



S ARMSTRONG

OBJECT

Submission No: 179538

Organisation:		Key issues: <i>Land use compatibility, Visual impact, Traffic and transport, Social impacts, Temporary accommodation</i>
Location: <i>New South Wales 2844</i>		
Submitter Type: <i>I am the owner or a tenant of a neighbouring property to the proposed development</i>		
Attachment: <i>S Armstrong submission</i>		

Submission date: 6/13/2024 10:04:44 PM

Please find submission attached.

S Armstrong submission to Birriwa Solar - Reference number SSD-29508870

INACCURACIES WITH THE DEPARTMENT OF PLANNING, HOUSING AND INFRASTRUCTURE ASSESSMENT REPORT

Executive Summary page ii – no mention of the accommodation camp, an aspect that will have significant impact on the community.

Executive Summary page iii – ‘*available capacity on the existing electricity network*’ there is no existing network, proposed development is to connect to the Central-West Orana REZ Transmission, SSI-48323210 network, application not yet determined.

Table 1 Main aspects of the project, page 3, decommissioning and rehabilitation, assessment report states ‘*removing all infrastructure*’, EIS states underground cabling will be left, rendering the site challenging for future agricultural pursuits including the laying of water pipe infrastructure, for stock watering.

74. page 21 - The land use is not permissible under the Mid-Western Regional Local Environmental Plan 2012, rather its permissibility is achieved under the State Environmental Planning Policy (Transport and Infrastructure) 2012, a state environmental planning instrument that has no regard or understanding of the local context, it provides inappropriate blanket permissibility across the state.

77. page 21 - the introduction of a solar energy development reduces direct and indirect employment in the local economy, from agricultural sowing contractors, shearers, farm hands, stock carriers to reduced spend in local rural supply stores.

80. page 22 – low intensity dry land cropping is productive in our region due to the generous rainfall. Dry land cropping doesn’t rely on irrigation from underground water sources, accordingly are extremely sustainable and valuable to the state.

81. page 22 – the report fails to document the hectares of land mapped as BSAL and land classes 1, 2 and 3, within our community, there are limited, accordingly, classes 4-7 are valuable to our local economy and play an important role in a mixed farming enterprise.

82. page 22 - ‘*ACEN has committed to investigating the possibility for continued grazing...*’ this vague statement indicates that our possible future neighbour is not committed to the agricultural industry. With removal of vegetation (stock shade), farming water infrastructure and internal fencing, it will be near impossible to continue agricultural practices. If they do manage to run sheep on the site, it will be at much lower stock carrying capacity than the site is capable of currently.

Further we have observed chemical spraying to maintain weeds at the Beryl Solar development, after 20-30 years of spraying, the soil profile will be so impacted that it impossible to rehabilitate to it’s current state. Such chemical spraying will impact ground covers, resulting in soil erosion, as seen at the Stubbo solar development.

83. page 22 – this comment fails to detail the breakdown of land and soil capability mapping classes and what the economic value to the community, state and nation this land and its loss represents.

84. page 22 – DPI Agriculture has considered the development in isolation, it has not considered or commented on the cumulative loss of agriculture. The DPI Agriculture should have been

engaged at the declaration of the REZ itself and then could have appropriately commented. The DPI Agriculture has the opportunity to consider the cumulative loss with the application of the Central-West Orana REZ Transmission, SSI-48323210 network. It is the transmission line that is facilitating this and many of the other energy generating developments.

85. page 22 – the economic impact of the loss of agricultural land has not been established, it is therefore impossible to *'balance against'*. The assessment report fails to details what the 'economic benefits' are?

87. page 23 – when the development has exchanged ownership multiple times and the developer walks away from the site, how can we be certain that the landowner will have the funds for decommissioning and for the expensive task of rehabilitating the soil? The rehabilitation of the soil will take many years, resulting in lost agricultural income for the landowner.

88. page 23 – seasonal crop stubble burning is a standard agricultural practice which the NSW rural fire service permits. Our established agricultural practice next to industrial development are not compatible. This development will create public liability insurance risks.

94. page 23 – Merotherie Road is proposed for emergency, the application fails to address the suitability of this road, it is frequently impassable due to flooding. This highlights the inappropriateness of locating the workers accommodation so far from the highway. The location has been selected due to landowner willingness rather than site suitability. Further, if multiple workforces (not just Birriwa) utilize this workers accommodation, it is likely this inappropriate emergency access will be relied upon.

108. page 25 – the assessment report and EIS documents fail to consider the volume and timing of truck movements associated with agriculture from the port of Newcastle along the Golden Highway and to various stockyards.

114. page 26 – the glint and glare impacts detailed in EIS documents don't reflect the reality we observe of the Stubbo solar development under construction. Further, photographs don't appropriately capture the landscape and have been taken on cloudy days. Initially visual impact was of significant concern, but over time, with the understanding of the true impacts of the development, there are matters of greater concern.

126. page 28 – if the development is to be approved, the chain wire development fencing should be black in colour, rather than galvanised colour.

152. page 33 – to address worker accommodation, a camp was proposed in the amendment report, I still question if ACEN can 'make' their construction workforce stay in the accommodation camp? It is anticipated that there will still be impacts on local housing supply.

153. page 34 – *'DRC has capacity and is willing'* *'accept most'* this again highlights the vagary of the documentation submitted and inadequacy of the process this development has gone through, there is uncertainty around many aspects of the development. A solar development near Wellington burnt its waste, accordingly rushing this assessment when there are so many unknown may lead to these poor outcomes.

153. page 34 – I can't get an appointment to see a general practitioner for 6 weeks, I travel to Sydney for medical appointments due to the wait time in the region. This region can't

accommodate all these accommodation camps. If a qualified nurse can't be secured, will the facility be closed down?

154. page 34 – there are too many insurmountable issues to be determined and resolved post-approval. These must be detailed and resolved prior to any future approval. Again, how can ACEN ensure all employees will be accommodated in the accommodation camp rather than market housing? A condition of employment? Who is resourced to regulate this?

168. page 45 – *'on balance, the Department considers that the project is in the public interest...'* as detailed above there are significant gaps in information, especially in relation to the economic impact from the loss of agricultural land, accordingly it is impossible to determine whether the project is in the public interest.

Appendix H – Consideration of community views, page 47 –

incomplete sentence *'The cumulative loss of agricultural land for this project and other approved solar projects in the region...'* this highlights the haste and inadequacy of the assessment project. Further, the Central-West Orana REZ Transmission, SSI-48323210 network is the catalyst for other energy generation projects, including wind. The solar, wind and transmission projects all result in the cumulative loss of agricultural land, this assessment report is silent on this. Accordingly, the determination of this project should be delayed until the Central-West Orana REZ Transmission, SSI-48323210 network assessment is complete and the cumulative loss created by the transmission line can be determined.

'the site is intended to continue to be used for grazing...' the assessment report fails to detail the difference in the stock carrying capacity currently to post construction and the direct and indirect economic impacts.

The assessment report fails to consider the inconsistency with Objective 19 of the Central West and Orana Regional Plan.

Again, incorrect reference to *'available network capacity'*. There is no network capacity, not even enough capacity to support the accommodation camp, diesel generators will be relied upon.

'the Department is satisfied that the project would not result in any significant reduction in agricultural productivity of the region or of local agribusiness' the direct and indirect economic impacts have not been detailed in any documentation, this has not been quantified, how can the Department be satisfied?

FURTHER MATTERS FOR CONSIDERATION

The following matters have been raised in previous submissions, discussions with ACEN and EnergyCo:

Large-Scale Solar Energy Guideline

The application of the Large-Scale Solar Energy Guideline is inappropriate in a region subject to many applications, the application of the guideline is more appropriate for standalone developments. The guidelines did not anticipate developments of this scale, let alone the cumulative impact of multiple within one REZ. Guidelines should have been drafted to guide the development of the REZ.

Housing

Large rural properties are being tied up in the planning process for these projects. Housing on these properties once provided a form of affordable rental housing for communities, this is no longer. This has flow on effects to reduced population in the rural areas for local RFS volunteers, informal surveillance and populating school bus runs, just to name a few. Housing in the town of Dunedoo is very limited and cannot handle an influx of workers, when they choose not to stay in the accommodation camps.

Inappropriate scale of projects

The REZ is generating projects that are of such an enormous scale, they do provide income for the landowners (that doesn't not account for lost agricultural income), however due to their significant scale, including minimal setbacks from boundaries, they create unacceptable impacts on neighbouring properties. This is creating friction between members of the communities and families.

Solar developments remove land from agricultural production, wind developments reduce the lands productivity and transmission lines bisect agricultural holdings, resulting in the inability of the farm to be run as one due to the physical limitations the transmission lines represent.

Developers with limited social licence

We observed the plumes of smoke generated by the burning of vegetation making way for solar developments, however this is no mention of this in any EIS documentation.

Inappropriate isolated location of accommodation camp

The proposed location of the accommodation in a remote location, such a significant distance from the highway is not appropriate. Ambulance response times are poor/nonexistent, access and knowledge of the local road network is nonexistent due to the transient ambulance paramedics. I had to drive my unconscious son 25 minutes to emergency at the Dunedoo MPS as the ambulance would not make it. We were then transported via ambulance to Dubbo Base Hospital. The proposed location of the accommodation camp, in a location even more remote from where I live, we don't need a people residing, even temporarily that remotely.

Uniqueness of the region

Our district is unique to NSW with the combination of soil profiles and generous annual rainfall supportive of sustainable mixed farming operations located in close proximity to markets. It is these mixed agricultural farming operations that are and will continue to be financially sustainable into the future.

Loss of agricultural land

Since the proposed and subsequent declaration of the REZ I have seen the removal of agricultural land from production and the significant reduction in productivity of agricultural land, due to either the construction of electricity generating developments or land (many hundreds of hectares) subject of state significant development applications going through the planning process, with landowners not investing into the lands agricultural capability. The resulting supply chain impacts are being felt daily.

I have not seen any documentation that determines or even discusses the economic loss directly attributed to the elimination or reduced productively of agricultural land to our

communities. Removing agricultural land and reducing the productivity of agricultural land has economic impacts to the following industries –

- Spraying contractors (fertilizer application/weed control)
- Stock carriers
- Commercial stock yards
- Stock and station agents
- Shearers
- Sowing contractors
- Fencing contractors
- Agricultural supply business
- Mechanical service and repair
- Farm employment

Methodology for site selection

There has been no methodology for site selection for developments/projects. The wind and solar developments are located on land of landowners who were targeted by developers at the end of the longest drought in history or those landowners who have succumb to the future impacts of wind and solar developments on neighbouring properties. The sites have not been chosen due soil type or rainfall being inappropriate for agricultural. The developments themselves are not located or designed to maintain the primary agricultural purpose of the land. Solar developments remove all farm improvements, including stock water infrastructure

How has agricultural land been valued in the consideration for the capacity and subsequent development of the REZ? Is this value seen as appropriate to be removed from the state of NSW for the next 30 or so years?

There are many unanswered questions and matters to be considered, accordingly, the application in its current should not be determined. The application should be deferred until such time as the cumulative impacts of more than 40 large scale wind, solar and transmission projects across and adjacent to our REZ are adequately identified and the environmental, social and economic costs are properly understood and compensated. Further, the Central-West Orana REZ Transmission, SSI-48323210 application has not been determined, Birriwa development relies on the transmission lines, so surely this can't be determined until there is certainty over application SSI-48323210.

Thank you for the opportunity to write this submission and for your consideration.

Kind regards,

S Armstrong.