

**Karen Ferguson
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Submission Oxley Solar Farm -SSD No 10346

I am submitting an objection to the proposed Oxley Solar Farm Development (SSD No. 10346). I would like to state up front that I am fully supportive of the need for increased renewable energy capacity in Australia. However, each renewable energy development must consider the full economic, environmental and social impacts and in this case, the developer has not adequately considered the magnitude of these impacts or provided a compelling narrative on how they will/can be mitigated.

The specific grounds for my objection include:

- The significant loss of amenity value for local and prospective residents and tourists to Armidale.
- Significant environmental risks.
- Significant cumulative impact of several large solar farms within the area.

Loss of amenity value

I note that this site was chosen after reviewing “a large number of sites” across NSW (page 18 EIS). This seems to be a standard statement in the EIS or development applications by renewable energy developers and typically, the exact number and location of these sites is not provided, as is the case here. Perhaps this detail should be a pre-requisite in future renewable developments applications as it is difficult to accept such statements without corroborating evidence.

Despite the claims within the EIS that the DPIE’s Large Scale Solar Energy Guidelines were followed in the site selection process, it is quite clear that some of these guidelines were simply not given adequate consideration and weighting. It is difficult to believe that this was the most suitable site when the development will visually disaffect so many local residents. In Appendix E Landscape and Visual Impact Assessment, it shows on Figure 5 (page 7) that there will be approximately 70 residents that will have some degree of visual sensitivity to the development and therefore, a loss of amenity value. In their viewpoint analysis, 5 of the 15 viewpoints evaluated would have moderate to high visual impact. Proportionally, this seems rather high, but two factors need to be taken into consideration. Firstly, it needs to be stressed that these viewpoints were on publicly accessible points and not necessarily from the individual residences that will be visually disaffected by the development. Secondly, and perhaps more importantly, the visual impact analysis did not take into account the cumulative visual impact of two additional nearby solar farms (Stringybark and Olive Grove Solar Farms – approved in 2019). Stringybark and Olive Grove are directly adjacent to the west of the proposed Oxley Solar Farm. However, whilst the cumulative visual impact of all three solar farms was noted (page 280) it was not considered in the context of the evaluation of visual impact. The significant cumulative visual impact was largely played down within the EIS

This was an oversight in my opinion because when the cumulative visual impact is genuinely taken into consideration, it is clear there will be a loss of amenity value for the significant number of residents along Castledoyle, Milne, Andersons, Blue Hole and Gara Roads.

In addition to the residents around the proposed site, the solar development will be easily seen by visitors travelling to (along Blue Hole Road) and walking (Threlfall Walking Track) within the world heritage listed Oxley Wild Rivers National Park. There are also several misleading statements regarding visual impact analysis (appendix E). For example, Section 6.1.2 p 83:

“There will be limited areas within publicly accessible land where the development can be viewed in its entirety. The highest visual impact is likely to be from Gara Road and Silverton Road. These roads are generally used to provide access to isolated homesteads and have a relatively low frequency of use.

Views to the Project will also be available from a small portion of Blue Hole Road, which is utilised by visitors to the Oxley Wild Rivers National Park and has a slightly higher frequency of use. Views to the Project have the potential to be visible to the north of the National Park”

The volume of traffic along Blue Hole Rd is significantly higher than that along Silverton Rd. For example, Armidale and Dumaresq Council data indicates that approximately 25,000 tourists and locals visit the Blue Hole and Oxley Wild Rivers National Park annually. The industrial development will be easily seen to the north for those visiting the National Park and walking along the Threlfall Track. The presence of an industrial solar farm on route and visible from the park will clearly compromise the amenity value and visual character of the park.

To mitigate the visual impact, the developers have proposed to plant vegetative screens. However, given the location of the development, topography and the expected growth rates of the proposed species, this is unlikely to be an effective strategy for the disaffected residents and for visitors travelling to the Oxley Wild Rivers National Park.

Significant environmental risks.

Apart for the amenity value impacts, the location of the proposed development is problematic on environmental grounds. Once again, the rationale for constructing a solar farm over two pristine waterways (Gara and Commissioners Waters) and immediately adjacent to a National Park is highly questionable. Given that it is clearly stated within the EIS that “the impacts of shading and diversion of rainfall runoff from the panels is largely unknown” (page 88), how can the developers be so confident that the environmental risks can be effectively mitigated? The convenient purchase of NSW Biodiversity Offsets is hardly comforting if there is a significant compromise to the biodiversity and surrounding environment due to the solar development.

I don't believe the proponents have adequately addressed how erosion on the site will be mitigated. Secondly, in the event of bushfire or hailstorm there is a very high risk that pollutants such as lead or carcinogenic cadmium will be released from the solar panels into the pristine Macleay River catchment and in turn, threaten critically endangered species such as the Peppercorn tree frog.

Cumulative Impact.

The key point to emphasise about the cumulative impact of proposed solar developments within the region is that the EIS is **factually incorrect**. In Table 8-24 Major Projects within the Armidale Dumaresq LGA (page 278) it states that the Stringybark Solar Farm is operational. This is simply wrong as work on that development has **not commenced**. How can the authors of the EIS get it so wrong especially when the Stringybark Solar Farm is immediately adjacent to the Oxley Solar Farm? An error of this magnitude seriously questions the credibility of the EIS.

Given this and as noted above, the cumulative impact of the contiguous solar developments (Stringybark, Olive Grove and Oxley) requires re-evaluation before the development can be approved.

Finally, I reiterate that we are strongly in favour of renewable energy but the justification for increased renewable energy developments should not be unconstrained nor should it override other important environmental and community considerations. I am opposed to the Oxley Solar Farm development for the reasons stated above.

Sincerely

Karen Ferguson