



Nature Conservation Council

The voice for nature in NSW

Ms. Carolyn McNally
Secretary
NSW Department of Planning & Environment
Level 22, 320 Pitt St
Sydney, 2000

7 May, 2019

Submitted via <http://majorprojects.planning.nsw.gov.au>

NCC Submission in support of Wollar Solar Farm Project (SSD 9254)

Dear Sir/Madam,

Thank you for the opportunity to comment on the recent application by Wollar Solar Development P/L to build a solar farm at Wollar, near Mudgee.

The Nature Conservation Council of NSW (**NCC**) is the peak environment organisation for New South Wales, representing over 150 member societies across the state. Together we are committed to protecting and conserving the wildlife, landscapes and natural resources of NSW.

It is our position that this proposed solar farm would deliver a net-positive impact on nature and for the citizens of New South Wales and as such we support planning approval for this project.

Increased investment in renewable energy projects such as solar farms is an essential step towards a low-carbon future. This project will significantly add to the installed renewable energy capacity in NSW. Further, it will contribute to the NSW government's pledge to support the federal renewable energy target of 33,000GWh of renewable power generation by 2020, and reach the NSW government's firm commitment to reaching net-zero emissions .

Climate change is already having significant impacts on nature and these will only get worse unless projects such as the Wollar solar farm are rapidly deployed. Climate change is also impacting the residents of New South Wales, specifically through health impacts, and impacts on infrastructure. Renewable energy projects such as the Wollar solar farm are crucial to avoiding dangerous climate change. We ask that your assessment of this project considers the broader benefits of avoiding climate change by proceeding with this project.

We would like to highlight some of the benefits that the Wollar Solar farm would offer to the people of NSW:

- The Wollar Solar Farm would produce 290MW of renewable energy, to be supplied directly to the national grid. The EIS states that this will be enough to power 104,926 average NSW homes.
- By reducing fossil fuel generation it would reduce airborne pollutants,

including over 515,500 metric tonnes of CO₂ each year;

- It would reduce reliance on coal fired power plants – diversifying the state’s energy mix and promoting renewable energy production;
- It would contribute to our efforts to avoid dangerous global warming, which is threatening human and ecosystem health.

Comparison with the proposed Bylong Coal Project

NCC has opposed the Bylong Coal Project¹, located 20 kms to the east of the proposed Wollar Solar Farm. NCC wishes to draw attention to the contrast between the Wollar Solar Project, which is sustainable and consistent with ESD principles as required under the NSW Environmental Planning and Assessment Act, 1979, versus the proposed open cut Bylong Coal Project, which is fundamentally unsustainable and inconsistent with ESD principles, as argued in our submission opposing the Bylong Project referenced below. For example:

Sustainability:

- When the Wollar solar farm is no longer viable after 30 years, it is proposed that all on site infrastructure, with the possible exception of the onsite substation, would be removed and the land returned to the agricultural purposes it was used for prior to the development². This is consistent with the concept of sustainable development.
- In contrast, the proposed Bylong Coal Project will leave behind the moonscape which inevitably follows open cut coal mining. The proposed project will disturb almost 3000 ha of prime agricultural land, and permanently destroy those areas within the open cut and emplacement areas. This is fundamentally inconsistent with sustainable development.

Biodiversity:

- As illustrated in the EIS³, the Wollar Solar Farm avoids any major areas of vegetation, thus minimising any biodiversity impact. That impact would have occurred many years ago when the area was first cleared for agriculture. The EIS Executive Summary notes that there will be no impact on threatened species – in a worst case impact assessment, there will be zero species credits⁴. NCC notes that 747 ecosystem credits could be generated in a worst case scenario. These must be covered by physical offsets secured in perpetuity – payment options into a Biodiversity fund or ‘funding a biodiversity action’ are totally unacceptable.
- In contrast, as illustrated in the NCC submission referenced above, the Bylong Coal Project will destroy 229 ha of suitable habitat for the critically endangered Regent Honeyeater. A number of other threatened mammal and bird species will be adversely impacted by this proposed project, as will two threatened ecological communities. The proposed biodiversity offsets strategy will be totally inadequate in providing defensible offsets for these adverse

¹ NCC submission, Bylong Coal Project

² Wollar Solar Farm EIS, p9

³ Wollar Solar Farm EIS, Fig 1.5, Indicative Infrastructure Layout, p 10

⁴ Wollar Solar Farm EIS Executive Summary, p xxvi

impacts.

If you would like any further information regarding our submission, please don't hesitate to contact Brad Smith in our office on (02) 9516 1488 or at bsmith@nature.org.au.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Kate Smolski', written in a cursive style.

Kate Smolski,
CEO