

Summerville Solar Farm  
Application No SSD-46982232 Location 7605 Summerland Way, Rappville

12<sup>TH</sup> December 2023

Department of Planning and Environment

Dear Sir/Madam



Independent Planning Commission Description of proposal Development of a 90 MW solar farm and associated infrastructure, including battery storage and grid connection.

Our organisation is very concerned about the rapid roll-outs of 'renewable energy' industrial proposals in Australia. Our organisation's charter is to protect biodiversity. This proposal is a large scale industrial proposal that will have a major impact on the vegetation, flora and fauna. This is an entirely different change of land use that the proponent classifies as a 'farm'.

Our main concern is biodiversity loss that this industrial change of land use that will occur from land clearing for this major infrastructure.

The proponent states that up to 124.33 ha of native vegetation is expected to be cleared, of which 78.8ha will require offsetting. Offsetting is inadequate, and EIS statements continue to underplay the true cumulative affects of these developments that will fail the environment and the community.

We have some serious concerns and objections listed below:

1. Compromises scenic character of the land: the development of a solar farm on the proposed site directly conflicts with the local and state planning policy provisions that encourage the "rural and scenic character of the land" to be maintained
2. Insufficient mitigation measures: the *State Environmental Planning Policy (Transport and Infrastructure)* imposes requirements on the consent authority to consider mitigation measures. The potential mitigation measures suggested by the Proponent have been profoundly insufficient to achieve development approval
3. Lack of consultation: Consultation is not consent, and the process to inform the public is inadequate.
4. Impacts on biodiversity and primary production electricity generation and battery industry facility in the midst of traditional farming properties will have an adverse impact on the adjoining properties, potentially requiring changes to farming practices as risk is transferred to those adjoining properties, through the heat island effect,
5. Impact of fire risk and insurance risks: if the solar farm does not implement fire prevention and fighting measures which ensure that fire cannot spread either from the facility to adjoining properties or from adjoining property, damaging the facility, the implications of costs and loss and difficulty in obtaining appropriate public liability insurance for a reasonable premium are unreasonably imposed on the neighbours. Setbacks should be a minimum 30metres with a further 300 asset protection zone on the site and neighbours should be

indemnified and/or compensated for fire escape from the solar farm, and for loss of farm income.

6. Underground water concerns the earthworks and potential removal of vegetation may affect watercourses and vegetation on the property increase the risk of run-offs adversely affecting adjoining properties particularly given the significant run-off due to the physical concentration of the panels and the diversion of water away from existing drainage to the layout of the solar panels and parks and roadways.
7. Social License: there is an enormous amount of uncertainty associated with the proposal and its potential impacts of industrialisation of the landscape, the change of character of the area. It is an entirely different change of land-use from beautiful scenic rural vegetation to an industrial large scale site. There is no social license that destroys our environment, our visual amenity, whereby the only beneficiaries are the financial vested interests. Neighbouring property owners, tourism and agriculture may well suffer for years to come. Of concern is the health and mental well-being of the community that may be seriously impacted for an unnecessary industry that does not provide dense baseload energy.

Yours sincerely,

Carolyn Emms  
President  
Rainforest Reserves Australia