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[Middlebrook Solar Farm | Planning Portal - Department of Planning and Environment \(nsw.gov.au\)](http://www.planningportal.nsw.gov.au/major-projects)  
From: saveoursurroundings@outlook.com

Dear Contact Planner, Megan Ramsdale  
**SOS objects to SSD-10455 320MW PV Solar and 300MW/600MWh ESS Works**

**Project summary**

Applicant: Middlebrook Solar Farm Pty Ltd as trustee for Middlebrook Solar Farm Project Trust  
Project: a 320MWac PV solar works with a 300MW/600MWh BESS, 700,000 solar panels  
Site location: 22km South of Tamworth NSW  
Site area: Development footprint 530ha of the total hectares land leased.

Save Our Surroundings (SOS) objects to the proposed Middlebrook PV Solar Works (see separate submission for BESS concerns) for the following reasons:

1. The 320MW project in fact will only intermittently produce less than the annual equivalent output of a modern 95MW base-load 24/7 power plant, of which hundreds are being built around the world. **What is the estimated capacity factor for this project? Where will electricity come from for the other 70% - 100% of the time? What extra costs are involved that will be passed onto the consumers and/or taxpayers?**
2. The stated life of 30 years is unsubstantiated and is in conflict with several other proponents of similar projects, one of which admitted in a Panel Hearing that the project life was 25 years not 50 years as claimed. **What basis is there for the Proponent make such a highly exaggerated claim? Is it to inflate the benefits so as to "sell" the project to the communities?**
3. Electricity costs to Australian consumers have risen sharply (at least 60% this quarter alone, and more than 500% over 4 years, even with rooftop solar) as the percentage of industrial solar and wind electricity generation has increased to over 30% of the NEM generation mix. Already, Australia is now in the top most expensive retail costs of electricity. No country in the world has reduced electricity cost once wind and solar reach such levels. **Why does the Proponent fly in the face of reality by claiming their project will deliver affordable and sustainable renewable energy to businesses and communities within NSW? How can the project be sustainable when it requires so much more mining of minerals and land than any base-load power plant?**
4. The embedded greenhouse gases in this project will take up to a decade or more to offset. Such gases are created upfront in producing, transporting and constructing the project's components and stay in the atmosphere for 100 years or more. If CO2 emissions for the whole of Australia were reduced to zero it would make no measurable difference to global temperatures and therefore the climate. **What will**

be the embedded GHG emissions created for this project? What is the point of claim that the project will contribute to the reduction of greenhouse gases if it is of no consequence?

5. The Proponent claims that its project will minimise environmental and heritage impacts. Yet its own statements say the opposite. That is, it admits it will destroy many hectares of critically endangered habitat which support not just endangered flora and fauna but many of the other wildlife species that require the area for their existence. Every proposed project within 100kms of the project site say the same, but the bottom line is a reduction in wildlife habitat and the reduction or total loss of some wildlife across the region. **Why should our surroundings be denuded of its existing wildlife when much less damaging alternative to electricity generation exist?**
6. The Proponent claims that its project will boost local employment and economic benefits. It spreads some of these "benefits" over an unrealistic project life of 30 years. It is estimated that only 15% of the \$856 million dollar cost of the project is Australian content. After 21 to 30 months of construction the ongoing employment is miniscule compared to modern low/zero emissions 24/7 base-load power plants. The Proponent fails to highlight the massive benefits it will receive from taxpayers and consumers. Just the RET subsidies of a minimum of \$40/MWh sent to the grid will yield tens of millions of dollars a year. Together with the \$727.6 million in imported components these amounts go overseas. **How does the Proponent justify the return of such paltry amounts to the local communities and electricity consumers of their own money?**

SOS could raise many more issues with this project, such as potentially breaching our modern slavery laws, industry viability, cumulative impacts, increased fire risks, contamination risks to soil and water, taking away resources from regional residents, to and unfunded decommissioning/Rehabilitation costs, name a few. The Proponent says very little about the BESS, yet our governments tell us this is how the intermittency and unreliability issues with wind and solar generation will be overcome (70% plus of the time!).

However, our points 1 to 6 above, which we require be individually responded to, show that the Proponent's stated objectives for the project cannot be met. Therefore, the project should not be approved.

Regards

Save Our Surroundings