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OBJECT

Submission No: 179724

Organisation:		Key issues: <i>Land use compatibility, Visual impact, Social impacts, Other issues</i>
Location: <i>New South Wales 2795</i>		
Submitter Type: <i>I am a member of the community with a view about the proposed development</i>		
Attachment:  <i>Submission.pdf</i>		

Submission date: 6/14/2024 2:17:06 PM

Please see attached, I have resubmit as a PDF as I could not find my original submission even after recieving a confirmation email and reading through all of the submission on the website.

I object to the construction of the Birraba Solar farm.

After watching the public meeting in full, I feel that I had a duty to lend any support to the community's cause as I possibly could. With many of the issues raised by the community having been experienced by myself, who is in a similar situation with another developer in the Central West.

I am genuinely concerned that the community consultation process has been hollowed out to such an extent that these projects will go ahead regardless of the impacts on the community or neighboring landholders. Further, unfortunately I am of the belief that the submissions process is only in place to give the illusion of individuals actually having a say on a project. Nevertheless, I will still write this submission.

Issue 1

I would like to understand how the Commission determines if a project, in this case Birriwa Solar Farm, has met the threshold of gaining social licence?

After watching the public meeting in full as well as learning that the vast majority of public submissions on the project were negative, it appears there is no social licence for the project, if this is the case then how can it be approvable?

This leads me to feel that the community consultation process is not genuine and is only in place as a "box ticking exercise" and regardless of the outcome the project will proceed.

Can the Commission please describe the process of determination of social licence and how it is deemed to have been gained in this instance?

Issue 2

How is it deemed acceptable to have very targeted financial benefits flowing to host landholders who in many cases will likely leave the area and not endure the impacts of the project that they are benefiting from?

How is this fair and equitable if neighbouring landholders are forced to endure the impacts of the project with little or no compensation for the imposition? I note that neighbouring landholders will likely have no opportunity to sell due to significantly reduced land values or in worst cases their land becoming unsaleable.

This approach strikes me as the developer being sanctioned by the Government to negatively impact neighbouring landholders while in effect transferring this loss of wealth to the host landholders.

Can the Commission please outline how this issue is managed and what their view is in relation to reasonable compensation to neighbouring landholders? I note another recent case of a very similar situation relating to Hills of Gold Wind Farm development.

Issue 3,

Issues raised by the community and local Council regarding creation of the REZ without appropriate consultation appear to be well founded. This in combination with the LEP strict reading seem to indicate that developments of this type are of dubious compatibility with a largely rural area.

Issue 4,

There appears to be a significant short coming in the way project approvals for large scale renewables are considered only on a case by case basis. Surely the Federal and State Governments, Local Councils, the Department of Planning, and the Commission should be looking at the cumulative impacts of rolling out the entirety of

the proposed total generation and storage? Otherwise we will look back in 10 years time and realise we destroyed our natural landscape in an manner akin to "death by a thousand cuts".

Can the Commission please provide their view on this matter?

Issue 5,

The presentation by Mr Rick Coless raising the issue of Dryland Salinity due to the removal of all existing vegetation, particularly in the case of large scale solar installations certainly raises an important issue. It seems we are taking retrograde steps back to an archaic approach of completely denuding landscapes similar to the early agricultural practices that proved to be so ruinous to our environment. I cannot see how in the eyes of any determining body that this approach would be deemed acceptable.

Issue 6,

Why is local council not part of the determination process? It seems they only have the ability to make a submission similar to any other community member. How can this remain the case? Local councils better represent the needs and sensitivities of local communities that they serve, certainly more so than disconnected state and federal Government departments can. Can the commission please provide their view on the role of Local Councils involvement in significant projects such as Birriwa Solar Farm?

Issue 7,

Given the local communities are shouldering the burden of these projects and their impacts and the public are heavily subsidising large scale renewable investments there is a necessity for the proponents to be open book with their finances. It is of paramount importance that we are shown exactly how much revenue will be generated by the project, how much of this will flow back to the communities who are impacted, and how much flows to State and Federal Governments as taxable revenue. In addition it is a necessity that the finance arrangements are shown, my concern is that these projects likely do not provide an actual benefit to the Australian public and are only made viable by hefty subsidies and questionable financial arrangements that offshore any profits via shady accounting processes that result in minimal or no tax being paid in Australia. How does the Commission stand on this matter? Is the Commission satisfied that appropriate controls are review processes are in place to guarantee the Australian public is getting a fair return?

Issue 8,

Rehabilitation bonds appear to be not applied to these projects, can the commission please provide context around this and evidence showing how the proponents will be held to rehabilitation requirements at end of life of the project. In my view I cannot see how anything less than a bond or bank guarantee system in place with the State Government would give the commission any comfort on this matter.

Issue 9,

Transmission lines. It is not fair and reasonable that landholders that host the private development receive significant compensation (often many times the land value) while landholders who host the transmission lines that service the development receive very little in the way of compensation and also have the threat of compulsory acquisition thrust upon them. How does the Commission view this discrepancy in compensatory arrangements? What is being done to reconcile this injustice?

Issue 10,

Environmental impacts, land clearing on a huge scale is proposed. How is this compatible with sustainability goals? It seems the environment is being substantially

damaged in the name of saving the environment. My view is the first step in minimising further environmental decline is to save and nurture whatever we still have left and then look at ways to provide reliable power generation that does not further diminish what we have. Wholesale clearing and covering of the landscape with solar panels is not compatible with these goals.

Issue 11,

The social, financial and environmental costs of these projects are being borne by the local communities while any profits made are being taken by the proponents. This does not seem like a fair approach. If for example these assets were publicly owned, then at least profits would be fed in whole back into funding of public infrastructure such as schools, roads and hospitals rather than flowing to offshore commercial interests. How can the Commission justify approval of projects such as this, which have significant impacts on the local communities?

Issue 12,

Procurement of the bulk of the hardware required to construct Birrawa solar farm will be from China. How is this compatible with statements by the proponent that they have a local procurement first policy? It seems this statement is nothing more than a "feel good" selling point in the EIS and project plans when it is abundantly clear that very little will be available locally.

What is the Commission's view on this?