



MARILYN GENDEK

OBJECT

Submission No: 189459

Organisation:	Key issues: <i>Land use compatibility, Visual impacts, Biodiversity, Traffic, Erosion and sediment control, Noise, Waste, Dust, Hazards and risks, Community benefit, Decommissioning and rehabilitation</i>
Location: <i>Australian Capital Territory 2615</i>	
Submitter Type: <i>an individual making a submission on my own behalf</i>	
Attachment: <i>Wallaroo Solar Farm submission_ICPN_31July2024_final.pdf</i>	

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Submission attached

NSW Wallaroo Solar Farm (WSF) development application – SSD 9261283

Objection

I am firmly against the establishment of the NSW solar farm (WSF) which is proposed to be located on the north-west border of the ACT where I live in [REDACTED] the city of Canberra.

The city of Canberra has not been granted the same respect of the 5 km buffer zone for cities that would apply in NSW. In fact, the WSF is right on the fence line of the ACT, bordering Canberra Grasslands nature reserve and the Bicentennial trail.

This is not an objection to renewable energy as a principle.

It is an objection to an ill-conceived project for the area, an industrial sized plant for harvesting and storing solar energy being a 100MW, 182,000 solar panels - the size of 700+ football fields, less than 1km from my home; and the destruction of the rural environment which I overlook daily.

It is an appalling situation that the only real communication I consider we have had was the Public Meeting in Murrumbateman. However, the process from the beginning has been reactive rather than proactive. It was a shock to learn that the WSF has been recommended by NSW planning.

I now am left to justify why this proposal should NOT go ahead, because the large number of objections to the proposal in 2023, including mine, have been ignored by NSW Planning.

Key Issues to Support Objection

1. Level of Communication

The project started in 2019.

“Community consultation on both sides of the border started for the project with community mail outs and two information sessions held in February and May of 5 2021. Two further sessions were also held in July 2022 and another two sessions in June of 2023 to coincide with the public exhibition stage. This was done alongside sponsored posts on social media, website updates and extensive face to face conversations through doorknocking in the Wallaroo area. Consultation continued throughout this period through emails, phone calls and meetings, both online and in person at residents’ homes if requested.” (Cranston Public Meeting 18 July 2024)

If this is true, how is it that residents in West Belconnen in the ACT are still just finding out about the project – through neighbours – not the developers or NSW Planning.

It is interesting to note that the Community Engagement Review Report to the Minister for Climate Change and Energy Survey (December 2003) revealed that landholders and community members were generally dissatisfied with the engagement that they received from project developers. This was over all in the vicinity of 85-92%. And this is a time waster.

Any communication with the residents (the ‘receivers’) on the ACT border regarding the proposed FSW is questionable. According to the NSW Planning guidelines in 2023

“Assessing large-scale solar projects in NSW, the applicant must detail consultation with affected landowners surrounding the development, as well as the local community and council. The EIS must describe how this consultation was carried out, identify any issues raised and, importantly, explain how they have been addressed.”

However, I am aware that there have been offers of ‘incentives’ to some ‘receivers’ to reduce objections to the WSF.

Despite my proximity to the proposed location, I had not received any information or opportunity to engage in public meetings or surveys about the WSF in the planning phase. The development application notice from NSW DPIE dated 22 May 2023 was the first notification received.

This raises a question as to the depth and veracity of consultation in relation to ‘potential amenity impacts to near neighbours’ as mentioned on page 36 of the April 2023 Environmental Impact Statement which have been downplayed.

On page 28 of the EIS, it states that

‘As shown on Figure 2-4 approximately 336 potential receivers occur within 1km of the Development Site, and 4,028 potential receivers within 2km of the Development Site.’

This clearly shows that a 5km buffer zone from the residences in the city of Canberra was never considered.

In addition, according to Appendix E4 only 94 people completed an online survey during the scoping review, hardly a representation of residents in the immediate area.

According to the 2021 census, there were approximately 7,625 people in Dunlop alone.

Both the NSW government and the ACT government have had a role to play in this lack of communication and consultation. Who authorised the developers to communicate with ACT government departments during the scoping review which started in 2019? The project was also raised in the ACT Legislative Assembly in August 2022 but it seems that it was fobbed off.

And it is quite clear that NSW Planning is determined not to listen to objections and to bulldoze ahead to meet their targets for renewable energy projects as per the response of the Director for Energy Assessments (NSW DPH&I) to a closed question referring to proximity of the solar farm to Canberra:

A... To confirm. our assessment would not change, whether that border was there or not. The Department undertook a full assessment... The Department’s assessment would not change. We undertook a full, detailed assessment, regardless of whether that border was there or not...(transcript of Public Meeting, 18 July 2024)

The WSF 2020 Scoping Report documented the following

Where works are outside the easement (and within the ACT) the high risk factors are:

- o **Jarramallee [sic] offset site – for the Lawson development.**
- o **Natural Temperate Grassland and golden sun moth present.**
- o **Aboriginal Cultural Heritage impacts.**
- o Commonwealth EPBC process could be run concurrently and cover cross border issues.
- o **The proposed alignment is either within or close to a future urban area:**
 - Suburban Land Agency joint venture (Riverview group). [Ginninderry]

- EPSDD Impact team recommended consultation with these groups as well as other ACT government agencies.

But NOT residents of Dunlop and MacGregor who were already in an existing urban area. The most recent housing in these areas has existed for over two decades. It was by mere fact that I lived within 1 km of the proposed WSF that I was offered an opportunity to make a submission.

The above dot points are still an issue.

2. Terrain/Landscape

“There are minimal biodiversity and heritage impacts from the project. The site is located on land that is not mapped as biophysical strategic agricultural land, that is, BSAL land, and predominantly on land that has a land and soil capability of Class 4 and 5, which is defined as land restricted to low to moderate impact uses. The land is currently primarily used for grazing. There are no significant visual or noise impacts on residences.” (Director for Energy Assessments at the New South Wales Department of Planning, Housing and Infrastructure. IPCN meeting 10 July 2024)

These statements are underestimated in terms of the ACT.

- The fence line between West Belconnen and the proposed WSF is bordered by Canberra Grasslands nature reserves protecting biodiversity.
- The terrain tells you there will be significant visual or noise impacts on residences in West Belconnen. It doesn't take an 'expert' to know this.
- As for noise, only Ginninderry seems to have been assessed (see letter from Wallaroo Solar Farm Pty Ltd response to NSW Department of Planning, Housing & Infrastructure, 24 June 2004).



Image taken with back to area where the containers of Lithium-Ion batteries will be sited next to Jarramlee Reserve showing elevated residences in Dunlop that are accessed from Hugh McKay Circuit. A number of these have a view of the WSF and the battery storage that is unlikely to be blocked. This street is not mentioned anywhere in the documentation.

I also suggest that in my time living in Dunlop and with a view of the land through using the grasslands for recreation and stress relief, the farmland on which the proposed WSF is to be sited has been left to degrade – very convenient.

The application talks about flat land. What flat land?

The area is undulating and to make it flat, it's not just topsoil that will need to be removed but entire undulations will need to be levelled changing the landscape and potential future use of the land.

The significant habitat disruption from land clearing, construction and maintenance will have a detrimental effect on the biodiversity of the area and the ACT. The WSF will place stress on the local ecosystem and lead to environmental ruin.

The removal of topsoil will create plenty of noise and dust, especially with the prevailing westerly wind that will blow straight into Dunlop and MacGregor in the ACT, and beyond, let alone when 'flattening' the landscape is included. It will take a lot of water - sourced from the ACT – to douse the soil.



This is the border – the fence on the right. This whole area is undulating. The image below is taken from a lower pint.



There has been no consideration for the overall terrain of the area which is a feature of Canberra and its district and climate. <https://www.abc.net.au/news/2024-06-15/act-why-is-canberra-so-cold-how-might-climate-change-affect-it/103815930> The article points to the likelihood of more risk of hail conditions, heatwaves and bushfires in Canberra.

Add to this the amount of ambient heat that will be reflected by the WSF solar panels into the atmosphere which studies have shown will change the local temperature of the surrounding environment and increase drought conditions.

3. Location and Impact on Environment

The planned location of the proposed WSF, is on the border of established ACT populated suburbs of the ACT – particularly West Belconnen - in the **City** of Canberra.

The West Belconnen border of NSW contains wildlife reserves and sanctuaries, recreational and exercise areas, and wide views across the open landscape and beyond which are important for wellbeing and relief for mental health issues.

- How many solar farms in NSW are located less than 1 kilometre from **city** suburban residential properties?
- What are the locations of farms of 100MW or more?
- What consideration was given to significantly reducing the size of the proposed WSF and locating it further away from the ACT residential border?

Within the southern NSW area near Canberra there are examples of solar farms that are distant from the communities – while the same buffer privilege has not been granted to the **City** of Canberra because it is not a city in NSW:

- 8km from Sutton – Springdale SF
- 12km southwest of Gunning – Gunning SF
- 8km from Bungendore – Blind Creek SF
- Goonumbla SF is 10km west from the town of Parkes.

The size of WSF will have a major negative impact on the aesthetics of the area. This has been documented as a main concern for residents and repeated several times at the Public Meeting.

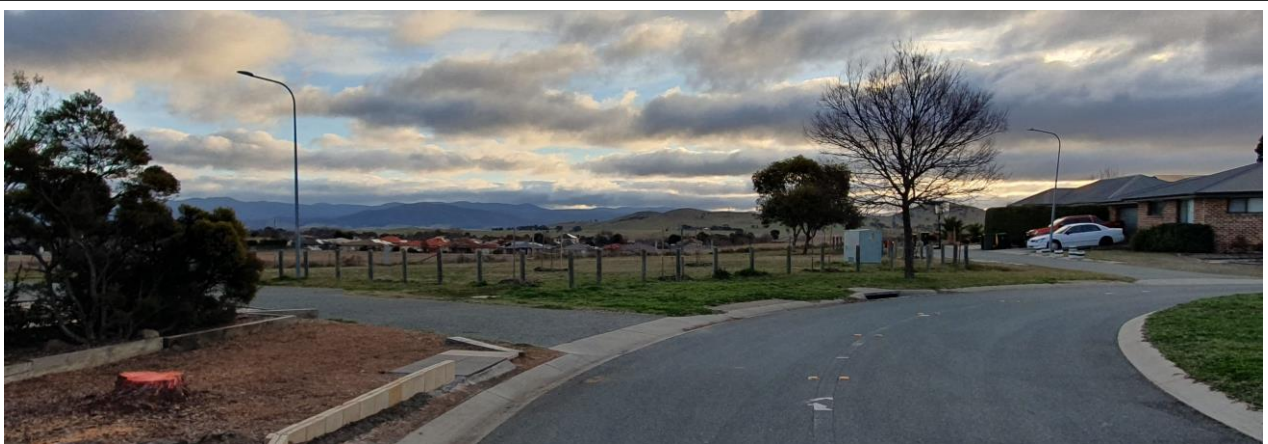
It is obvious that this has not been addressed to the satisfaction of the community affected.

I live on an elevation in Dunlop.

The view in the image is of the WSF area from Douglas Waterhouse Drive, Dunlop. This is an elevated area, and the road is used by residents to access their homes. The elevation on the Dunlop side will look down on solar panels and due to the topography will be also eye level for some.



The WSF solar panels will be seen from many vantage points from Dunlop and Fraser and McGregor. It can be seen driving down Kerrigan Street in Dunlop.



Hanrahan Cres. Dunlop. Houses stretch along the grasslands and look across to an elevation of the proposed WSF over the houses on Henry Sutton Circuit.



Fraser looking towards the WSF. The landowner residence can be seen.



The house out of picture on the right is off Branson Street in Dunlop. Many streets in this area of Dunlop (The Meadows) have views to the WSF.

No amount of 'barriers' will make these suburbs as a whole, or the solar panels, invisible. While the proposal suggests that the main impact will be to those close by, the proposed size of the solar farm is far more far reaching than that.

4. Glint and Glare

As I travel down Douglas Waterhouse Drive and engage with the open rural environment on the ACT Grassland border from an elevation, the prospect of glint and glare is a real problem (see image on p.5). It has been hugely underestimated from the Scoping Report 2020 and onwards.

There is planned to have solar panels which are designed to track the sun from East to West. This will have a significant potential amenity impact for 'neighbours' from any reflection that may occur.

- How many residences are in direct line of vision?
- Will the tracking of these solar panels be extended during the summer months?

I believe this this will create a situation of BLINDING GLARE which I have experienced elsewhere.

Douglas Waterhouse Drive starts at the same elevation as my residence at its beginning and drops down to a bend and looks right across to where the solar panels would be erected.

There are houses along this street which also look to the same view.

According to a topographical map the elevation is commensurate with sections of the planned solar panels.

5. Noise control

Currently the area is a valuable sanctuary of quietness where the wildlife and farm animals can be observed and heard.

The methods cited for noise mitigation in the application are weak and planned for AFTER construction should it be approved.

Construction is expected to take 12-18months. Noise travels in all directions. The proposed WSF is planned to be in a very open space. The very nature of the terrain means that noise from the proposed WSF during construction and after will be heard regardless of any attempt of buffering at lower levels.

As already stated, the suburbs of the ACT in proximity to WSF also have elevated landscapes. It is also an area which is often windy. Noise travelling from the proposed location will be heard through construction and beyond.

This is not acceptable.

6. Fire Risk/Hazard

The proposed WSF has NOT planned to be sited 5km from the boarder/residents of West Belconnen.

This must change.

Within 2km from the proposed WSF are two commercial hubs – Charnwood and Kippax.

The Charnwood hub which is closest to me has:

- 2 primary schools
- 4 early learning/childcare centres
- A shopping centre designed in a U shape with one road in and out
- The West Belconnen Emergency Services Centre.
- Medical practices, pharmacy, and a large veterinarian practice
- 3 churches
- Charnwood District Playing fields
- A service club
- Residential townhouses

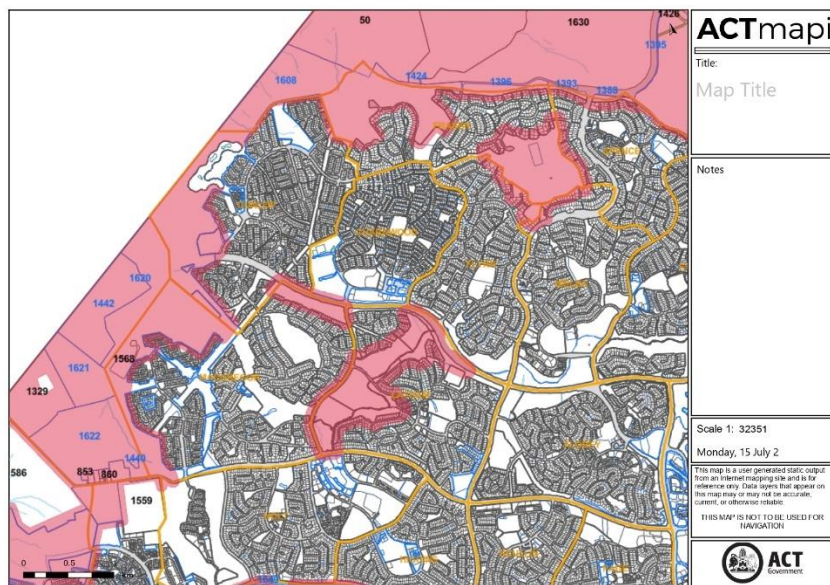
All of these are within meters of each other.

In the same range but not at the Charnwood hub are Fraser and Charnwood-Dunlop primary schools. Fraser Primary school is on the Dunlop Grasslands.

Now think about that because:

- Along the border of NSW the ACT grasslands and other open areas are classified as HIGH FIRE PRONE – map below - and that is without a solar farm on the border.

- The documentation for the project states that the WSF site is classified as BUSHFIRE PRONE.
- However, the project perspective is LOW FIRE RISK based on the proponents stating that they will follow the requirements for managing fire.
- The documentation also states that “BATTERY STORAGE CAN ELEVATE FIRE IGNITION RISKS”
- While maybe safe - until something happens, such as overheating, being damaged, or short-circuiting or manufacturing defects. This could happen in transit.
- However, it is well known that lithium-ion batteries are volatile and when something untoward happens to a lithium-ion battery they don't behave like the typical fire. It is instant AND IT'S HARD TO STOP THE FIRE once it happens,
- This is in direct conflict with the project information which classes fire AS LOW RISK.
- IN ADDITION, THE PREVAILING DIRECTION OF WIND IN THIS AREA IS FROM THE WEST which will fan fire in the direction of West Belconnen.



The battery storage is identified in the documentation as being on the border just inside the entry to the property from the ACT side. This is right next to Jarramlee-West MacGregor Grasslands Nature Reserve on the border of West Belconnen and NSW. It is part of Canberra Nature Park and a stronghold of the Golden Sun Moth and other grassland-dependent species. (Parks ACT)

With fire in the WSF and the battery storage

- the whole area will be at risk of toxic substances entering the grasslands and the waterways.
- The West Belconnen Residents and animals will be subjected to toxic smoke.
- The area has many water courses which feed to in the Murrumbidgee that will be polluted as a result of fire and fire-fighting.



Border - Sign says Road Subject to Flooding. The Gooromon Pond Creek runs into Ginninderra Creek through the Gooromon Grasslands.

In 2003 an out-of-control NSW bushfire which devastated the south-west of Canberra could be seen coming. But fires approaching from WSF will be upon the suburbs of Dunlop and MacGregor within minutes and it will be only 500 - 750 metres from some residences. This is firmly in the minds of affected Canberrans and now it seems our household fire management plans each summer will be a waste of time if the WSF goes ahead.

<https://www.nma.gov.au/defining-moments/resources/canberra-bushfires>

7. Potential Animal Cruelty

It is proposed to run sheep under the solar panels according to the WSF documentation.

But no detail is provided in relation to this apart from some plantings that may take place.

- This area will attract more foxes and other feral animals. How will this be dealt with considering the sheep?
- Is there a guarantee that the sheep won't be breeding ewes with lambs with the risk of lambs being killed by foxes?
- How will the sheep be kept from the toxic substances of the panels or contaminated water - as panels get damaged and leach toxic substances.
- How will sheep be protected from a fire should it occur?
- How will the sheep be protected from getting their fleeces caught in the mechanism of the solar panels?

8. Road and Traffic

Another of my concerns regarding the proposed WSF is the traffic flow and safety at the Barton Highway/Wallaroo Road intersection.

This intersection is within the ACT boundary and has significant implications for safety and Canberra and district tourism, not least of which is the increase in high risk of vehicle accidents and potential fatalities.

To access the planned construction site in Wallaroo, trade and other construction vehicles and large trucks (mainly B-Doubles) will have to use the only main road in and out of Wallaroo. This commences at the Barton highway, and an initial distance is in the ACT.

The Wallaroo Solar Farm, State Significant Development Assessment Report (SSD-9261283) June 2024 states:

Table 11 states - Minor upgrades will take place to the east and southbound turning lanes of the Barton Highway/Wallaroo Road intersection (note these works are located within the ACT and are subject to separate approval).

Minor upgrades will not stop safety risks.

And it seems that the WSF project is being recommended by NSW Planning with no detail on this matter. This is irresponsible.

Additional information states:

Table 8 - The project has the potential to impact local and site roads, primarily during construction. Traffic accessing the site would do so via the Barton Highway.

The heavy vehicle transport route during construction would be coming from Port Botany and would be via Hume Highway, Federal Highway and Barton Highway.

To avoid urban traffic conditions in Canberra it is most likely the over size and over mass (OSOM) vehicles would use an alternative northern access route from the Hume Highway via Yass Valley Way and then the Barton Highway.

The main increase in traffic volumes would occur during the construction period, with the site generating up to **90 vehicle movements a day** during peak construction including **32 Heavy vehicle movements** [predicted to be 18-24months]. In addition, approximately six OSOM vehicles would access the site during construction.

Table 8 - After consulting with Transport Canberra and City Services (TCCS), the Barton Highway and Wallaroo Road intersection would require minor widening to the westbound and southbound turning lanes, with detailed design established in future consultation with TCCS and would be subject to a separate ACT approvals process.

The last statement indicates that consultation with the ACT has been minimal, and it is known that this response was last minute. It provides insight as to poor engagement with the ACT and its residents.

The following statement is also very concerning especially about the safety of all who use the section of Barton Highway and Wallaroo Road intersection and is completely underestimated – as it is only an estimation based on limited information and no consultation with road users.

Table 8 - The Department has consulted with TfNSW, Council and TCCS on the conditions of consent and considers that, subject to the recommended upgrades and conditions of consent, the project would not result in significant impacts to the road network capacity, efficiency or safety.

As a resident of the ACT and user of the Barton Highway, I would like to point out issues which I have identified with this area because of, *inter alia*, Increase in heavy traffic in Canberra, the location of the intersection, visibility, increase of B-Doubles and other construction traffic turning in and out of the intersection daily, high vehicle accident zone, location next to Hall.

I draw these to your attention.

- The construction hours documented are from 7am to 6pm Monday to Friday. These are peak travel times for residents in Canberra and Yass and locations in between. This includes school buses.
- It is also planned that construction will continue from 8am to 1pm on Saturdays impacting on weekend traffic into a Canberra district tourist area.

- There will be significant increase in noise levels from the significant increase in B-Double traffic
- There will be more road-kill. Currently the dead wombat population on the Hune Highway is appalling. Trucks take no prisoners.

It is likely vehicle accidents and fatalities will increase. This has been a Barton Highway trend. There are no emergency services in this area unless the RFS provides first response. Priority will be Emergency vehicles from Gungahlin.

It should be noted that the construction period is not the only time large vehicles will need to access Wallaroo Road and the Barton Highway. There will be this type of traffic when repairs are to be made and panels replaced. So, it will be a continual problem.

Lastly, what is not mentioned is that access to the site proposed for the WSF has the potential to be gained from the ACT side. How will trades and trucks be stopped from taking short cuts using back routes?

9. Waste from the Solar Farm

Long term disposal of solar panels and other material used in the production of renewable energy is rarely discussed. It is well known that the products used to make solar panels and lithium batteries are dug out of the earth and are toxic (and these minerals and rocks are NOT renewed by mother earth).

It is without a doubt that all the proposed WSF solar panels WILL NOT SURVIVE 30 YEARS. Due to general degradation, malfunction, and environmental damage such as hailstorms, and fire they will need to be replaced continuously.

How do the proponents plan to dispose of the discarded and damaged materials?

10. Property value and Insurance Premium

It is quite clear that the probability of significant depreciation of the value of my property in Dunlop will be impacted. This has been estimated at least 20-30% by respected local real estate agents.

I am already subject to a 100% increase in insurance premium over two years because the insurance company's AI thinks I am in some sort of zone of risk for whatever reason it cannot explain. If the project goes ahead, I will be in a significant zone of risk and subject to insurance companies deciding I am at an even higher risk because they can now add high probability of fire coming from the west.

11. Finally

The process of consultation has been extremely limited. And engagement with all residents that will be affected by the WSF proposal has been avoided.

NSW Planning have recommended a proposal that is flawed and lacking detail and has been complicit in ignoring ACT residents and a 5km buffer because the residents are not in NSW.

The Wallaroo site is not the right place to erect 182,000 solar panels especially only 500 metres from the suburbs of a major city - Canberra.

The WSF proposal should not be approved by the NSW Independent Planning Commission.

Thank you



City of Canberra