ITP Renewables
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Public Submissions	Item	ITP Response
Economic benefits	Increases in electricity prices	Some submissions queried whether solar energy would result in increased electricity prices. The electricity produced by the project will be exported into the National Electricity Market (NEM) and will contribute towards the reduction of wholesale electricity prices. Renewable energy is the cheapest form of new power generation, as noted in the NSW Electricity Strategy, and this will put downward pressure on electricity bills.
	Job creation and other economic benefits	Some submissions raised concerns that the proposal would result in limited employment opportunities compared to other forms of development. A head Engineering, Procurement and Construction (EPC) contractor will be selected to construct the project and ITP is keen to involve as many local individuals and contractors as possible. Already, ITP has received expressions of interest from several local businesses and will provide these contact details to the EPC contractor once selected to include in the project if possible. Interested individuals and contractors are encouraged to submit expressions of interest via the project website contact page: http://www.burrundullamsep.com.au/contact.php. ITP has also used local consultants for some of the specialist studies submitted with the Development Application. Local retailers and service providers also benefit from increased economic activity in the locality of the solar farm. Some submissions referred to other regional towns which have seen an economic boost due to the development of renewable energy projects, such as Wellington in rural NSW.
Planning instruments	Consistency with Local Environment Plan	A few submissions raised concerns that the *Mid-Western Local Environmental Plan (LEP) 2012* was either being ignored or contravened. The provisions of the LEP have been carefully considered in the Statement of Environmental Effects (SEE) and supporting studies. For more detail see section 4.3 of the SEE.

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	Consistency with Development Control Plan	Some submissions commented that the project is not compatible with Mid-Western Council's Development Control Plan 2013 Amendment 4 – Solar Energy Farms. As noted in section 4.4 of the Statement of Environmental Effects, the DCP relating to solar farms had not been adopted at the time the Development Application was lodged, and therefore does not apply to the proposed development.
Community engagement	Whether there has there been appropriate consultation with local landowners and the wider community	Some submissions suggested that there has not been adequate consultation with the local community. ITP has a detailed community engagement plan which was followed. ITP's policy is to engage with key stakeholders including landholders, local Council and key environmental and business groups. ITP consulted early with these stakeholders. The project also has a website, with information and FAQs and we welcome feedback. Please see http://www.burrundullamsep.com.au/faqs.php. Throughout the planning process, ITP has striven to listen to community feedback and address any concerns raised. ITP values the feedback received through the public exhibition process in June/July 2019, and has since made several changes to the project design to address concerns. These changes include: • Increasing the setback between the solar farm fence and the Castlreagh Highway to 200 metres; and • Revising the traffic access arrangements: the proposed access point for the project has been moved from the existing access point in order to decrease potential conflict with neighbouring property entrances and improve traffic safety.. ITP will continue to engage with the local community should the project be approved, to ensure that the community understands the project and its benefits.
Land use	Fragmentation and loss of agricultural land	Some submissions suggested that the project would result in fragmentation of agricultural land. Solar farming co-exists with agriculture as it allows regional communities to diversity their income sources, which can help effectively drought-proof farming businesses. In our agreements with landholders, we encourage the

		grazing of sheep underneath the panels. This dual use of land can in some circumstances result in improved growing conditions for grass, as the solar panels provide shade and reduce soil moisture loss. In terms of the question of fragmentation of agricultural land, we work very closely with our host landholders to understand their present land uses and future plans for the land. Reaching agreement on an area of land which is mutually acceptable and convenient is an important part of our initial negotiations. The site in question was identified by the host landholder to be the least agriculturally productive part of their land, being unsuitable for high-impact land uses such as cropping, high-intensity grazing, horticulture and viticulture. Furthermore, our proposal does not represent a permanent land use change, with the land being returned to agricultural purposes at the end of the agreed lease period. Please see the section on decommissioning below for more further details on the project's end-of-life arrangements. **Specific question:** • **Will the land need to be rezoned?** No, the land will not need to be rezoned. The property is zoned RU4 Primary Production Small Lots under Mid-Western LEP 2012. A solar farm is a use that is defined as electricity generating works. It is a permitted use in rural zones by *State Environmental Planning Policy (SEPP) (Infrastructure).*
	Proposed development at odds with rural character	Some of the submissions which raised objections characterised the project as industrial in nature and in conflict with current land uses. A solar farm is a use that is defined as "electricity generating works". It is a permitted use in rural zones by *SEPP (Infrastructure).* It is not an industry, but is an appropriate use of rural land, given land area requirements and that agricultural uses can continue to be carried out in and around the solar array. It does not conflict with the objectives of the rural zone – it will not fragment or alienate resource lands, and as it does not emit noise, dust or odours it is not in conflict with other primary production activities on neighbouring land.

		"Industrial activity" is defined by the Midwestern LEP 2012 as "the manufacturing, production, assembling, altering, formulating, repairing, renovating, ornamenting, finishing, cleaning, washing, dismantling, transforming, processing, recycling, adapting or servicing of, or the research and development of, any goods, substances, food, products or articles for commercial purposes, and includes any storage or transportation associated with any such activity". Energy production by way of solar photovoltaic panels is a type of primary production. Primary industries are those that harvest or extract raw material from nature. Various jurisdictions include oil and gas extraction and mining as well as agriculture as primary production. By extension this would include harnessing solar radiation for conversion to electricity. It cannot be classified as a secondary industry as there is no manufacturing or processing involved. The Australian Energy Update 2018, prepared by the Australian Government Department of Environment and Energy, makes reference to forms of renewable energy that produce electricity directly without a thermal component, such as wind, hydro and solar PV, primary energy production.
Property	The proposed development would directly impact on property values	Some submissions expressed concerns that the development would negatively impact property values. There is no evidence that solar developments negatively impact property values. A 2001 Senate inquiry into the Social and Economic Impacts of Rural Wind Farms concluded that The value of properties that are hosts to wind turbines should increase provided of course that the rights to rentals for the turbines are transferable with the sale of the property. The NSW Office of Environment and Heritage (OEH) commissioned Urbis Pty Ltd to undertake an investigation into the potential impact of wind farm developments on property prices in NSW. The report indicates "that the literature review of Australian and international studies on the impact of wind farms on property values revealed that the majority of published reports conclude that there is no impact or a limited definable impact of wind farms on property values". Studies of solar farms are limited; however, it could be argued that wind farms have a greater impact on the local population from a noise and visual aspect perspective, compared to solar farms.

Project location	Developments such as this should be located further from Mudgee	Some submissions expressed views that solar developments should be located in more remote areas. When selecting sites, we consider a variety of factors, including proximity to good quality network infrastructure, Council and State zoning restrictions, topography, and vegetation. Road access and availability of labour are also important considerations. The site has been selected for the proposed solar farm for its suitability to integrate with the existing electricity infrastructure and make best use of the natural resources which includes sunlight. Electricity generated by the solar farm will enter the local distribution network (rather than the long-distance transmission network) and provide power predominantly to the customers situated close to the solar farm, i.e. residents and businesses in the township of Mudgee. As part of our site selection process, several alternative locations were considered, including following early discussions with Mid-Western Council and community groups. Unfortunately, none of the alternative sites proved suitable.
Safety risks and network connection	Concerns of safety management including fire and hail risk	Some submissions raised concerns about safety management throughout the project lifecycle. Safety of the proposed development is paramount. Throughout the lifecycle of the project we are bound by Australian laws to comply with workplace health and safety standards. A Construction Environmental Management Plan (CEMP) will be prepared by the Contractor engaged for construction and operation of the project and will outline the appropriate measures they will take to mitigate any potential risks. The proposed development site is not mapped as being bushfire prone land. Nevertheless, a Bushfire Management Plan will be prepared which outlines the mitigation measures to be undertaken to minimise fire risks. We have included a minimumsetback of 10m between the fence to the solar farm infrastructure to allow for ease of access. Trees for vegetation screening are planted external to the security fence to reduce any fire risk within the fenced area.

		With respect to hail risk, the solar panels will be comprised of laminated tempered glass construction. We would not expect the disbursement of any glass or other material in the event of a hail storm.
Traffic and transport	Safety of the site entrance, including concerns around visibility	The vehicular access point to the site initially proposed was the existing access point in the northwestern corner of Lot 6 DP 1069441, approximately 2.4km from the intersection of Lions Drive with the Castlereagh Highway. However, consultation with Transport for NSW, in addition to feedback from submissions, suggested this posed a potential conflict with vehicles using the entrances to the adjacent Burrundulla Wines/Our Chow café, and the former nursery on the opposite side of Castlereagh Highway. In response, ITP commissioned Triaxial Consulting Pty Ltd to prepare an updated Traffic Impact Assessment Report for inclusion with the proposed amendment to the Development Application. The study examined the existing traffic conditions at the site and the impact of the proposed development on traffic. It then made conclusions and recommendations for the management of traffic at the site. The Report (read together with the preceding versions of the Traffic Impact Assessment Report) made the following conclusions and recommendations with respect to site access: • The intersection of the site access road would be located on a relatively straight section of the Castlereagh Highway and the available sight distance at the intersection is well in exceedance of the Austroad's requirements for Safe Intersection Sight Distance (SISD); • The proposed intersection be constructed to a BAL/BAR type intersection which can accommodate a 26m long B-double articulated truck; • Heavy vehicle deliveries will be scheduled to occur outside of the AM and PM peak hour traffic periods; and • A bus service to be utilised for construction workers, to minimise light vehicle movements to and from the site. ITP will carry out the project in accordance with these recommendations. The Triaxal traffic plan attached to the Development Application amendment included the BAR/BAL design for the intersection, showing that the proposed access point can be upgraded to accommodate 26m B-double trucks. This includes a new sealed shoulder which will be developed as per Austroads requirements.

		Some submissions raised concerns regarding potential conflict between project vehicles and children using school bus services. Heavy vehicle delivieries will occur between the hours of 10am and 2pm, with site construction personnel entering the site before (7-8am), and leaving the site after (4-5pm), the times at which school buses operate. Therefore, any conflict between site traffic and school children should be mitigated. This assumption has been based on school bus timetable information published by Ogden's coaches, in addition to the published operating hours of Mudgee Public School and Mudgee High School. ITP is pleased to have been able to work with the community and the Council to improve the project design to address these concerns.
Health	Toxicity of solar panels	Some submissions raised concerns about the toxicity of solar panels. There is no clear evidence that the leaching of toxic elements from solar panels during the operational phase is an environmental issue in Australia or abroad. Specialised solar cells, such as those used by the space industry, may use toxic metals (for example GaAs, GICS and CdTe cells). These are not used on commercial solar panel installations. Instead, silicon-based solar cells are used. These are free of toxic heavy metals. Panels chosen for the development will meet the Australian standard AS/NZS 5033 for photovoltaic (PV) modules. During the manufacturing process of a solar panel, the PV cells are typically encapsulated in a clear hardened resin with strengthened glass protecting the front side, as well as a back side made from a polymer such as Tedlar PVF material (Clean Energy Review, 2019). The completed panel is then further protected by an aluminium frame. These features protect the panel from the environment including extremes in temperature, rainfall, hail and humidity. A robust design, combined with a standard 25 year warranty ensures that the likelihood of cell material being exposed to the environment is very low. A Construction Environmental Management Plan will be put in place to provide clear instructions for routinely checking the panels after construction to ensure structural integrity and performance throughout the project lifecycle. Any panel deemed as defective would be dealt with in line with the requirements of the *Protection of the Environment Operations Act 2014* regarding panel recycling.

Noise	Concerns relating to noise during construction	Some submissions raised concerns about construction noise. ITP commissioned Muller Acoustic Consulting to prepare an updated Noise Assessment assessing the impact of the proposed new design. The Assessment acknowledged that there would be some noise impacts related to the proposed development. The Assessment was conducted in accordance with the following policies: • NSW Department of Environment and Climate Change, NSW Interim Construction Noise Guideline (ICNG), 2009; • Environment Protection Authority's (EPA's), Noise Policy for Industry (NPI), 2017; and • NSW Department of Environment, Climate Change and Water (DECCW), NSW Road Noise Policy (RNP), 2011. The Assessment modelled noise emissions for four scenarios: • Earthworks for internal road and compound construction including the stripping of topsoil and unstuiable soil and the placement and compaction of road base; • Earthworks involving trenching for cabling; • Piling of panel supports; and • Assembly of the panels. The Assessment envisaged that all four construction scenarios have the potential to occur simultaneously at up to two locations across the site. While construction noise is expected to be noticeable, the degree of impact is expected to be low and mitigation measures will be put in place by the construction team. The Assessment recommended the following mitigation measures which will be implemented: • Development of a construction noise management protocol; • Using localised mobile screens or construction hoarding around plant to act as barriers between construction work and receivers; • Operating plant in a conservative manner; • Selection of the quietest suitable machinery available for each activity;

		• Avoidance of noisey plant/machinery working simultaneously where practicable; • Minimising impact noise wherever possible; • Utilising a broadband reverse alarm in lieu of the traditional high frequency type reverse alarm; • Providing toolbox meetings, training and education to drivers and contractors visiting the site during construction so they are aware of the location of noise sensitive receivers; • Signage to be placed at the front entrance advising truck drivers of their requirement to minimise noise both on and off-site; and • Utilising project-related community consultation forums to notify residence within close proximity of the site with project progress. ITP will carry out the project in accordance with the recommendations made in the Assessment.

	Concerns relating to operational noise	Some submissions raised concerns about operational noise. ITP commissioned Muller Acoustic Consulting to prepare an updated Noise Assessment assessing the impact of the proposed new design. The Noise Assessment acknowledged that there would be some noise impacts related to the proposed development. While construction noise is expected to be noticeable, the degree of impact is expected to be low and mitigation measures will be put in place by the construction team. Long term noise impacts are negligible, with tracking solar PV rows moving at a slow rate producing minimal noise. The only noise produced once the development is operational will be from the substation and inverters, which will be inaudible with the appropriate buffer distance to residences. The Assessment concluded that operational noise criteria would be satisfied at all receivers. **Specific questions:** • **Will the panels and related infrastructure create noise or vibrations?** The solar panels do not create noise. The solar panels will be connected to four 3MW inverters which generate a gentle hum. The Noise Assessment assessed the operational noise and concluded that operational noise criteria would be satisfied at all receivers.
Biodiversity	Fenced area inaccesible to wildlife	Several submissions raised concerns about the fenced area being inaccessible to wildlife. The SEE dated 13 June 2019 provides details of the biodiversity assessment that was undertaken. A desktop biodiversity assessment was carried out to determine the potential impact on threatened species and endangered ecological communities, supported by site inspections carried out in April and May 2019. The following sources of information and data were used to determine whether any threatened species or endangered ecological communities are likely to occur on or near the site:

		• SIX Maps aerial imagery dated November 2011; • Mapping accompanying Mid-Western LEP 2012; • BioNet Atlas of Living Australia; • Mapping by the NSW Office of Environment and Heritage (Central West Lachlan vegetation mapping, Native Vegetation Regulatory Map, Biodiversity Values Map); • Schedules to the Biodiversity Conservation Act 2016; and • Protected Matters Report of the Environment Protection and Biodiversity Act 1999. The proposed project site is on land that has been largely cleared for agriculture and extensively grazed. While ITP acknowledges that certain wildlife (e.g. mammals and marsupials) will not be able to access the enclosed fenced area, due consideration has been given to all relevant legislative and regulatory instruments, and any impact from the development on significant or threatened fauna is not considered likely.
Visual	Visibility of the project	ITP has carefully considered the draft conditions raised by the council about the visual impact of the proposed development and has updated the design. The overall footprint of the project as been reduced. This has resulted in the same generation capacity to be installed in a smaller area. This has mostly been achieved by using more efficient solar panels and consolidating some rows of panels. To summarize the changes: • The number of panels has been reduced from 31,416 to 24,360; • Rows of panels have been moved away from some neighbours; and • The distance to the northern boundary has been increased from 99.4m to 197.4m. Some submissions also raised specific concerns about the visual impact of the security fence. ITP appreciates that the appearance of the security fencing around the proposed development may not be visually appealing but it is a safety requirement under Australian Standards for high voltage electricity generators. The fence has been specified to these standards. The fence along the Castlereagh Highway is to be placed between a line of shrubs and the first array of solar panels so that it is screened from passing traffic by the vegetation. Landscape screening is proposed to be placed

		along sections to the east, west and south of the arrays. Endemic native plants will be selected to use for screening that grow to a maximum height of 2.5 metres to ensure that the solar resource is not impeded. Arrays are to be setback a minimum 10 metres from perimeter security fences and 20m from vegetation screening. The fence is set back 200m from the northern boundary, 30m from the western boundary, 128.5 – 250.5m along the southern boundary and 54.5m from the existing access lane on the eastern boundary. ITP acknowledges that these changes have meant that the array is slightly closer to the neighbouring properties to the south of the project. These changes, however, are in response to concerns raised by the community regarding the visibility from Caslereagh Highway.
	Concerns about adequacy of landscaping	The proposed landscaping has been criticised for a variety of reasons, including the following: • The vegetation screening is spaced too far apart, is not tall enough, and lacks diversity in types of species; • The use of shade cloths; • The time it takes for trees to mature; and • Successful screening will require ongoing management. It is proposed to plant native shrubs that will grow to a maximum height of 2.5 metres and to provide 5 metres separation between each plant. Seedlings or young plants will be used as they have a higher survival rate and it is difficult for mature plants to gain traction and survive particularly in dry climatic conditions. Endemic species will be selected on the basis of size at maturity to ensure that each plant meets horizontally to provide effective screening. Plantings will be maintained and watered by maintenance crew on a regular basis, i.e. every two to three months. Native species will be selected that do not require frequent water once established and mature. Dead or removed vegetation will be replaced with plants of the same species and maturity. Shade cloths are commonly used in various rural applications such as protecting orchards, vineyards and garden centres. **Specific questions:** • **What happens after the end of the life-span of plantings?** An Operations & Maintenance (O&M) contractor will be engaged to manage the project during its lifespan. Maintenance is expected to be carried

		out quarterly by a crew of 2 to 3 people. The O&M contractor will be responsible for maintaining plantings, and replacing plantings at the end of their life-span. • **If they do grow won't they block off the sun to the solar panels?** The landscaping will be maintained at a maximum height of 2.5m and will also be located outside the security fence. This will ensure that the landscaping provides a visual screen without shading the panels. • **If the property is going to be grazed, will animals eat the screening plants?** Plantings will be protected by barriers and the maintenance crew will ensure that any plantings which do not survive are replaced as soon as possible.
	Concerns about the Visual and Scenic Amenity Assessment	Some submissions raised concerns about the Visual and Scenic Amenity Assessment included in the SEE, including: • Accuracy of the distances shown in Table 3: Viewpoint Impacts; • The distance used to determine potential viewpoints in the assessment; • Relevance of the photos included; and • Relevance of the photomontages included. The visual assessment was carried out using the RMS guideline *Environmental Impact Assessment Practice Note – Guideline for Landscape Character and Visual Impact Assessment* (EIA-N04 Version 2-0 released on 28 March 2013). This methodology has been validated by the Land and Environment Court. The assessment considered visual receptors within 2km of the site including residences and road users. While there were a greater number of residential/commercial properties considered, many were discounted based on mature trees which would act as visual barriers between the site and receptor. Measurements from viewpoints are consistent in both the visual assessment and the Glint and Glare Assessment. The distance is calculated as a straight-line from the centroid of the PV array area, to the point where the residence is located. Regardless of the distance, the visual assessment takes into account the sensitivity of the viewpoint to the development and ranks that according to the matrix.

		The findings of the assessment were that distance separation and proposed screening along the boundaries of the array would assist to mitigate the impact to these viewpoints. Roadside vegetation and the sloping and undulating topography of the land within a two kilometre radius would serve to minimize visual impacts to most viewpoints. The photos included in the SEE demonstrate visibility of the site from a number of locations. Other than the photo taken from the private road, all photos are taken from public land as it was difficult to gain access to private property to take photos. Images taken from the Castlereagh Highway show that the development area is partly screened from the view of passing motorists. Due to the complexity of the undulating landscape and the solar farm design, photomontages can be difficult to produce and do not necessarily provide a realistic view of how the constructed solar farm will look. A number of photomontages were provided with our application, these were completed to ensure that we would have minimal impact on the health and safety of road users. All development, of any kind, be it new dwellings in a rural landscape or the planting of crops, has a visual impact. The planning principles established by the Land and Environment Court have been addressed in the visual assessment and the photomontages indicate that the placement of the solar farm in a rural context is acceptable and appropriate. These visual impacts have minimal impact on the view corridors of surrounding lands and are considered acceptable given the contribution to reducing greenhouse gas emissions and mitigating the future effects of climate change.
Glint and glare	Reflective glare concerns	Reflective glare concerns were also raised in several submissions. A total of 27 residential and commercial observation points were identified as potential receptors of the site. It has been identified that a total of five observation points may receive any glare and with one in particular receiving a very small amount. The GlareGauge analysis predicted up to 15 minutes of glare around sunrise at these receptors. Although one (OP27) is located such that it would receive more glare than the other receptors, it is actually unlikely to receive any since there are mature trees already planted along the western boundary of the property.

		To reduce potential glare at these observation points, it is recommended that trees be planted around the north-western and south-western corner of the site boundary. Additional vegetation screening could be considered around the remainder of the site boundary to minimise the visual impact to road users and any other nearby properties. The results of the GlareGauge analysis at each of the observation points are summarised in Table 3 of the Assessment. Many residences will also not have direct view of the solar farm due to visual obstruction from trees and other structure. The distances in these tables are calculated from the centroid of the PV array to nearby houses. The study also concluded that existing roadside vegetation and structures are expected to provide a physical obstruction between the solar farm and other potential receptors, further minimising the visual impact of the project.
Water	Concerns about groundwater vulnerability	Some of the submissions raised concerns about groundwater vulnerability, and the potential for erosion from the project to impact on groundwater. ITP commissioned Golder Associates Pty Ltd to prepare an updated Water Assessment based on the updated design. The study made the following conclusions: • Although listed as groundwater vulnerable in accordance with LEP, proposed on site activity is not expected to materially to contribute to any regional groundwater issues. • Potential adverse surface water-related impacts to the site include; site accessibility and inundation; downstream sedimentation. The Assessment recommended comprehensive site drainage and water quality controls which will be implemented for the construction and operational phases of the project. These include: • Development of a site erosion and sediment control plan in accordance with the Managing Urban Stormwater: Soils and Construction Vol 1 (Blue Book) (DECC, 2008); • Development of site drainage design incorporating detention basins and sedimentation management structures where relevant; • Catch drains to be located downslope of any proposed road works;

		• Installation of location appropriate sediment fences; • All stormwater collection points to have appropriate sedimentation and erosion controls; • Ongoing inspections to be carried out; • Flat land erosion control to include erosion control blankets, gravelling, mulching, soil binder, turfing and revegation; and • Level spreaders at locations where concentrated flow is discharged offsite to ensure sheet flow like conditions are maintained. ITP considers erosion and siltation due to the construction of a solar farm to be no more likely than the existing land management process that would be in place for the site. Although rainfall may be intercepted by the surface of the panel prior to hitting the ground, this has little impact on the rainfall energy and due to the spacing of the solar arrays (minimum row spacing of 6m), the intercepted rainfall is spread over a large area of infiltration. The large vegetated surface area below the panel arrays will absorb rainfall and minimis runoff potential.
Decommissioning	Assurance of decommissioning and rehabilitation plan	Some submissions raised concerns that the project would not be decommissioned at the end of its lifespan. ITP is responsible for undertaking any decommissioning requirements at the end of the project life. This is mandated by the following: • Long-term contracts with landholders which include obligations to remove all equipment from the site and remediate the site to the same condition and repair as it was prior to the construction of the project. This includes removing permanent foundations and all above-ground structures; • Conditions of Development Approval which govern the project prior, during and after construction. In our experience, it is common for these conditions to include an obligation to remediate the site to Council's satisfaction; and • Terms of the generation licence granted from Essential Energy NSW which must be granted prior to any operations. Under the terms of this agreement, generators such as ITP must comply with disconnection and decommissioning provisions under the National Electricity Rules **Specific Questions:**

		• **Why is there not a plan for decommissioning this site?** ITP will prepare a Decommissioning Plan outlining the procedures and activities to be implemented for the decommissioning of the site. • **What is the cost of decommissioning the site?** Industry experience has shown that end-of-life solar farms have a scrap value higher than the cost of removal, and are therefore unlikely to be abandoned. • **What happens if the company is liquidated and walks away from the site? Will the Council make good the land?** ITP is responsible for undertaking any decommissioning requirements at the end of the project life. These obligations come from land contracts, conditions of approval and terms of agreements with Essential Energy. If for any reason ITP was liquidated or unable to fulfil obligations, the landholder would be responsible for fulfilling the terms of the Decommissioning Plan and would be able to sell the equipment. **I**ndustry experience in Australia has shown that end-of-life solar farms have a scrap value higher than the cost of removal, and are therefore unlikely to be abandoned. • **Is the local government body at the time going to accept 24,000 solar panels for recycling or land fill?** Currently, there is a commercial scale recycling plant in South Australia (Reclaim PV Recycling) and we anticipate that options will increase over the life time of the project.
Financial viability	Concerns that the project would become a stranded asset	One submission raised concerns about the lack of financial data or economic evaluation provided for the project, which could lead to the project becoming a stranded asset. ITP and our investors have conducted financial due diligence which has confirmed the financial viability of the project. With respect to the concern that the project would become a stranded asset, as detailed in the section above on decommissioning, ITP has obligations to decommission the project under long-term contracts with landholders, likely Conditions of Development Approval and terms of the generation licence granted.
Tourism	Impact on tourism	Some submissions raised concerns that the project would adversely impact on tourism to the historic town of Mudgee and the surrounding region. However, other submissions (to the original DA) highlighted potential benefits in terms of Mudgee demonstrating a forward-thinking and future-focused approach to energy supply. Industry experience has shown that renewable energy projects can provide a draw-card for local tourism. Public sentiment continues to shift towards renewable energy projects, particularly among younger people who are

		concerned about the future impact of climate change. Mudgee attracts a wide variety of visitors to the region, leaning heavily on its reputation for excellent food and dining experiences. The presence of a solar farm near the main approach need not detract from any visitor's appreciation of the Midwestern region. The project is also expected to provide an economic boost for local retailers and businesses, and generate up to 50 jobs during construction.