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Sandy Creek Solar EIS Submission 24th June 2024

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Project: Sandy Creek Solar, SSD-41287735

1700HA Project footprint, 1.5million solar panels

Director – Energy Assessments
Development Assessment
Department of Planning and Environment

OBJECTION SUBMISSION

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

Please accept this as my objection to the Sandy Creek Solar, SSD-41287735

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

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:

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- Combined project impacts (Visual, noise, social and economical) on the Dunedoo/Elong/Goolma and Spicers Creek communities
- 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

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demands a fair and equitable delivery of a diverse range of sustainable energy generation and storage solutions.

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: Sandy Creek Solar, SSD-41287735 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.

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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 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 large-scale renewable energy projects and the rapid transition to Renewable Energy are required.

Project: Sandy Creek Solar, SSD-41287735 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

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personnel going to come from? It is vital that this planning occurs now, before the impacts are fully realised and experienced.

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 <i>social licence</i> 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>

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	<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> <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,</p>

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	visual impacts to sensitive receivers/adjoining landholders and combined soil and water impacts etc, as per the guidelines have been completed?
Paris Agreement	<p>Climate Change (Net Zero Future) Act 2023</p> <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 from panels (working or damaged) or accidental toxic exposure?</p> <p>Are there toxic risks to the environment, water and the air quality in the event of a fire? How will they be adequately contained?</p>
Soil and Water	Soil and water impacts – it appears only desktop studies have been conducted, this is inadequate given the potential seriousness of the impacts. Land degradation issues including: erosion, soil microbial losses, risk of dryland salinity occurring etc. This is a very real concern that needs thorough field investigation by suitably qualified and experienced independent assessors.

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Combined Project Impact Assessments	There are five proposed REZ infrastructure projects adjacent, or within approx 3 km, to the Project footprint - Energy Co Elong Energy Hub and transmission lines, Cobbora Solar, Spicers Creek Wind, Dapper Solar and Orana Wind. Could the department please ensure that adequate combined project impact assessments are available to the public and available for exhibition. I note a lack of detailed cumulative impact assessments in the Appendix documents and limited detail of assessments in the main EIS report.
	In 2021, the local study area had a total population of 1,334 people. The Social impact assessment only interviewed FOUR landowners, a single meeting with First Nations stakeholders, a single meeting with Dubbo Regional Council, a single telephone conversation with Dubbo Chamber of Commerce, a pop-up stall at Dunedoo Show in 2023, and an online survey that went for 3 months. There is insufficient evidence for adequate consultation numbers for this. Where there is an extremely low portion of the community adequately consulted and recorded, there leaves little value in the small amount of data the consultation achieves. Community consultation is inadequate and should not be accepted by the department.
Cumulative impacts – accommodation and housing	An influx of out of area workers will reduce access to and place additional pressure on local services – health, education, transport and infrastructure.
Visual Landscape change	The EIS and Appendix documents state that the visual landscape character of the area will change from predominantly rural agriculture to renewable energy infrastructure. The public has not been adequately consulted on this change for the future and the developer has by no means obtained a significant level of community acceptance.
Vegetation planting	The EIS states "one non-associated receptor (R09) was assessed as having a high visual impact as a result of the Project, and one non-associated receptor (R14) is predicted to experience a moderate visual impact" Mitigation: vegetation planting. Vegetation planting is never adequate, is undertaken too late and will not sufficiently "mitigate".
Urban Heat	<p>The dangers of urban heat</p> <p>Average temperatures in large cities are 1 °C to 3 °C higher than in rural areas, as urban areas tend to trap more heat than natural environments. These higher temperatures can affect human health and wellbeing, economic productivity, the environment, critical infrastructure and services.</p> <p>Some urban communities are more vulnerable to higher temperatures because of the 'urban heat island' effect, which occurs in urban areas where paved, dark coloured surfaces such as roads, roofs, and car parks lead to heat being trapped.</p> <p>Source: https://www.planning.nsw.gov.au/policy-and-legislation/resilience-and-natural-hazard-risk/urban-heat</p>

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	<p>Could the Department please ensure that extensive independent research has been undertaken to evaluate the dangers of radiant heat from large scale solar projects. The scale of this project increases the risk of excessive heat in the environment from the solar panels and would only contribute to endangering the ecosystems and therefore the existing climate.</p> <p>I have no experience in the research or monitoring of this heat, however, I have witnessed first-hand the visible heat radiating of another large-scale solar project, similar to the effect you see on a hot day in the desert, radiating of the dirt and sand.</p> <p>This heat should be assessed and considered prior to running livestock under the panels and must be measured from a whole-of-project perspective as to what the impacts are on the environment. We do not want these projects to create “Urban Heat Islands” in what is currently a rural area with healthy and diverse ecosystems and inhabitants.</p>
Decommissioning	<p>Decommissioning suggests only removing above ground infrastructure (with the agreement of the landowner). It must be conditioned that all underground cabling, posts, concrete etc be removed at decommissioning. How will the land suitably rehabilitate and return to native vegetation, or farming of all the underground infrastructure remains.</p>
Fire Risk	<p>Despite desktop assessments and department feedback from the NSW RFS, there is no substantial or ground-truthed evidence to suggest that large-scale solar projects do not pose a significant fire risk. Anyone familiar with either aerial or ground fire fighting can see the logistical challenges of the type of build a project such as this presents to fire-fighting, let alone understand the dangers of the components of the panels once on fire – to the firefighters, to the ground and waterways and to the air and atmosphere. There is no sufficient research demonstrated that these risks are adequately considered and can be safely mitigated. Is this another “asbestos” type story for the future generations?</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 Dunedoo region and Central West Orana REZ and the detailed findings 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,

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