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Culcairn Solar Farm SSD-10288

I have not made any reportable political donations in the previous two years.

### **OBJECTION TO PROPOSAL**

I wish to state that I am not against renewable energy or solar panels. I understand that there is a need for such projects. However, strong consideration needs to be made as to the suitability of where these projects are placed. I am a landholder that is a neighbour to the proposed development and object to the proposal on the following grounds:

#### **1. Loss of Prime Agricultural Land**

This land continually and reliably produces grain, fodder and hay yearly. It is highly sought after, highly productive land. NEOEN are claiming that this land is Class 4 Land under the Important Agricultural Land Mapping. This mapping was completed during the 1980's and is sorely outdated. Greater Hume Shire Council have recognised the value and importance of this farming land and other land within the Shire and has petitioned the Department of Primary Industries to reconsider the land classing. I understand that this has been completed and the Class of Land has been changed. This has not yet been released to the public and is awaiting approval from the Political Leadership. **I urge the Department of Planning to withhold making any decision in relation to this proposal until this mapping is completed and released to the public.**

The last two years has seen drought affecting almost all of NSW. This land still produced grain, hay and fodder when the majority of farms outside of our area were unable to produce. This permitted the grain, hay and fodder from this property to be used to assist other farms feed their livestock.

This year we have seen devastating bushfires destroy towns and thousands of acres of farmland causing a massive need for hay and fodder to feed stock. Literally thousands of bales of hay were stripped off this property this year that was purchased by the Government and shipped north to save stock. The conversion of this land from productive agricultural land to an industrial development, removes the ability to use this land to produce much needed and highly valuable agricultural products.

NEOEN claim that their proposal only encompasses 0.44% of agricultural land in the Greater Hume Shire Council. Clearly, not all land within the Shire is equal. This land is ideally suited for production of hay, grain and fodder and has been its principal use for

decades. Removing this land from agricultural use is a permanent loss to this countries ability to provide for itself.

NEOEN assert that after construction, they can graze sheep under the solar panels and achieve 80% of agricultural capacity. This is blatantly incorrect. Once the solar panels, inverters, associated equipment and fencing is in place, the only thing that will grow on that property is weeds. The use of this land over the past decades has solely been cropping. Very light grazing by stock has occurred over the last two years under the management of the property by the FEUERHERDT's. There is no pasture to speak of. As soon as those paddocks are left fallow, weeds will grow in abundance. This will not be able to be treated by the developers. I have visited the Coleambally Solar Site that is owned by NEOEN. I observed that the entire property consisted of broadleaf weeds including Patterson's Curse, Marshmallow, Cape Weed and infestations of Roly-Poly weeds. The weed management of the Coleambally site mow between the panels on zero turn lawn mowers.

Mowing weeds does not get rid of weeds. It is an ineffective practice. Mowing weeds spreads the seeds of the weed and causes the weed to grow wider. Sheep cannot be used to graze weeds as many weeds are toxic to sheep and they won't eat them. Pasture cannot be sown once the solar panels and infrastructure is in place because there is simply insufficient room between the infrastructure to sow it. Without the ability to sow pasture, the sheep will have no high-protein food to eat, causing them to be unable to gain weight which renders the use of this land for agriculture purposes as useless. The assertion that sheep will be used the graze under the panels is simply marketing to appease the concerns of people that have no understanding about agriculture. **I urge the Department of Planning to strongly consider that if this proposal is approved, then the use of this land will be prohibited from being used in any meaningful way for agriculture. I urge the Department to seek advice from independent experts in agriculture.**

## **2. Site Selection**

My family and I have travelled vast swathes of Australia and have seen numerous solar developments. The majority of these developments are on isolated, non-productive land and have next to no impact on neighbouring properties. This proposal affects everyone who has a neighbouring property. Every single neighbour is against this development.

The size of this development is staggering. It is proposed to encompass close to 3500 acres, consist of 1.1 million solar panels and be 7km from one corner to the other. This development will be larger than the neighbouring towns. NEOEN assert that the site does not have a visual impact on surrounding properties. The land is so flat that you can see for several kilometres. Our property in particular is elevated and we have unobstructed views for 5 kilometres over the entire site. The view from our property of this development encompasses 120 degrees.

**I urge the Department of Planning to strongly consider the impact of this proposed development on neighbouring landholders. If this proposal is not rejected outright, then the size of the development should be reduced with increased buffer zones to minimize the effect on neighbouring properties.**

### **3. Construction Disruption**

Construction is scheduled to last for approximately 18 months. All construction traffic (up to 500 vehicle movements per day, 6 days per week) are proposed to travel along Benambra Road onto Weeamera Road and into the development site. Weeamera Road from the intersection of Benambra Road is bitumen to the entrance to the Boral Quarry. From this point north to Cummings Road, the road is dirt. The dirt section of this road has less than 20 cars per day travelling upon it.

NEOEN have proposed widening the dirt section of Weeamera Road to 6 metres wide and placing a light sealing of bitumen upon it. I do not believe that this is sufficient. I have reviewed Development Approvals for other similar sites and observed that 8 metres wide is the preferred width. I don't believe that a light bitumen sealing will be sufficient with the amount of heavy vehicle movements. I am concerned that such movements will significantly impact the road and upon the construction being finished, the road will be in a such a poor state that the Greater Hume Shire Council will then be required to fix the road at rate payers expense.

Along with the massive increase in traffic movements per day, the noise from traffic and construction will be a massive impact on neighbouring property owners. Construction is scheduled for 7am – 6pm weekdays and 8am – 1pm on Saturdays. **I urge the Department of Planning to impose conditions upon the developers, that increased noise operations such as earth moving, ramming of poles into the ground etc are not to commence until after 8am and conclude by 4pm so as to not overly affect neighbours.**

### **4. Fire Risk**

In the past year, New South Wales, Queensland and Victoria have been seriously and significantly impacted by fire with numerous deaths to civilians, emergency services workers and destruction of homes and towns. Local Rural Fire Service (RFS) members are seriously concerned with fire either starting within the proposal development or impacting the proposed development. Members have stated that they will not enter any solar development to combat fire due:

- Increased risk of entrapment by large industrial scale fencing, long rows of solar panels and associated equipment.

- Increased risk of electrocution by combating fire around equipment used to produce electricity and a severe lack of understanding as to what infrastructure may contain residual electricity.
- Increased risk of exposure to toxic chemicals as a result of burning solar panels, wiring, inverters, batteries and other electrical infrastructure.

The result of RFS members not entering a solar development site to combat fire, dramatically increases the size of the fire before it leaves the site and is able to be combatted. This increases the risk to volunteer fire fighters, increased the risk that neighbouring properties will be impacted and significantly increases the risk to neighbouring towns. Should a fire impact the development, toxic fumes will impact local towns. It should be noted, that due to the massive size of this development, it will be about 4 kilometres from Culcairn and about 3 kilometres from Walla Walla. It is in close proximity to two towns.

NEOEN have proposed the placement of water tanks within the development to assist in the mitigation of fire risk. These are insufficient as NSW RFS members have stated that they will not enter the site in the event of a fire.

NEOEN have stated that they will ensure appropriate fire mitigation strategies because of the amount of money they have invested in this project. Fires this year have destroyed towns regardless of how much money the town was worth or how well intentioned people were to stop fires. We have seen raging bush fires decimate towns, regardless of the assertions of NEOEN, they are unable to stop fire impacting their site or to stop fire from igniting on their site and impacting neighbouring properties and towns. **I urge the Department of Planning to ensure consultation between NEOEN, NSW Rural Fire Service, NSW Fire and Rescue and local RFS brigade members is undertaken to mitigate concerns in relation to fire. I am seriously concerned that NEOEN will not engage with these groups should the development be approved and the problem will fall to volunteer RFS members to solve. This will result in increased fire risk to neighbouring properties and towns and in the event of a fire, significantly increase the risk of injury or death to volunteer fire fighters.**

## **5. Do Nothing Approach**

NEOEN repeatedly quote the 'Do Nothing Approach' in their marketing documents. We are not against solar developments. We are not against renewable energy developments. **BUT**, strong consideration needs to be made as to the suitability of the area where they are to be built. The only reason that NEOEN is interested in this land is because it is flat and that high-voltage electricity transmission lines traverse the site. They are not concerned about the loss of important and consistently reliable agricultural land. They are not concerned

about the adverse effects upon neighbours. They are not concerned about the loss of agricultural jobs within the region.

We are not saying, Do Nothing. We are saying, put these developments on non-productive agricultural land in areas that do not impact adversely on neighbours.