

- The height of the PV Array has been amended to include the full rotation and panel height of 2.6m. The revised model confirmed no further impacts were identified as a result of this analysis.

- An updated report has included an amended eye height of sensitive receptors for commercial vehicles consistent with the classifications provided by the Austroads, Guide to Road Design Part 3: Geometric Design. No further impacts were identified as a result of this analysis.

- Further discussion regarding backtracking has been undertaken in the amended Glint and Glare Report. A revised ForgeSolar Report is also enclosed the provides updated results as a result of the recent updates to the Solar Glare Hazard Analysis tool. No further impacts were identified as a result of this analysis.

3.4. Submissions

A response to relevant planning matters raised by the submissions have been addressed in the **Section 4**

3.5. Analysis of Class 3 Agricultural Land

Further discussion was requested in relation to any impact associated with class 3 agricultural land. The following information was requested:

> *"Further discussion will be required on the impact on class 3 agricultural land. This discussion should include figures around the number of solar farms within the LGA, their areas and the percentage of class 3 land that equates too."*

Response:

A review of Wagga City Council's development application tracker confirms a number of development applications for 'electricity generating works' the detail of which is provided in the table below. Properties not zoned for rural purposes have been 'greyed out' as they are not relevant to the discussion regarding agricultural land, however provide context for approved solar farms that exist within the Wagga LGA.

Table 1 – Electricity Generating Works Development Applications

DA Number	Address	Status	Zoning	Completion	Size	Comment
DA16/0135	299 Trahairs Road, Bomen	Approved	IN1	Operational	26MW (30ha)	Bomen Solar Farm
DA17/0679	157 Windmill Rd, Bomen	Approved (Court)	RU1	Operational	30MW (70ha)	Wagga Wagga Solar Farm North (WWSFN).
DA17/0434	16 Jersey Street, Bomen	Approved	IN1	Not commenced	2.5MW	-

DA Number	Address	Status	Zoning	Completion	Size	Comment
DA20/0016	157 Windmill Rd, Bomen	Approved	RU1	Under construction	18.7MW (55ha)	Wagga Wagga Solar Farm South (WWSFS).
DA20/0558	Fruitdale, 190 Rodhams Road, Uranquinty	Approved	RU1	Not commenced	12MW (42ha)	
DA21/0151	225 Trahairs Road, Bomen	Approved	IN1	Under construction	2.2MW (6.5ha)	
DA21/0390	59 Hillary St, North Wagga	Under Assessment	RU1	-	5MW (20ha)	
DA22/0122	Boorool 1268 Oxley Bridge Road, Uranquinty	Under Assessment	RU1	-	5MW (22.98ha)	Subject DA.

With reference to **Table 1** above **Table 2** (below) provides total area covered by solar farms in the Wagga LGA that are rural zoned.

Table 2 – Area of Solar Farms in Rural Zones

Status	Area (ha)
Operational	70
Under construction	55
Not commenced	42
Under Assessment	42.98
Total	**209.98ha**

A review and analysis of the Wagga LGA and the potential land requirements for solar farms on class 3 agricultural land. The following tables provide data relating to rural zoned and their identified land soil capability class.

Table 3 – Rural Land Figures in Wagga LGA

	Area (ha)	Percentage (%)
Total Land in Wagga LGA	482,160ha	100
Total Rural Zoned Land	455,227ha	94.4%
Total State Strategic Agricultural Land (ha)	111,844ha	23.2%
Total Class 3 land (ha)	153,170ha	31.76%

Table 4 - Rural Land in Wagga by zone

Rural Zone	Area (ha)	Percentage (%)
RU1	435,385	95.6%
RU2	9,179	2%
RU3	9,008	1.97%
RU4	907	0.2%
RU5	493	0.1%
RU6	255	0.05%
Total	**455,227**	

Table 5 – Total Land in Wagga LGA containing Land Soil Capability (LSC) Classes 1-3

Classification	In Wagga (ha)
1	0
2	0
3	153,170

From the information provided in **Tables 1-5** above the following information can be gleaned:

- 167 hectares of rural zoned land has historically been approved for solar farms in the Wagga LGA. Which represents 0.036% of all rural zoned land in the Wagga LGA. Of the 167 hectares, the approved solar farms only have a 0.1% impact on Class 3 LSC land.

- The subject development represents 22.98ha which has a 0.01% impact on Class 3 LSC land and a 0.005% impact on rural zoned land within the Wagga Wagga LGA.

Therefore, to confirm the Panel's enquires the figures above confirm that the proposed development (and indeed the existing approved solar farms in Wagga), currently have a very limited impact on Class 3 agricultural land, and even less impact across the rural zones that exist across the LGA.

3.6. Aboriginal Due Diligence Assessment

Further clarification was sought regarding the consultation undertaken with the Aboriginal Due Diligence Assessment Report submitted as part of the application. The following information was requested:

> *"The Aboriginal Due Diligence Assessment must include a detailed cultural assessment in accordance with the relevant consultation requirements."*

Response: Clarification was sought from NGH Consulting who completed the Aboriginal Due Diligence Assessment that confirmed the following:

> *"Consultation with the Aboriginal community in accordance with the NSW Aboriginal Cultural heritage Consultation Requirements for Proponents (DECCW, 2010), was not undertaken <u>as it is not required under the Due Diligence Code of Practice</u> and was not recommended as the NGH 2021 assessment concluded that the proposed works are unlikely to impact Aboriginal objects."*

A fully copy of the correspondence received from NGH Consulting is **attached.**

3.7. Traffic Report

Further clarification was sought regarding the traffic report that demonstrated suitability of Oxley Bridge Road for the use of b-double trucks. The following information was requested:

> *"The traffic report must demonstrate that Oxley Bridge Road is suitable for B-Doubles with particular attention to the bend in the road at the junction with Harveys Road."*

Response: The subject development does not propose the use of b-double during the construction or operation of the solar farm development. The submitted Traffic Impact Assessment and Statement of Environmental Effects make no reference to the use of b-doubles therefore it is unclear why the Panel have requested to understand and clarify the suitability of a vehicle that is not proposed to be utilised as part of the development.

It is considered no further response is warranted.

3.8. Landscaping

The Panel sought clarification of the following:

> *"Confirm the location of the landscaping and two fence types either side of the landscaping. Is it within the leased area?"*

Response: It is confirmed that all works are within the leased area.

3.9. Internal Access

The Panel sought clarification of the following:

> *"Are there more internal access tracks that should be shown on the proposed plan?"*

Response: No. The access tracks required are shown as demonstrated on the submitted plans.

3.10. Plans

The Panel requested that the plans be amended as follows:

> *"The plans need to clearly show the landscaping area separate from the 10m APZ requirement for bushfire."*

Response: Due to the large scale of the site (and by inference the plans) it is recommended that the plans are viewed digitally. When viewed digitally the plans clearly demonstrate that the landscaping and APZ's are separated when zoomed in. When physically printed, typical detail can be seen on Sheet 6, which provides and delineates that the APZ is separate to the landscaped area. Amended plan are not considered to be required as the submitted plans already demonstrate this separation.

3.11. Water Supply

The Panel requested clarification that the property contained adequate water supply.

Response:

The site can access water supply from the Riverina Water network. An 80mm WUPVC water main runs adjacent to the property along Oxley Bridge Road. If required, the onsite water tank could be connected to the mains water supply. The tank to be provided on site will be a total capacity of 20,000L exceeding the requirement under *Planning for Bushfire Protection 2019.*

3.12. Suitability of Site

The panel requested further discussion regarding the suitability of the site with regard to the capacity of the overhead powerlines. The request reads as follows:

> *"Please discuss the location in terms of its suitability with specific regard to the type of powerlines located on site"*

Response:

The purpose of a solar farm is to support provision and feed the grid with capacity, therefore capability and capacity of overhead powerlines is not an important determining factor.

Whilst proximity to the electricity network, available connection capacity or distance to towns, cities or other major energy users is important in site selection, environmental factors also play an important role. The site has also been selected as it is relatively unconstrained and is not impacted by matters such as natural hazards, agriculture, biodiversity, visibility, topography, waterways or other significant environmental constraints.

Following approval of a development application, the proponent must undertake a range of technical studies that then inform their approvals and commissioning to then begin construction of the solar farm. These studies do not occur prior to approval of a development application.

It is also noted that suitability of the site has been addressed as part of the assessment of impacts found in Section 5 of the submitted Statement of Environmental Effects.

4. Submissions

The purpose of this section is to provide comments and response to the submissions received during the public notification period. Council provided a copy of redacted submissions, which included 10 unique written submissions and 1 agency submission. Across these submissions a total of 9 thematic issues have been identified. A response to the submissions is provided in the following sections. The responses have been provided regarding the thematic issues raised.

4.1. Impact on agricultural land

Eight of the submissions raised matters relating to the potential impact of the development on agricultural lands.

The site has been partially identified on the draft State Strategic Agricultural Land map. Whilst it is acknowledged that competing land uses and their impacts on agricultural land are an important consideration at present, there is no NSW Government policy on the priority and preferred use of agricultural land. The mapping is also currently in draft form, and it has been acknowledged to contain erroneous mapping outcomes, therefore the accuracy of this mapping could be reasonably questioned until such time that this mapping is finalised and there is policy[1] requirements provided around its intent and application.

Since the mid-2010s, the development of solar farms in regional areas within Australia has increased dramatically, reflecting the sharp fall in the cost of solar photovoltaic (PV) technology, which now makes solar the lowest-cost form of electricity. As the solar sector grows, there is an increasing interest in exploring and promoting new models for complementary solar energy and agricultural production. This coupling is known by a range of interchangeable terms including ‘agrisolar’, ‘agrivoltaics’, ‘agrophotovoltaics (APV)’ and ‘solar sharing’. In a livestock grazing context, solar panels and solar farm fences improve the sheep’s welfare by providing protection from the elements and predators[2]. Many companies working within the solar sector have committed to providing impact minimisation on agricultural land which is highly productive and have sought to explore opportunities where the integration between solar and agricultural production is mutually beneficial.

Further discussion regarding the suitability of, and impact on agricultural land has been provided in Section 3.5 of our response above.

4.2. Contamination

Two of the submissions raised matters relating to the potential impact of contamination resultant from the proposed development.

An extensive search of scholarly and academic research databases along with other reputable information sources could not locate any information regarding the potential for contamination to result from the use of solar panels. The only information that could be found related to contamination that occurred as a result of solar panels being disposed of in landfill once their useable life was completed and the panels were decommissioned. The proposed solar farm will be supported by a decommissioning plan to be developed post consent. This plan will include provision to ensure that all solar panels are recycled.

4.3. Traffic impacts

Four submissions raised impacts associated with traffic movements and management. The majority of issues raised are not relevant to the subject development and are matters that would better be addressed through Council’s traffic team as general enquiries and feedback.

A Traffic Impact Assessment has been prepared to support the development and demonstrated that the proposed development would not have an adverse impact on the existing road network. The Traffic Impact Assessment provides two recommendations which will be implemented by the proponent. This includes a minor upgrade to the primary access into the site from Oxley Bridge Road and the development of a Construction Traffic Management Plan (CTMP) which is to be developed in accordance with applicable Australian Standards and relevant TfNSW Technical Manuals and Guidelines.

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[1] *State Environmental Planning Policy (Primary Production) 2021,* which provides a policy framework for state significant agricultural land and does not provide any consideration relevant to the subject application.
[2] *https://assets.cleanenergycouncil.org.au/documents/resources/reports/agrisolar-guide/Australian-guide-to-agrisolar-for-large-scale-solar.pdf*

4.4. Fire Risk

Two submissions raised fire risk as an issue relating to the development.

The development is not identified as being bushfire prone land, however this does not eliminate the risk of fire entirely. It is contended that the development will exhibit low fire risk during construction and decommissioning from the use of materials. The buildings on site will be constructed of low combustibility or non-combustible materials in accordance with the NCC. All electrical components will be designed and managed to minimise potential for ignition. The solar array, which will occupy most of the site, will be largely constructed of glass, silicon, steel and aluminium and will have very low flammability.

The site will be managed during construction through basic vegetation management to lower the risk of grass fire and appropriate fire suppression devices will be used during any required 'hot works' (i.e. welding).

During operation the site will contain all relevant fire suppression devices including fire extinguishers for buildings and an onsite water tank with a total capacity of 20,000L. The development will maintain 10m APZ's in accordance with the Planning for Bushfire Protection 2019. The development will have appropriate emergency management procedures in place to ensure the safety of all persons on site, and the protection of the subject and surrounding properties.

It is therefore considered that any relevant planning matters relating to fire risk have been appropriately managed or can be managed as part of the development.

4.5. Environmental impacts

Five submissions raised a number of environmental impacts and issues including the following:

- Tree removal
- Erosion
- Habitat removal and degradation (swift parrot and squirrel glider)
- Native habitat impacts
- Salinity
- Waterway impacts

A Biodiversity Report was prepared and submitted with the subject application. The Biodiversity Report confirmed that a range of the matters raised above from the submissions are not relevant to the development application or will have minimal if not any impact.

The development does not propose the removal of any trees, the vegetation to be removed is also classified as 'category 1 – exempt land' therefore its removal is exempt under the Local Land Services Act 2016.

The development will employ relevant soil and water management techniques in accordance with the relevant conditions of consent as imposed. Generally, no erosion impacts have been identified as the development does not require significant earthworks to establish the solar farm.

Clause 7.3 'Biodiversity' of the Wagga LEP has been considered in the Biodiversity report which confirms that a significant threat on threatened species, threatened ecological communities is considered unlikely on the following conditions:

- The amount of habitat to be removed or disturbed by the proposal is relatively small in an already fragmented area.

- No further fragmentation of the habitat would occur.
- No substantial contribution to any key threatening process would be expected.

Much of the development footprint is comprised of exotic dominated grassland. The development footprint has been subject to previous disturbance because of cropping land use. A complete absence of overstorey or shrubs was observed in this area. The most abundant groundcover species in these areas included Ryegrass (**Lolium sp.*), Clover (**Trifolium sp.*), Oats (*Avena sp.*), Canola (**Brassica napus*), Capeweed (**Arctotheca calendula*), and Patterson's Curse *(*Echium plantagineum*).

Based on the habitat assessment carried out by NGH one (1) EPBC listed species - the Superb Parrot *(Polytelis swainsonii)* was determined as having potential to occur within the development footprint. An Assessment of Significance (AoS) has been completed in Appendix B.3. of the NGH Report. An assessment of Significant Impact was undertaken for the Superb Parrot and determined the proposal would not have a significant impact on this species as;

- The amount of habitat to be removed or disturbed by the proposal is relatively small in the context of the greater area of habitat that would remain.
- No further fragmentation of habitat would occur.
- No substantial contribution to any key threatening process would be expected.
- Mitigation measures would be implemented to prevent significant impact to these species.

Direct impacts to native vegetation have been avoided by the proposal where possible. Given the local context and small area of native vegetation to be impacted, the works are considered unlikely to have a significant environmental impact.

Mitigation and management measures have been recommended in order to minimise impacts to threatened entities, prevent disruptions to the life cycle or harm to individual animals of these species and minimise the contribution of the proposal to key threatening processes.'

Finally, the development is not mapped as containing saline land, or being within close proximity to any significant waterways that require additional consideration or assessment.

It is therefore considered that the development will not have any adverse environmental impacts.

4.6. Visual Impact & Landscaping

Two submissions raised visual impact and inadequate landscaping as a result of the proposed development. A visual impact assessment has been undertaken for the subject development and was submitted with the development application. The visual impact assessment confirmed that there would generally be low impact across the viewshed. Associated landscaping has been proposed where visual impact is considered to be 'high', the landscape buffer varies between 3-5m where required to ensure appropriate mitigation. With the implementation of the proposed landscaping, the generally flat topography associated with the existing vegetation, the ability for visual impact to exist is low if not negligible. The siting of the proposed solar farm has sought to avoid areas with topographical constraints that would increase the visibility of any solar development or require significant changes to the natural landscape. The site was selected (amongst other reasons) for the exiting vegetation, structures and flat landform that would provide natural screening of the subject development without the need for substantial works that would need to aid visual impact.

4.7. Property value

One submission raised concern that their properties would be devalued because of the development.

The *Environmental Planning and Assessment Act 1979* requires consent authorities to take into consideration, when relevant, the 'likely impacts' including the 'social and economic impacts in the locality' of a proposed development, when making their determinations. In this context 'likely impacts' means "a real chance or possibility".[3] However, the additional proviso of 'in the locality' requires a unique, and possibly expanded, consideration of loss as authorities consider local economic consequences. The nature of the development and its likely impacts will influence the scope of *locality* to be considered. In this instance, the development of the solar farm is considered to have an overall positive economic impact on the 'locality', due to its appropriate location, siting, and compliance with the objectives of the relevant zoning. Whilst this could increase or decrease property values, it is considered that the impact of this development will have little negative implications and overall impact across the locality of Uranquinty and the Wagga Wagga Local Government Area.

It is further outlined in Alphatex Australia v The Hills Shire Council (No 2) [2009] where the commissioner presiding over the case simply saying *"I pay no regard to the fears about loss of property values as, consistent with the position long taken in the Court, this is not a relevant planning consideration"*

As such matters regarding economic impact have been considered, however individual property value impacts are not a relevant matter for the consent authority to consider under s4.15 of the Act.

4.8. Glint and glare

One submission raised concern regarding the accuracy and impact associated with glint and glare produced by the subject development.

A Glint and Glare Assessment has been undertaken for the proposed development. This assessment has also been peer reviewed by a suitably qualified person to confirm that the assessment undertaken is valid. An amended glint and glare assessment has been prepared as a result of further information being requested from the third party undertaking the peer review and this information is provided as part of this response to the Southern Regional Planning Panel.

The glint and glare assessment confirms that the development will have no glint or glare impact.

4.9. Impacts on residential areas & growth

Submissions raised concern that the proposed solar farm would limit residential growth of Uranquinty and would have 'impacts' on the established urban residential areas. The solar farm is located approximately 1km from the nearest vacant urban zoned land and approximately 1.6km from the nearest populated urban areas. At this distance and perceived impact would be considered low. The solar farm proposes significant landscaping and is also supported by a visual impact assessment and glint and glare assessment that demonstrates that impacts on the village of Uranquinty are negligible.

Furthermore, the proposed solar farm is not considered to have any potential impact on the growth of the urban area of Uranquinty. A review of the *Wagga Wagga Local Strategic Planning Statement* and *Wagga Wagga Spatial Plan 2013-2043* notes that the only identified urban growth for Uranquinty is to the north of the established township. A review of the current land zoning map also clearly demonstrates that there is a considerable level of vacant zoned land around the township already. Therefore, any further growth of Uranquinty is unlikely during the life of the proposed solar farm.

It is further contended that the subject land is not located within the 'Regional Cities Map' for which Section 2.42 of *State Environmental Planning Policy (Transport & Infrastructure) 2021* applies. Therefore, relevant consideration on the impact of the development on residential and commercial uses of land along with a cities capacity for growth or scenic quality and landscape character is limited to what is considered relevant for assessment under section 4.15(1)(b) of the EP&A Act.

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[3] Hoxton Park Residents Action Group Inc v Liverpool City Council (2011) 184 LGERA 104 at [46].

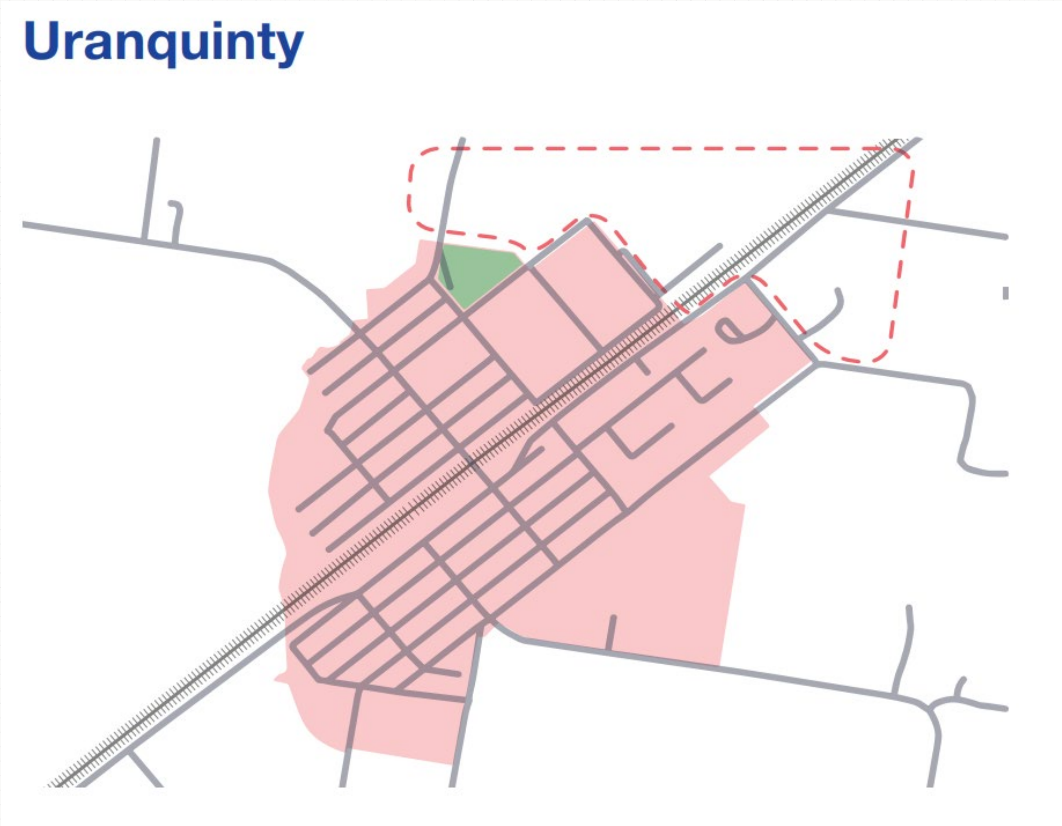

Figure 1 – Extract Wagga Wagga LSPS – Uranquinty Structure Plan

4.10. Department of Primary Industries

The Department of Primary Industries (DPI) provided feedback on the subject development application on 13 April 2022. DPI raised a number of matters which have been addressed below.

The DPI identified that the subject site was located on the draft State Significant Agricultural Land map and asked for further consideration on agricultural production generally. The DPI also sought clarification around the impact on the land with regard to its Soil Capability Classification. Discussion regarding the State Significant Agricultural Land Map is provided in **Section 4.1** above and matters regarding the Class 3 Agricultural land have been discussed in **Section 3.5** above.

The DPI also made reference to the Department of Planning and Environments (DPE) *Large Scale Solar Guideline for State Significant Development.* It is firstly contended that the guidelines are only relevant for development identified as State Significant Development and therefore have limited consideration in 'Local development' seeking approval under Part 4 of the *Environmental Planning and Assessment Act.* However, the proponent agrees that the high level principles contained within this guide are important for consideration in any large scale solar generation development. The SEE considers a number of issues, around suitability of the subject site.

Whilst the proximity to the electricity network, available connection capacity or distance to towns, cities or other major energy users is important in site selection, environmental factors also play an important role. As discussed above, the site has also been selected as it is relatively unconstrained and is not impacted by matters such as natural hazards, agriculture, biodiversity, visibility, topography, waterways or other significant environmental constraints.

Discussion regarding class 3 agricultural lands has also been undertaken within this response and it is considered that this clarifies any misconception relating to the overall impact that solar farms genuinely have on class 3 agricultural land.

5. Next Steps

We trust that the completion of the public exhibition period and this information will now enable the Southern Regional Planning Panel to progress to a determination of this matter as soon as is possible.

Should you have any queries please contact the undersigned directly on 6021 0662 or david@habitatplanning.com.au

Yours Faithfully

David Hunter
Director