

I'm writing this submission to express my strong objection to this proposed development, Richmond valley Solar Farm Application Number SSD-41020244 located at Ellangowan/Myrtle Creek NSW 2470

As a resident in the immediate locality of this large-scale solar project I am concerned about the significant threat this industrial scale development will pose on our irreplaceable natural environment that is currently under regeneration from the 2019 bushfires and the 2022 flooding events that occurred during these years.

After reading the EIS attached to this project and discussing the development with Ark Energy's project managers and general manager, I have great concerns that some of the mitigation/management procedures regarding bushfire, flood, and environmental impacts are being excessively under considered and further impacts associated with this development being overlooked completely, with inconsistent information throughout the reports and information received through conversations from Ark representatives.

It is evident that this land is not suitable for this kind of Large-Scale Solar Development.

My concerns are as follows

Land/soil:

In the Soil and Agricultural Impact Assessment it indicates that the laboratory testing results show that there is moderate to high potential risk for dispersion and erosion across the entire development footprint where soil impacts occur and that the land cannot withstand high impact works. Figure 11 of this assessment also shows a very large portion of the development footprint to have **very severe limitations** of soil capabilities.

The construction process alone of this solar project would cause significant damage to the soils, and mitigation practises proposed are inadequate or voided because of the amount of works that will commence. The Soil and Agricultural Impact Assessment in the section **5.3.1 SOILS** it states that over the majority of the Development Footprint soils will be subject to only **minor** disturbance as part of the construction of solar arrays and electrical cable. I find this to be **misleading information** as there will be, at this stage an unknown large number of kilometres of 1mx1m dug out, underground trenches. I believe this number of kilometres to be quite significant and no where in the reports states this. Would this not be classified as extensive and **high** impact which should not be the case on these types of soils which have very severe limitations?

There is also no mention as such of the construction of the 52kms of compacted internal roads which would be considered moderate to high impact as that is a substantial amount of soil disturbance also to which is being classified as only minor.

Moreover, there is no mention about the impacts 500,000+ steel posts being pole driven 1.6-1.8m into the soil, with the potential need for drilling and concrete if rock is located in spots.

Again, wouldn't this be classified as **high** impact on soils with very severe limitations? To say this is only minor seems very **misleading**.

There is little to no mention about the 118 invertors that will require hard or compacted pads that will be scattered throughout the footprint, again, on land that has very severe limitations. More assessment should be done regarding how this type of infrastructure will go on flood prone land and what issues and impacts will they cause. Will they be built up hindering water flow on flood prone land?

These few points alone have only been mitigated as minor impact, leading to the potential for serious and irreversible impacts that have been overlooked.

Bushfire:

Once again there has been inconsistencies with information regarding bushfire. In one section of the report, it states vegetation will be kept at a minimum using herbicidal controls for bushfire prevention mitigation, then in another section explains the options of Agri solar for livestock will be explored which will call for the need of vegetation, deeming the former bushfire mitigation void and the risk of fires starting/spreading higher. Will there be further reports/assessments done at this stage before approvals to mitigate bushfire properly if agrisolar will be pursued?

This farm currently serves as a buffer that can be utilized by emergency services to prevent the spread of fire in the event of a bushfire coming from the surrounding state forests. The proposed solar farm and its security fencing will obstruct the clear land that could be used for firefighting efforts. Therefore, further investigations about suitability of this land for a solar development should occur.

Fencing:

Upon reviewing the report, I have found multiple instances where it is explained that the 2.1m high chain link fencing will have no visual impact, I believe this to be highly **inaccurate**. While I understand that the fence is legally required, claiming it has no visual impact on the landscape and the community that must see it is very untrue, giving a false imagine to the impact it will cause. This is not a small fence; this fencing will extend for hundreds of kilometres significantly affecting the visual landscape.

Furthermore, this fencing will

- restrict fauna movements
- decrease water flow over flood prone land, creating a blocking effect for water to drain away freely
- changing the course of water flow, leading to hazardous conditions in the event of evacuations and for further downstream indirect impacts to Physics Creek and associated wetlands

- hinder evacuation efforts for livestock, wildlife and people during a bushfire
- reducing land that can be easily accessed to stop bushfire in the event that fire is spreading from Ellangowan State Forest and Bungawalbin State Forest or vice versa
- trapping wildlife during a bushfire preventing them from accessing safe areas
- habitat fragmentation, the 30m biodiversity corridor that is part of the mitigation to solve this seems inadequate. This corridor will not have sufficient effect till possibly 8-10 years. What mitigation is being done in the meantime to stop the fauna from dispersing from the area rendering it potentially sterile?

Thorough consideration of the fencing alone should be taken into account when approving the development, additional reasons why this site is not suitable of a large-scale solar project.

Solar panels:

once operational the 730,000 panels will:

- cause permanent shading over a vast area resulting in disruption to natural light, compromising the ecological balance. To which offset credits for the entire area needs to be assessed, even though the area has been historically disturbed this land still holds valuable ecology
- disrupt and negatively impact the areas sense of space and aesthetic. The interrupted visual would damage the innate beauty and simplicity that currently occurs in our prominently nature-based region. Contrary to the reports stating that the panels and infrastructure will have no visual impact I can assure you this is not the case, and the community will strongly disagree. To say the solar project will have the same appearance to that of the surrounding dwellings is completely **misleading and inaccurate** and further investigations needs to be done for these statements.
- Reduce the areas appeal to community, visitors and new residents, hindering the region's ability to grow

Our farm that we have lived on for 30+years will look down over this project. For years our family has enjoyed many mornings or afternoons sitting on our verandah overlooking our beautiful unspoilt view which we take great relief in, it will now be a sea of steel and infrastructure, incredibly altering our sense of space.

The assessment grid in appendix C of the landscape and visual assessment -photomontage 06 which is our family home gives a false representation of the impact that will occur. The photomontage grid is not over the 'prosed 60-degree crop version' in which is closer to that of a human eye experience, in turn the montage needed for the visual report shows a very distorted representation of a human eye view and this should not be relied on as accurate information when approvals are being done. The downsizing of this large-scale solar farm should be considered

Social Economics:

- As it stands today, it takes hours in emergency rooms, weeks to see a GP and months to see specialist. These time frames will grow when our region is in flux by several hundreds (even more cumulative with multiple projects in varying stages of development). This needs further investigations before decision are made
- Accommodation, although covered in the reports, has consideration gone into our yearly events such as primex, beef week, jacaranda festival etc that draw very large crowds to our area that also need accommodation at the time of construction?

Biodiversity/habitat:

- More consideration needs to be had regarding the wetland area to the southeast of the project around the location of physics creek. This area needs to be completely avoided of all panels. Not only does this land have very severe limitations but also holds greater ecological importance
- All hollow bearing trees should be kept as they hold valuable importance to habitat and will continue to do so in the future, especially for the Little Bent Winged Bat (*Miniopterus Australis*) which has been recorded within the subject land
- There should be greater buffers around existing vegetation and added vegetation corridors connecting internal sections as habitat connectivity is critical for maintaining healthy populations as it promotes biological diversity through the exchange of genes
- The large area that will be flat cleared for the transmission lines that is home to Threatened Ecological Communities, should remain as it stands as it is valuable habitat for future biodiversity of our area
- Non-native vegetation land should still be assessed for threatened species
- Category 2 regulated land should not be getting flat cleared for transmission lines and should be avoided
- A retake of PCT photographs should be undertaken in the year to come prior to construction commencing to get an updated view after another few years of bush regeneration and impact assessments be redone

Other factors:

- Larger buffers around site RVSF-UMW-01 where aboriginal artifact was found in the case more could be located
- The cost of this \$1.2 billion project will further drive up the cost of power in a cost-of-living crisis
- Taking up valuable land that could be used to produce food, crops or plantation to maintain future sustainability in the broader regions. Utilising already built structures to house solar panels would be a much more efficient use of space e.g. buildings and car parks and existing house roofs

- This large-scale project is located within a very short distance of E2 Environmental Conservation land (High Conservation Value Old Growth Forest- 11487) this area should not be industrialised by multiple developments of this scale and purpose
- Heat Island Effect- this has not been covered in any assessment. The area around this project and cumulatively around projects in the area needs to be assessed further for the impacts of Heat Island Effect
- There has been no photomontages done of the BESS and substations to assess the impacts of these structures on their surroundings e.g. residential dwellings and road users, it was stated this infrastructure was of low impact on the community but the large scale size would suggest otherwise. Assessments need to be done
- The top of Ermelo Road needs to be assessed as a viewpoint. Places far beyond view of the project were assessed, but other public viewpoints that have a very clear view have been completely missed
- The noise monitoring unit placements need to be investigated and we request noise monitoring at our residence

This project has caused large amounts of personal mental health challenges that has affected my work, my studies and my ability to be present for my young family. It has caused uncertainty and conflicts within my family, siblings and community. We have owned our farm for 30+ years, now we have to determine whether this new industrialisation on our area aligns with our future, we feel cheated that our sense of space and our connection to land and country will be drastically altered.

As it states in the guidelines 'the likely impacts of a Large-Scale Solar Development can only be determined by **understanding** the sensitivity of an area or view to change and the magnitude of the project in that area or view', with on reading that, I believe a public hearing should be held due the downplaying of impacts and inaccurate information being given. The community should have a proper chance to state how special our area is and how much impact this project will have on our area, community and land.

Thank you

