



ANNETTE PIPER

OBJECT

Submission No: 179767

Organisation: CWO REZist Inc.	<p>Key issues: Land use compatibility, Visual impact, Traffic and transport, Social impacts, Temporary accommodation, Other issues</p>
Location: New South Wales 2843	
Submitter Type: I am a member of the community with a view about the proposed development	
Attachment:	

Submission date: 6/14/2024 4:42:32 PM

CWO REZist thanks the Commissioners for the opportunity to make a submission on Birriwa Solar.

We would like to bring attention these points in DPE's Assessment, that we believe could affect the viability of the project and/or the excessive negative impacts on neighbours and local communities:

Site and Surrounds

The proponent (and therefore the department) has stated that the site is used for grazing and low intensity dry land cropping and the land is LSC Class 5 and 7. We have noted however that in the current season, the crops on the project site are superior to many neighbouring properties and it is currently running a higher than average number of livestock. This indicates that the land type, is likely to have been misidentified by the proponent's consultants (which is what DPE believes and does not undertake their own independent soil testing), or samples have been taken from occasional poorer soil areas. We request that before considering approval, an independent agricultural specialist be approached for a clear assessment on production capability (agricultural) and soil testing so that valuable agricultural land is not compromised by the solar folly.

Several watercourses traverse the site. There have been no efforts by the proponent in regard to safeguarding these watercourses in the case of PV panel breakages or damages where potentially toxic chemicals within the panels could make their way into these watercourses and potentially poison the land within and outside of the project site. Upon request by DCCEEW they agreed to a 30m buffer to White Creek. This should be made a condition on consent, not just for White Creek but for ALL watercourses on the site. The recommendation from DPI Fisheries regarding riparian buffer zones should also be a condition of consent.

The number of non associated residences within 2km of the project (22 residences) is alarming. The proponent has not managed to get the agreement of these neighbours/local residents who will be most affected. This indicates that the neighbours are severely concerned and do not approve of what is going to be happening on their doorstep. The proponent obviously has no social licence close to the project site which is an unacceptable flaw in their project.

We also note that the project attracted 85 objections to the original EIS and 45 objections to the amendment. There were NO supporting submissions. This is once again evidence of a lack of acceptance in the district and no social licence.

Cumulative Impact

DPE's report states there are 16 SSD projects within 25km of the site. This will result in the district's landscape will be changed from one that is predominately rural agriculture to one that is predominately industrial. This is unacceptable to the neighbours of the project who will find their landscape changed without their consent. On this alone the project should be rejected.

Energy Context



DPE's statement that the project will assist Australia in meeting emissions targets and meet the requirements of AEMO's ISP etc. (as outlined in 2.3 and 5.1 of the DPE Assessment document), is concerning considering presenters at the IPC meeting in Dunedoo proved these inadequate and false (refer presentations by K.A. LOUGHREY LtCol(Ret'd) BE Mech(hons), psc, jssc, Grad Dip Strategic Studies and G.A. PIPER BE(Aero), MRAeS, chair National Rational Energy Network) . This should therefore NOT be considered by the IPC as reason to approve the project.

Department's engagement on the EIS

The Department visited the site last year and visited surrounding landowners. DPE have admitted that they are there just to listen but the only thing they can really make any decisions on is visual impact, every other area of the EIS is farmed out to other government departments. These departments rarely if ever visit the site, with most of their assessments restricted to desktop studies. This is insufficient in the light of the impacts on neighbours and the community.

Council Submissions

DPE state that Warrumbungle Council objected to the proposal. The Mayor of Warrumbungle Council also spoke to the IPC and we support his recommendation/request.

Loss of Agricultural Land

Para 82 states that the proponent is committed to investigating the possibility for continued grazing on the subject land. This is a feel good statement by the proponent as it is quite clear that the grazing of sheep on an industrial solar site is never going to be successful. The grazing of sheep under PV panels is based on a trial in Parkes, specifically for the Parkes Show. This trial showed that there was a lack of livestock infrastructure (eg. troughs/dams for the sheep); mustering and access restrictions which in the case of weather considerations (eg. grazier's alerts or excessively hot weather) or animal health needs (eg. flystrike) means that necessary animal husbandry may not be able to be undertaken in a timely manner; and in the most horrifying of all animal cruelty examples, the wool of some sheep got caught in the rotating panel mechanisms that skinned the sheep alive and resulted in their deaths. There are other considerations such as burrs and weeds affecting wool, lack of pasture improvement reducing available feed and suitable fencing that will all negatively affect this proposal. This therefore needs to be discounted by the Commissioners in their appraisal of the project.

Para 83 contains incorrect data which DPE corrected at the IPC.

Para 85 states the potential loss of a small area of grazing land in the region. As stated earlier, the project site currently has some of the best crops in the district and has a high carrying capacity compared to other properties. Taking this property out of production will have a negative effect on the local community and on a cumulative scale with other properties taken out of production for similar projects will negatively effect the wider district and the State of NSW. Therefore Para 86 is incorrect it is not an effective and compatible use of the land.

Para 87 is capable of being returned to usable agricultural land following decommissioning. This is only correct if ALL infrastructure, including underground infrastructure is removed at the decommissioning point, regardless of what the landowner at the time thinks. This should be a condition of consent.

Visual Mitigation

Screen planting has been suggested as sufficient mitigation. We request that all screen plantings be undertaken during the construction period, with established trees/shrubs of at least 2 years growth, with a watering and care schedule undertaken by the proponent until the trees/shrubs are at mitigation height. The proponent should continue to be responsible should there be any loss in the trees/shrubs in the vegetation



screening and need to replace the lost tree/shrub with a similar sized tree/shrub. This should be a condition of consent.

Conditions of Consent from DPE

ALL conditions of consent imposed by the IPC, need to have a plan in place for cross checking that these conditions are adhered to.

END
