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12 November 2019

Mr Jim Betts
Secretary,
Planning, Industry & Environment
GPO Box 39
SYDNEY NSW 2001

Re: Objection to proposed Jindera Solar Farm (SSD – 9549)

Dear Mr Betts,

Thank you for the opportunity to comment on the Environmental Impact Statement (EIS) prepared by ngh environmental on behalf of Jindera Solar Farm Pty Ltd dated September 2019.

As a local farmer I am writing to strongly object to the construction of the proposed 521 hectare Jindera Solar Farm for the following reasons:

- 1. Fragmentation and loss of highly productive farming land** – Australia is continuing to experience a loss of highly productive land at an alarming rate despite predictions that our population could reach 35 million by 2050. There is a real chance that Australia could become a net importer of food if our farmers are not able to meet the competing needs of both increased domestic consumption and ongoing export orders.

Australia **lost 5.9 million hectares** of agricultural land during the period 2001 to 2009 according to the ABS, 2010a. While the majority of loss was due to urban expansion it is implausible that we would continue to allow a further loss of highly productive farming land to a solar farm simply due to its proximity to a nearby electricity substation and connecting transmission lines.

The loss of agricultural farm land was widely reported in 2012 including an article in the Sydney Morning Herald titled "Agricultural land diminishing, statistics show".

<https://www.smh.com.au/national/agricultural-land-diminishing-statistics-show-20120525-1za05.html> refers.

In the case of the proposed Jindera Solar Farm it will lock up 521 hectares of highly productive farming land for at least 30 years. This land is located in a relatively reliable rainfall area (compared to most) and currently produces:

- High value oil seed and cereal crops (Canola, Wheat etc.),
- Prime sheep & cattle;
- Fine wool and fat lambs;
- Certified seed production; and

- Abundant hay and silage fodder which is critical to meeting Australia's needs both now and into the future.

In fact, the land is so productive that we have been able to continue to sustainably produce food and fibre even though our region has been declared “*drought affected*” and at a time when much of Australia's farm land is unproductive due to severe drought conditions

- 2. Claims by the proponent that the land will remain in agricultural production through the strategic grazing of sheep** – The proponent (Green Switch Australia) mischievously claims that the land will not be lost to agricultural production as they may strategically graze sheep under the solar arrays¹. This is highly unlikely as grazing animals generate significant dust which is detrimental to the efficient operation of solar panels. Such intensive grazing would not only create dust but also increase the volume of water required to clean the panels. It is debatable whether the water consumption figures in the EIS document truly reflect this requirement. This is of genuine concern due to the fact that water is a scarce commodity particularly now and into the future.

It should be noted that in 2018 ABC Landline² featured the construction of a controversial new large scale solar farm in QLD. During the interview, the Construction Engineer confirmed that it was not possible to graze sheep under the solar arrays.

In addition to the above, I have personally spoken to two other Construction Engineers on solar projects within Victoria and NSW who verbally confirmed the views expressed by their QLD colleague. Neither Engineers wished to be identified due to the potential loss of employment opportunities.

The Department and Independent Planning Commission (IPC) are probably not aware that the host property adjoining Walla Walla and Ortlipp Roads is so productive that for many years it has sustained a successful high value *Certified Pasture Seed Growing Operation* combined with rotational cereal cropping and fat lamb production. By any yardstick, this is a highly productive parcel of agricultural land which is supported by a reliable water supply. Furthermore, the parcel of land has the ability to be connected to “town water” to drought proof it further.

This land was previously classified as Class 3 land under the repealed legislation despite a long history of fertilizer (and other inputs) which have dramatically improved the lands' productivity/sustainability. Accordingly, such changes across much of NSW's productive agricultural land has delayed the release of the new Primary Production SEP and it is inappropriate for Green Switch Australia to base their case on repealed legislation.

- 3. Impact of “real” long term jobs within the agricultural sector** – The EIS claims that the project (should it proceed) will generate 200 jobs during the construction period and

¹ EIS, Page 62, Table 4-5 Directions, actions and consideration of the NSW Riverina Murray Regional Plan 2036 – EIS Considerations Para 4 and 5.

² I have written to Landline to confirm the date of the program and will separately advise your Department upon receipt of the advice.

2 to 3 during the operational phase. Such numbers do not compare favourably to existing jobs across the agricultural sector which will be affected should the proposal proceed. The proposal (should it proceed) will directly impact on the employment and profitability of wide a range of people across the agricultural spectrum including:

- Mechanics;
- Agronomists;
- Farm machinery suppliers;
- Stock and Station Agents;
- Spray and Fertilizer Suppliers;
- Seed and produce merchants;
- Tyre dealers;
- Freight carriers (stock and grain);
- Saleyards (reduced stock numbers being offered for sale); and
- Farm contract labour.

The proposal will also indirectly affect other persons across the food chain including dairy farmers who rely on a reliable supply of cattle fodder and the consumer who will ultimately pay higher prices for food due to a reduction in food supply.

- 4. Visual impact and amenity** – The proposal (should it proceed), will adversely impact on the visual impact and amenity of at least 26 residents. According to your Department this is the highest number affected by any solar farm proposal in NSW.

My 87 year old mother-in-law is directly affected as the proposed Jindera Solar Farm is clearly visible from her home. She will also be impacted by the cumulative effects of the proposed Glenellen Solar Farm due to her location should it proceed.

Currently she looks out at quiet open paddocks with cattle grazing. Despite ongoing consultation with the proponent (Green Switch Australia) she has not been able to reach agreement on a suitable form of screening that will adequately mitigate views of the 3 metre high solar arrays. During the consultation I requested that any tree screening along her boundary be a minimum of 4 metres in height to both hide the solar arrays and associated security fence. We now find that they are proposing to plant small trees and install shade cloth on the full length of the security fence³. We do not consider this to be in any way a show of “good faith” negotiation. Synthetic shade cloth also presents a genuine risk of fuelling a grass fire during a fire event. Undoubtedly the unsightly cloth (which is incompatible with the existing farm landscape) would need to remain in place for many years until the trees were tall enough to screen the infrastructure. This unsightly material would undoubtedly put downward pressure on property values.

- 5. Devaluation of property values** – The proposed Jindera Solar Farm will adversely impact on the property values of some 26 residences / landholders.

In the case of my mother-in-law, she has resided and farmed her property at 151 Ortlipp Road Jindera for the past 30 years. It has recently been valued at between \$850,000 and \$1.1 million. This valuation is based on the highly sought after 40 hectare property

³ Page 145 Results & Visual Concerns dot point 1.

size in addition to the infrastructure (Brick veneer home, shedding & cattle yards) combined with pasture improvement and a strong fertilizer history which has been undertaken on the land throughout the 30 year period. Unfortunately, the Valuer was not able to provide a price post construction of a solar farm but expects that a significant devaluation would occur at Auction.

We recently attended a public forum hosted by the Department and were advised that the Government does not financially compensate landholders should there be a resultant reduction in property values due to the construction of a solar farm. It seems that the affected property owners will be left with no option but to undertake class action to achieve compensation should the proposal proceed.

- 6. Increased heat carried by prevailing wind** – I am concerned that my mother-in-law's home will be affected by increased heat, especially during summer should the proposal proceed. Her home is downstream of and in close proximity to the proposed solar farm. We are concerned about the potential heat that will be generated by the solar arrays and carried in her direction by the prevailing wind. In 2018 we suffered a number of days in excess of 40 degrees Celsius which was not only demanding for stock but challenging for herself. Despite the proponents claim that studies into *Heat Island Effect* show negligible temperature increases we remain unconvinced that the temperature will not increase through direct heat radiation. We are of a view that further studies into Heat Island Effects are required before a further 26 residents are potentially affected.

It should be noted that any increase in temperature will have an adverse effect on the capacity of farm dams through increased evaporation.

In closing, thank you for the opportunity to comment on the EIS and I would ask that the IPC and Minister to not approve the application given it will:

- remove significant areas of highly productive farmland from production for up to 30 years;
- visually impact on neighbouring residential amenity of up to 26 residents;
- result in a significant devaluation of property values; and
- potentially increase mid-summer temperatures for neighbouring properties downstream of the solar arrays.

Further to the above, we are firmly of a view that the proposed Jindera Solar Farm should not be allowed to take highly productive farmland out of production as the decision to locate it on the proposed land is simply based on a business opportunity by the proponent due to the proximity of a nearby substation and transmission lines.

Given the above, is it timely now for the NSW Government to raise the issue at COAG and seek agreement from the Federal Government to work together to identify suitable solar farm locations (in marginal farm land areas) throughout Australia? The Federal Government could then fund the establishment of strategic substations and transmission lines which connect to the grid that could be put out to tender. This would alleviate many of the issues faced by proponents wishing to establish solar farms simply due to their proximity to substations and transmission lines.

Alternatively, COAG could consider the merits of installing solar panels on all domestic and industrial buildings with a view to meeting our current and future energy needs. This may not be palatable to Governments' as it would require a subsidy to make it happen.

I declare that I have not made a donation to any political party in the past five (5) years.

Please don't hesitate to contact me on 0418218630 or n_maher@bigpond.net.au should you have questions in relation to this matter.

Yours sincerely,

Norm Maher, OAM