

**The Director – Energy Assessments  
Development Assessment  
Department of Planning and Environment  
Locked Bag 5022  
Parramatta  
NSW 2124**

Submission uploaded to: <https://majorprojects.planningportal.nsw.gov.au/>

**18 September 2023**

**Attention: Mr Jai Reid**

**Objection to Muswellbrook Solar Project – SSD-45643209**

Dear Mr Reid,

The continuing destruction of the Australian countryside is unacceptable to Australian citizens who support farmers, graziers and regional Australians in their campaign against the irrational development of wind projects and solar projects, which are environmentally destructive.

When determining any planning application, primary consideration should be given to the principles of ecologically sustainable development as stated in:

**Federal Legislation - Environment Protection and Biodiversity Conservation Act 1999**

**3A Principles of ecologically sustainable development**

The following principles are *principles of ecologically sustainable development*:

- (a) decision-making processes should effectively integrate both long-term and short-term economic, environmental, social and equitable considerations;
- (b) if there are threats of serious or irreversible environmental damage, lack of full scientific certainty should not be used as a reason for postponing measures to prevent environmental degradation;
- (c) the principle of inter-generational equity—that the present generation should ensure that the health, diversity and productivity of the environment is maintained or enhanced for the benefit of future generations;
- (d) the conservation of biological diversity and ecological integrity should be a fundamental consideration in decision-making;

Considering each of the aforementioned principles, as they relate to Smokey Creek Solar Power Station:

**3A (a) decision-making processes should effectively integrate both long-term and short-term economic, environmental, social and equitable considerations**

Solar projects are considered to be short term installations and the push for nuclear energy in Australia and the rest of the world to provide reliable, sustainable, affordable energy while not emitting carbon dioxide will, in my opinion, see this project, if approved, become a stranded asset.

When considering environmental issues there is a dark side to renewable energy. Much emphasis is placed on the worldwide production of carbon dioxide by the burning of fossil fuels. What isn't

discussed is the life cycle of PV solar panels which includes the sourcing and mining of raw materials to enable the manufacture of PV solar panels and their associated infrastructure.

Social impacts include, what is increasingly being reported as the use of forced labour by some manufacturers in the production of PV solar panels. ABC News <https://www.abc.net.au/news/2023-05-24/forrest-group-walk-free-warns-slavery-threat-solar-panels/102383470>

**3A (b) if there are threats of serious or irreversible environmental damage, lack of full scientific certainty should not be used as a reason for postponing measures to prevent environmental degradation**

Again, there are threats of serious and irreversible environmental damage associated with the manufacture, installation and decommissioning of PV solar panels.

PV solar panels are not recyclable and are currently buried. Toxic elements in the panels then leak into the water table and poison the groundwater. Currently there is no effective waste management plan for the decommissioning of PV solar panels. The soil below the panels is rendered useless for future agricultural use. (UTS 2019 Report)

Mining leases are required to provide bonds for the rehabilitation of mined areas at the completion of mining operations. No such rehabilitation bonds are currently required for solar projects which has resulted in many abandoned solar projects overseas being left as ghost structures dotting the landscape.

**3A (c) the principle of inter-generational equity—that the present generation should ensure that the health, diversity and productivity of the environment is maintained or enhanced for the benefit of future generations;**

Rural lands, developed for solar projects, have been used for agricultural production for well over 100 years. Managed properly they could continue to be used for agricultural production for centuries to come. Solar projects are short-term installations and will not provide meaningful jobs for the local community during their short lifetime as opposed to ongoing employment for locals if the land is continued to be available for agricultural and grazing production.

Australian agriculture accounts for 0.55% of land use (427 million hectares, excluding timber production in December 2020). It is short sighted and short term to continue to reduce available agricultural and grazing land by building solar projects.

There is an ancient Indian saying:

“We do not inherit the earth from our ancestors, we borrow it from our children”

Intergenerational equity must be considered.

**3A (d) the conservation of biological diversity and ecological integrity should be a fundamental consideration in decision-making;**

The conservation of biological diversity and ecological integrity should not only be considered in relation to the local areas. The life cycle of solar projects should always be considered in relation to ecologically sustainable development elsewhere.

Adjoining landowners downhill from solar projects have suffered significant loss because of the uncontrolled rainwater runoff from the denuded land under the PV solar panels. (See attached

**Objection to SSD-46543209 – Muswellbrook Solar Project**

photos). The landowner of the property upon which the proposed solar power station is to be built should be made aware of the tort liability of nuisance and the law regarding negligence.

It is ridiculous that Australia is currently not effectively using its abundant coal, gas and uranium resources to provide an affordable, sustainable and reliable energy generation network for its citizens and businesses.

In conclusion, the Federal Government needs to legislate to remove the prohibition on nuclear energy, which is required to meet Australia's national security needs and not rely on supply chains that are becoming more tenuous.

Yours faithfully,

*Bill Stinson*

**National Rational Energy Network**