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TAMWORTH BESS EIS Submission 24th June 2024

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Project: Tamworth BESS, SSD-23830229

Director – Energy Assessments
Development Assessment
Department of Planning and Environment

OBJECTION SUBMISSION

ATT: Pragya Mathema (Planner), Director – Energy Assessments, Minister for Planning & Public Spaces

Please accept this letter as my objection to the Tamworth BESS, SSD-23830229

My objection to this project is based on my deep concern and lack of confidence in relation to any potential benefits of Industrial Renewable Energy vs the disastrous Rapid Renewable Transition across rural & regional NSW/Australia

VALUES & PRIORITIES

My involvement in agriculture, love of nature and experience in rural community development and rural town revitalisation has provided me with a background that **values and prioritises** the following:

- Rural and Regional Communities, their people, their contribution, and their character
- Our people – individual physical and mental health, and capacity
- Our environmental assets, including bushland and biodiversity
- Our precious soil and water resources
- Australian agriculture - food & fibre production
- Unique interconnectedness and interdependence of the land, water, flora and fauna, rural people and rural communities
- Our cultural, Aboriginal and historical heritage and assets
- Responsible, equitable and fit-for-purpose developments that empower and enable rural communities
- Intergenerational equity
- Unbiased scrutiny of feasibility and cost-benefit-analysis
- Attitude of critical thinking and common sense

SIGNIFICANT CONCERNS

The **project impacts** (cumulative and residual) that are of **significant concern** to me are:

- Combined project impacts (Visual, noise, social and economical) on one location/community

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- Lack of clear combined project impact assessments and ongoing monitoring – particularly visual amenity, noise and environmental
- Cumulative impacts – all local, regional and state cumulative impacts
- Social impacts, loss of community cohesion and character, lack of clear demonstrated community support and acceptance (no social license)
- Environmental impacts, loss of native grassland, woodland and flora and fauna
- Agricultural and Property Impacts, loss of productive Agricultural land, cumulative decline in food and fibre production
- Noise impacts
- Water
- Loss of property rights
- Decline in rural property values
- Unavoidable impacts to nearby residents
- Health and environmental hazards – transparent consideration
- Loss of natural landscapes to industrialised developments, inc energy generation and transmission
- Workforce, competition with existing industries for employees, TWAs, temporary population growth, traffic, noise, dust and anti-social behaviour
- Decommissioning processes and certainty, and recycling ability of project infrastructure
- Rushed and unbalanced Energy Transition – ineffective state-wide **coordination** i.e silo'd approach to project assessment and approvals
- No reliable base-load power source identified in transition
- Capability of local communities and LGA to cope with the numerous impacts and demands of State Significant Development/s

The cumulative and residual Social, Environmental and Economical impacts are simply TOO great. They are a cost we should not force future generations to bear. It is our generational responsibility to act in a considered and balanced way in regard to all developments with such substantial cumulative and residual losses and costs. This Renewable Energy transition is not about saving our environment and securing the future of Australia, if it was, we would be spending the time needed to get it “right”.

I wholeheartedly believe that landowners and rural communities should have the right to reject developments which they consider unsuitable, risky or damaging. This is their home, livelihoods and businesses, family history, potentially generations of irreplaceable livestock genetic development – the chance of having both home and livelihood significantly and negatively impacted simultaneously is less likely when you live in urban areas, but is common occurrence when these developments impact rural and agricultural areas. Powering the nation is undoubtedly important and vital for the future of our country, but not at the cost of one group of people – rural landholders. This should be a balanced transition that demands a fair and equitable delivery of a diverse range of sustainable energy generation and storage solutions.

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Just as important, landowners and rural communities should be actively invited to participate in project acceptance, planning, impact mitigation and be actively involved, collaborated and empowered throughout the engagement process. It is not merely an act to inform and consult. As we know better, we should do better. A sound and effective international Quality Assurance Standard for Community & Stakeholder Engagement is the International Association for Public Participation (IAP2) 2015. This isn't new, there should be no reason why best practice community engagement is not occurring. The level of local objection submissions received to this project would evidence this.

IAP2 Spectrum of Public Participation



IAP2's Spectrum of Public Participation was designed to assist with the selection of the level of participation that defines the public's role in any public participation process. The Spectrum is used internationally, and it is found in public participation plans around the world.

INCREASING IMPACT ON THE DECISION					
	INFORM	CONSULT	INVOLVE	COLLABORATE	EMPOWER
PUBLIC PARTICIPATION GOAL	To provide the public with balanced and objective information to assist them in understanding the problem, alternatives, opportunities and/or solutions.	To obtain public feedback on analysis, alternatives and/or decisions.	To work directly with the public throughout the process to ensure that public concerns and aspirations are consistently understood and considered.	To partner with the public in each aspect of the decision including the development of alternatives and the identification of the preferred solution.	To place final decision making in the hands of the public.
PROMISE TO THE PUBLIC	We will keep you informed.	We will keep you informed, listen to and acknowledge concerns and aspirations, and provide feedback on how public input influenced the decision.	We will work with you to ensure that your concerns and aspirations are directly reflected in the alternatives developed and provide feedback on how public input influenced the decision.	We will look to you for advice and innovation in formulating solutions and incorporate your advice and recommendations into the decisions to the maximum extent possible.	We will implement what you decide.

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Environmental Planning and Assessment Act 1979 (EP&A Act), Division 2.6 Community Participation

Project: Tamworth BESS, SSD-23830229 IS NOT IN ACCORDANCE WITH EP&A Act, Division 2.6

As an individual and as a farming family, we have embraced renewable energy and utilise it to power our home and farm. 10 years ago, I personally could only see the many benefits of renewables. Now, living in the first NSW Renewable Energy Zone (REZ), the Central West Orana REZ, I have many, many concerns and questions about Australia's Net Zero commitments (the Paris Agreement) and the rapid transition to renewables. I fear, it lacks integrity, fit-for-purpose scrutiny, simple cost-benefit-analysis and common sense. I believe, the ultimate financial price will be paid by all Australians, however the environmental, agricultural and social costs will see rural and regional communities bear the brunt of them in the coming years. This presents a massive and unfair intergenerational risk in my opinion.

I fear that Renewables are the "green veil" we have been sold as our countries ticket to reducing greenhouse emissions as Australia's main contribution to fighting Climate Change in line with the Paris

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Agreement. However, this “green veil” of renewables, may end up being the exact opposite, it may cumulatively become the “green dream injection” for the environment and the future for rural and regional Australia. The economic investment opportunity is the “carrot stick” being used for Councils and the regions, but does anyone really know and want to understand what the associated sum-total costs and trade-offs will be? Will loss of community character matter, or loss of families, will damaged water systems, loss of flora and fauna matter? Will combined and simultaneous loss of agricultural land and reduced production of food and fibre matter – what will really matter most? While it is not the responsibility of this project developer, I haven’t found or understand where robust scrutiny has occurred and continued monitoring and assessment of the feasibility, cost-benefits or cumulative and residual impacts of these industrialised energy projects and the rapid transition to Renewable Energy are required.

Project: Tamworth BESS, SSD-23830229 IS NOT IN ACCORDANCE WITH Environmental Planning and Assessment Act 1979 (EP&A Act), Function: State Significant Infrastructure Guidelines

The guidelines state 3.1 Introduction “All SSI projects require the approval of the Minister under Division 5.2 of the EP&A Act before they may proceed. Prior to determination, they are subject to comprehensive assessment with extensive community participation under the EP&A Act. The main steps in the assessment are shown in Figure 1 and explained in more detail in sections 4 to 14 of these guidelines. While all SSI projects undergo the same comprehensive assessment, **the scale and impacts of these projects can vary significantly. Consequently, it is important to ensure that the level of community engagement and assessment required for each project is proportionate to the scale and impacts of the project.** All SSI projects are determined on their merits, having regard to their economic, environmental and social impacts and the principles of ecologically sustainable development.”

The assessments that have been undertaken, eg Social Impact Survey’s etc, are the levels of participation adequate and at a level comparable with that of a **State Significant Project**? If there is no measurable level of participation required – why not?

The Management Plan’s that are yet to be completed, I believe these should be presented for public consideration at the time of exhibition, and should these be included in an amendment report, the public should have provision to comment and raise concerns at that time.

Do the local communities and the LGA have the capability to meet the service demands of these SSDs? The State Government, should be funding and conducting a thorough Capability Study in each LGA and work to collaborate with and support the LGAs to meet these additional demands. Eg. Extra staff in hospital emergency wards, extra emergency services personnel, additional classroom or education requirements, if these requirements aren’t identified and assessed **HOW CAN ANY LGA OR COMMUNITY BE ENABLED TO COPE WITH THE DELIVERY OF THESE PROJECTS?** Once identified – where are these additional service personnel going to come from? It is vital that this planning occurs now, before the impacts are fully realised and experienced.

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IF this project is approved, how will the community benefit from hosting this infrastructure? At the very least, significantly reduced energy costs for the directly impacted residents and communities should be a part of the benefits delivered.

I accept that this submission is relevant to one project, but it would be remiss of me if I did not urge all to consider that while Renewable Energy many have many, many instances where it can be used effectively and sustainably, powering Australia by constructing INDUSTRIAL RENEWABLE ENERGY PROJECTS AND INDUSTRIAL RENEWABLE ENERGY ZONES – termed “*Renewable Energy Power Plants of the Future*” by the Minister, across bushland, agricultural land and in the oceans – across the very environments we are seeking to protect and save, cannot be the solution we continue to accept.

Rigorous scrutiny is needed before it is too late. Scrutiny into the GENCost report (the justification of the cost), scrutiny into the feasibility and cost-benefit analysis of the REZ model and industrialised renewable energy projects, scrutiny into future base-load power provision, scrutiny into utilising *existing infrastructure* for installing solar and photovoltaic energy generation plants, scrutiny into the efficiency and sustainability of large-scale renewable energy generation and constructing new transmission lines to carry power excessive distances to where it will primarily be consumed, scrutiny into the opportunities and benefits of diverse energy generation sources and a balanced transition.

I acknowledge and appreciate both the considerable complexity and the inhibiting bureaucracy around the conversation on how to sustainably power our nation into the future. These two factors deter many Australians from becoming involved or actively seeking to understand. I would urge anyone to dig-in and consider that this “Industrialised Renewable Energy Transition” is not the renewable and sustainable answer for the future of energy generation in Australia.

Item/Details	Comment/Concern/Recommendation
Social Licence	<p>1. Section 4.1 of the Large Scale Solar Guidelines Aug 2022 - Importance of site selection states:</p> <p>“A good site may result in greater social licence to operate, shorter assessment timeframes, reduced offset obligations and fewer conditions of consent to manage residual impacts.”</p> <p>Would the department please evaluate the apparent level, or lack of “Social Licence to Operate”?</p> <p>An excerpt from The-Energy-Charter_Better-Practice-Social-Licence-2023_SUMMARY which can be found at https://www.theenergycharter.com.au/wp-content/uploads/2023/05/The-Energy-Charter_Better-Practice-Social-Licence-2023_SUMMARY.pdf</p>

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	<p>“Social licence to operate is a concept that reflects community acceptance or approval around the operations of an organisation and its developments. Community acceptance comes from prioritising trust, delivering overall positive impact and is granted and denied by the community in line with their social, political and economic conditions.</p> <p>Establishing social licence to operate is not simple due to it being based on the diverse values, interests and concerns that contribute to community expectations and as such requires the consideration of relational aspects between the industry and communities, industry affects, community understanding and confidence in a particular project.”</p> <p>I conclude, that this site is not adequate site selection for a project of this type and scale.</p>
Cumulative Impacts	<p>It is my understanding that it is the requirement of each project to complete detailed assessments as deemed necessary by the SEARS and as set by the Department. This may include: Social and Economical Impacts, Soil and Water impacts, Biodiversity and Environmental impacts, Aboriginal heritage and culture impacts, Noise and Vibration, Visual Amenity, Air Quality, non-Aboriginal heritage, traffic and transport. An additional assessment which must take place is the cumulative impact assessment and must consider proposed, approved and operating - especially biodiversity, socio-economic and construction traffic, and must be assessed in accordance with the department’s Cumulative Impact Assessment Guidelines for State Significant Projects (PDF 1,393 KB).</p> <p>While the cumulative impact guidelines are in place, there is no requirement within these guidelines to assess on combined impacts direct to a community or adjoining landholder etc.</p> <p>Until such time as combined noise and vibration and combined visual amenity assessments etc are provided by the department to the Councils and Communities, these project approvals must be deferred.</p> <p>Can the department ensure the community that adequate “Combined incremental assessments”, particularly considering social impacts to concerned communities, visual impacts to sensitive receivers/adjoining landholders and combined soil and water impacts etc, as per the guidelines have been completed?</p>
Paris Agreement	Climate Change (Net Zero Future) Act 2023

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	<p>3 Purpose of Act</p> <p>(1) The purpose of this Act is to give effect to the international commitment established through the 2015 Paris Agreement</p> <p>(C) increase the ability to adapt to the adverse impacts of climate change</p> <p>does not give full effect to the Paris Agreement 2015 Article 2 1 (b) as it omits the final part of the commitment as demonstrated below:</p> <p>b. Increasing the ability to adapt to the adverse impacts of climate change and foster climate resilience and low greenhouse gas emissions development, in a manner that does not threaten food production;</p> <p>“In a manner that does not threaten food production”. In its assessment, the Department made an error in its calculation of the area of Agricultural Productivity loss. While this was corrected through the process of the public meeting, how can the public be assured that there are no further errors of critical importance? This particular error under represented and mislead the community as to the total loss of Agricultural land.</p> <p>The loss of agricultural land is in a manner that does essentially threaten food production. Consider the flow on effects of soil degradation and dryland salinity occurring due to the installation of large-scale solar projects and the threats to future food production are heightened. This should not be over-looked or undervalued.</p>
Toxic pollution	<p>Are there dangers to the environment and the community from toxic pollution or accidental toxic exposure?</p> <p>Are there toxic risks to the environment and the air quality in the event of a fire?</p>
Soil and Water	<p>Soil and water impacts – it appears only desktop studies have been conducted, this is inadequate given the potential seriousness of the impacts. Erosion, soil microbial losses, risk of dryland salinity occurring etc. This is a very real concern that needs thorough investigation by suitably qualified and experienced independent assessors.</p>

I urge the Department to not grant approval to this project, due to the significant risks as highlighted: biodiversity, social and economical, soil and water, visual amenity, fire risk - just to name a few. At the very least, approval should be deferred until such time as extensive combined, cumulative and residual impact assessments are conducted for the entire Tamworth region and New England REZ and the detailed findings

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are made available to the public. The combined projects need rigorous assessment and the public deserve the opportunity to gain this understanding of what the combined project impacts will look like and be.

Thank you for the opportunity to provide feedback regarding this project.

Yours Sincerely,

Sal Edwards

Volunteer, Farmer & Community Capacity Builder

Warrumbungle Region NSW