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We wish to object to the Sandy Creek Solar project SSD- 41287735

**1. Class 3 and BSAL land.** The EIS states the majority of the land (957ha of 1713ha) is classified as LSC Class 3 plus an unidentified quantity that is biophysical strategic agricultural land (BSAL). Class 3 land and BSAL is valuable cropping land that will be taken out of agricultural production for up to 40 years (if the stated life of the project is correct) and is likely never to be used for cropping again, particularly considering the decommissioning plan only includes removal of ABOVE GROUND infrastructure.

**2. Decommissioning.** The statement by the proponent that they may leave the underground cabling in-situ 'to prevent ground disturbance' (depending on landowner agreement) is insufficient. If the project proceeds, we demand that the decommissioning plan INCLUDE removal of ALL underground cabling, concrete, posts etc. to be able to fully utilise the land for cropping in the future.

The proponent will rip the land to place the cabling, so a further ripping will surely not be an impost. After 40 years of not being farmed, and having no deep-rooted crops, trees etc., on the site, the land will likely be severely compacted and therefore digging up the cabling may assist the soil to become productive again, post project.

Cropping land is regularly 'disturbed' as part of the process of growing crops (eg. ripping, ploughing) so this is not a sufficient reason to leave the cabling in-situ.

Amendments need to be made to the decommissioning plan and a decommissioning bond be established to ensure that decommissioning will in fact take place, regardless of who owns the project at its end of life.

**3. Sheep Grazing**. The proponent suggest that sheep grazing will be undertaken during the operation of the project, preferred as a solution to stopping all agricultural production on the site. The grazing of sheep on the project site is not realistic for the following reasons:

1. The trial for grazing sheep under solar panels was only a small trial in Parkes for the Parkes Show. In this trial, unprotected universal joints on the panel rotation mechanism caught some sheep. Some sheep died and some were skinned alive. The response was to only run sheep with 6 months wool (which is limiting to the point of

useless). The trial area did not have any infrastructure such as yards or water troughs, causing sheep to lick the water/dew off the solar panels. This trial is not sufficient to base the option to graze sheep on the site.

- 2. There will be restrictions on vehicles that can be used for mustering and assistance by work dogs will be generally prohibited. How can sheep then be mustered?
- 3. Sheep will only be able to be mustered in the middle of the day when panels are horizontal. In hot weather it is poor animal husbandry to move sheep in the middle of the day.
- 4. There are instances where immediate attention is required eg. fly strike. With restrictions on access/times care for the sheep will therefore be difficult to impossible.
- 5. Will fencing, yards and water troughs be in place and maintained? Gundary Solar and Birriwa Solar also state sheep grazing can be undertaken yet there is no provision for fencing, yards or water troughs.
- 6. Wellington has significant country covered by solar panels however there are no sheep in evidence in any of the solar projects.

**4. Vegetation planting as mitigation**. Vegetation planting is insufficient for visual mitigation however is the mitigation of choice by multiple proponents.

Proponents prefer to establish the vegetation screens with seedlings/tubestock when the project is operational. However, trees and shrubs can take many years to establish and grow and need constant care in the first few years.

If the project proceeds, vegetation screening plantings need to be undertaken during the construction period, with established trees/shrubs of at least 2 years growth, with a watering and care schedule undertaken by the proponent until the trees/shrubs are at mitigation height. The proponent should continue to be responsible should there be any loss in the trees/shrubs in the vegetation screening and need to replace the lost tree/shrub with a similar sized tree/shrub.

**5. Watercourses.** The EIS states there are multiple watercourses traversing the project site. What precautions are in place to stop any toxic runoff into the watercourses should there be a fire or hail damaging the solar panels?

**6. Water use.** The proponent estimates 70ML of non-potable water will be used during construction (approx. 2 years), mostly for dust suppression, site amenities, fire protection and washing of construction equipment and plant, which will be sourced via multiple groundwater bores.

In a situation of a low-rain period, surrounding farms and towns which depend on bore water have experienced a drop in the water table. Drawing down the proponents 'worst

case scenario' of 150ML/year will put too much strain on the water table for domestic and livestock uses in the wider district.

Dust suppression and washing of construction equipment and plant is a waste of water. We have had to live with drought and minimal water and appreciate its value. The proponent obviously never has and is not showing consideration for the community by such excessive water use.

**7. Social Impact Assessment**. The social impact assessment is grossly inadequate. The proponent's consultant has done a sterling job of copying and pasting figures regarding the district, yet the actual interaction with the community has been verging on nil. The SIA goes into quite a lot of detail, however out of the local study area population of 1334 people (proponent's figures) they interviewed:

- 1. only four (4) landowners once (February 2023)
- 2. First Nations stakeholders once (February 2023)
- 3. Dubbo Regional Council once (February 2023)
- 4. Dubbo Chamber of Commerce once by phone (March 2023)
- Dunedoo Show table once (February 2023) NO NUMBERS are recorded for engagement. We witnessed the Dunedoo Show table and it is likely that this was likely in the range of under five (5) people.

6. Online Survey (Dec 22- March 23) – NO NUMBERS are recorded for engagement Dunedoo stakeholders appear to have been ignored. Dunedoo as the nearest town, has a District Development Group, the CWA and the Dunedoo Lions Club and the proponent should have contacted them.

Overall the SIA has been based on potentially under 20 people. Hardly a sufficient percentage of the local district's population.

More community consultation should have been pursued by the proponent with at least letterbox drops to the wider community advising them of the plan to establish a solar project and multiple presentation/Q&A sessions for the community held in the district. This shows a lack of respect for the local communities by the proponent.

We request the SIA be repeated with increased consultation and the findings considered with amendments to the project.

**8. Temporary Workers Camp**. The proponent has proposed a temporary workers camp for 350 persons. With the number of projects that are currently planned in the CWO REZ with multiple worker's camps, the district will be unrecognisable with mini satellite towns (accommodation camps) at every turn. We reject this option of yet ANOTHER temporary worker's camp.

**9. Cumulative Impact**. The proponent admits that there are five (5) proposed projects within 3km of this project, another eight (8) projects within 30km, another twenty-six (26) within 31-90km and another ten (10) within 100km of this site. This means FIFTY (50) proposed projects within 100km of this site within the CWO REZ.

Table 3.3 of the SIA identifies a peak workforce of 3470 temporary workers during the construction phase for this and nearby projects (within 3km). This poses an unacceptable impact on residents.

The proponent also admits the visual landscape character of the area will change from predominately rural agriculture to 'renewable energy infrastructure' i.e. INDUSTRIAL. The residents of the CWO REZ were never asked by the Minister, the local political representative or the Council if they would be happy to see their beloved homes, farms and businesses have their visual amenity destroyed by this industrial infrastructure and a consequential loss of property value.

The cumulative impact is too high a price for the residents and communities to bear.

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