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Submission re. OXLEY SOLAR FARM  
Application No SSD-10346

I support renewable energy projects in general, including solar power, and support this project in particular.

I object, though, to the lack of thoroughness and completeness demonstrated during parts of the process to date - and I especially object to the significant lack of consultation.

I have never made a political donation.

Signed

Gordon Smith

## Preamble

My property is situated a little over 2 km to the east of the closest part of the proposed Solar Farm site. I do not expect to see any part of the Farm from my residence given heavy tree cover, but most likely will see it from the south-western corner. My property looks downslope to the proposed site.

My property is registered with Land for Wildlife and I have a special interest in creating and maintaining suitable fauna habitat where possible.

In addition many species of indigenous, terrestrial orchids and other flora are making a comeback given that the property hasn't run stock for over 20 years.

I can only imagine that the area proposed Farm site is similar, in places, to my property and thus many of the same flora and fauna may be present.

## Issues

### 1. Fauna and flora

By necessity, due to the extremely short time spend undertaking fieldwork by various consultants, the species of fauna and flora identified appears to be limited. I have included as an appendix the fauna and flora observed, and many photographed, on my property (including endangered species).

Given that I understand a high security fence will be erected around the site(s) I'm concerned about the restriction to free movement through the area by endangered species - viz. koala.

**Question:** What mitigation is being undertaken to minimise or negate interruption to koalas (and other species) moving through the area?

### 2. Road use - Silverton Road

Silverton Road is a narrow, rural road, not even two lanes wide, used by the handful of families who live in this area, by associated workers, vehicles transporting stock, feed and other supplies, and tourists following an established Geocaching route.

It appears to have been determined that this road will be used by a low number of Solar Farm worker's vehicles for access to, and egress from, the south-eastern corner of the proposed Farm at the corner of Silverton Road and Gara Road.

I expect that at times there will be more vehicles traversing the Road than the project is reporting. While it has been reported that there have not been any vehicular accidents on Silverton Road, it's certainly true that there have been many near misses in places.

Given that I have walked dogs along Silverton Road almost every morning for two decades I feel knowledgeable enough to know where the blind spots are, and those on-road places from where I have no escape path should vehicles appear at speed. There is no provision for pedestrians on that road.

**Question:** What mitigation will be undertaken to prevent accidents (both vehicular and pedestrian) given the aforementioned blindspots, for example, and due to the road not being suitable for higher traffic levels (especially when wet)?

### 3. Consultation by the project

The “Community Consultation Principles” (APPENDIX C COMMUNITY CONSULTATION PLAN) correctly identifies that:

*“Best practice community consultation involves the community in all decision making stages of a project. The community plays a role from project conception, through the assessment process and on to project development. ”*

I have had no consultative interaction with any member of the project. Indeed, email I sent to the project asking for information regarding solar panel and other electromagnetic emission and interference to my radio receivers has been ignored.

Even after being made aware of my existence (not having a mailbox), I have not been included in any project-related decision making processes.

**Question:** What actions will be taken to acknowledge and remedy the project’s failure to follow community consultative principles (including now actively **consulting** the community)?

### 4. Decommissioning and Rehabilitation

I’m always skeptical that owners of energy projects will clean up after themselves. The Farm is projected to have a life of around 30 years then either be refreshed or decommissioned and the site rehabilitated. I have seen too many sites, mines especially, left to rot into the environment, or for taxpayers to clean up. Measures must be taken to ensure that the cleanup and rehabilitation will actually take place.

**Question:** How can this best be addressed? My proposed, perhaps overly-simplistic, solution would be to calculate the best-effort, inflation-included, cost of decommissioning and rehabilitation, and require that the operators transmit 1/20th of that amount each year for 20 years into a third party escrow account.

## Comments

To reiterate the failure of the “Community Consultation Principles”, I only discovered the existence of this project from a chance comment from a neighbour. I attended an information session in Armidale in August 2020 to learn more about this project and discovered that the entity running the project didn’t know about me because “my property doesn’t have a mailbox at the gate”. Given that we’re well into the 21st century this seems to me to be a low technology and fallible method of discovering properties.

[The majority of our correspondence, financial statement, newsletters, etc, is delivered as email these days thus no physical mailbox is required. Small packages are delivered to a PO Box for security purposes. Large packages are delivered to freight depots.]

**Recommendation:** Require entities to acquire locations of affected and interested parties by means other than the location of postal mailboxes at the roadside.

# Appendix

## Fauna

### Birds, including:

Butcherbird, Grey  
Chough, White-winged  
Cockatoo, Black, Yellow-tailed  
Currawong  
Dollarbird  
Ducks (various) [including Australian wood duck (Chenonetta jubata)]  
Eagle, Little (pair)  
Eagle, Wedge-tailed  
Fantail, Grey  
Finch, Red-browed (aka Firetail)  
Friarbird  
Hawks (various)  
Heron, Pacific  
Honeyeater, White-eared  
Honeyeater, Yellow-faced  
Ibis  
Kingfisher (maybe Sacred or Collared)  
Kite (of some variety)  
Kookaburra  
Magpie  
Magpie-lark  
Noisy Miner  
Owl, Australian boobok  
Owl, barking (double bark heard, owls not seen)  
Pardalote  
Parrot, King  
Pigeon (Crested?)  
Plover  
Raven/Crow  
Robin (red or scarlet? Or both)  
Rosella, Crimson  
Rosella, Eastern  
Satin Bowerbird  
Shrikethrush  
Spinebill, Eastern  
Swallow  
Swamp-hen, Australasian  
Tawny Frogmouth  
Tree creeper  
Willie Wagtail  
Wren, Blue Fairy

### Marsupials

Kangaroo, Eastern Grey  
Wallaby, Red-necked  
Wallaby, Swamp  
Walleroo, Eastern

Antechinus  
Glider, Feathertail  
Glider, Sugar  
Koala  
Possum  
Quoll

## Monotreme

Echidna

## Frogs (validated via FrogID project at UNSW)

Eastern sign-bearing froglet (*Crinia parinsignifera*)  
Common eastern froglet (*Crinia signifera*)  
Wallum froglet (*Crinia tinnula*)  
Eastern banjo frog (*Limnodynastes dumerilii*)  
Spotted marsh frog (*Limnodynastes tasmaniensis*)  
Bleating tree frog (*Litoria dentata*)  
Eastern dwarf tree frog (*Litoria fallax*)  
Broad-palmed frog (*Litoria latopalmata*)  
Peron's tree frog (*Litoria peronii*)  
Smooth toadlet (*Uperoleia laevis*)

## Other - native

Bats (micro)  
Dingo  
Dragon, Eastern bearded  
Dragon, Australian Water  
Emu (escaped pet?)  
Snakes, various including Brown and Red-bellied black  
Turtle, Snake-necked

## Flora

### Orchid

Caledonia sp., Lady's Fingers  
Dipodium sp., several species, up to ~300 seen in a good year  
Diuris sp. (several species), Donkey Orchids  
Eriochilus cucullatus, Parson's bands  
Glossodia major, Waxlip orchid  
Beard Orchid  
Pterystillis sp. (Greenhood), two species including midget greenhood  
Microtis sp. (perhaps unifolia or parviflora)

**Others, including:**

Goodenia sp. and related, several species

? Calotis cuneifolia (white/lilac burr daisy)

Nodding Blue Lily (Stypandra glauca)

Bulbine Lilies (Bulbine bulbosa)

Dianella caerulea (blue flax-lily, blueberry lily, or paroo lily)

Goodenia ovata

Fringe lily

Violet