

Department of Planning, Industry and Environment  
320 Pitt Street  
Sydney NSW 2000

Re: Submission Walla Walla Solar Farm (SSD-9874)

Dear Sir / Madam,

I wish to object to the proposed Walla Walla Solar Farm development primarily as it requires the use of large amounts of productive agricultural land in Greater Hume.

There is strong demand for agricultural properties in this region. Farmland prices are a function of many variables including, but not limited to rainfall, location, agricultural industry, productivity, land quality, sentiment, interest rates, commodity prices and the performance of the wider economy.

Agricultural enterprises in Greater Hume include beef cattle production (beef production, commercial and stud stock breeding), sheep (lamb production and growing wool), and the production of grain crops primarily wheat, oats, barley and canola.

The NSW Department of Primary Industries Mapping of Important Agricultural Land in the Riverina Murray Region is still unresolved. Greater Hume Council provided an extensive submission to the DPI. This submission demonstrated that the largest industry in the Shire is Agriculture, Forestry and Fishing with Output by Industry of \$325.3M *Source: Greater Hume Submission to Riverina Murray Important Agricultural Lands (IAL) Mapping Draft Exhibition (page 6)*

Greater Hume Council at its Ordinary Meeting on 20 Nov 2019 decided to formally object to the Walla Walla development for the following reasons:

1. Reduced Levels of Amenity for Nearby Residents
2. Social, Environmental and Economic Impacts
3. Loss of High Quality Agricultural Land
4. Impacts on Native Vegetation and Aboriginal Heritage

Greater Hume Council Endorsed Submission to the Environmental Impact Statement (EIS) – Walla Walla Solar Farm stated that:

*'Inspections by Council of the development site and adjacent land would indicate that it is high quality agricultural land. Council has been advised that this land will be mapped as important agricultural land under the Riverina Murray Draft Important Agricultural Land Mapping project which also indicates it is high quality agricultural land. Due to its impending status as important agricultural land, the site could be considered constrained under the Department of Planning, Industry and Environment's Large Solar Energy Guidelines.'*

I agree with Council's objection of the development and reasons. There are more suitable locations for such a large development. Not all land is equal in terms of reliable agricultural production, as illustrated in the current drought conditions. The location of transmission lines should not be the driving factor in the placement of large scale solar developments. More consideration needs to be given to the suitable placement of projects for renewable energy generation.

The NSW Right to Farm Policy published by the Department of Primary Industries in 2015 states that: *'The NSW Government recognises the value of agriculture for growing food and fibre for domestic and international markets and is concerned about the potential loss or impaired use of agricultural land.'* Solar Farms are a farm by name only, created for the purpose of marketing - a true farm is for primary production of agriculture.

This project is one of four proposed large-scale solar farms listed on the Department of Planning, Industry and Environment - Major Projects Register within the Greater Hume LGA – Jindera Solar Farm, Culcairn Solar Farm and Glenellen Solar Farm. These are all predominantly on agricultural land covering a total of 2630 hectares which is effectively being redirected from agricultural.

The local economic benefits to Walla Walla and surrounding Greater Hume during construction would be minimal as workers would likely be accommodated in larger areas. Resources are being redirected from one industry and replaced with another - not really providing a significant economic advantage.

Enterprises from agricultural pursuits year in year out support many local and regional businesses including but not limited to - Livestock carriers, Shearing Teams, Produce Stores, Wool Stores, Fuel Providers, Contactor sprayers, Contact harvesters, Contract fencers, Contact seeders, Contact Lamb and sheep husbandry businesses , Machinery dealerships, Metal fabrication businesses, Mechanics, Tyre Businesses, Earthmoving Businesses, Accountants, Legal Firms, Vets, Schools, Sporting clubs and local business.

The Project Benefit in the Executive Summary (page xx) states *'approximately 21 FTE operational staff for the life of the project'*. It's not till further in the EIS (page 46) that it states only 16 would be onsite. The Executive Summary is rather misleading when including the 5 FTE at head office. The EIS does not state the location of head office and its unlikely to be located in the local community.

The Executive Summary also states *'According to a confidential economic analysis for the proposal completed by Ernst and Young (2019), the estimated proportion that would provide a direct benefit to the Albury/Greater Hume economy is \$4.8 million per year.'* Why is this confidential? What is the percentage break up of direct value to Greater Hume?

Community engagement was poorly executed by Bison Energy. Our farm is less than 1km from the proposed site and it wasn't listed, it has 1.5 dwellings on it. We only heard about the project from people in our community, then we attended a community information session.

Community Open Day No. 1 was only held from 11-2pm during standard business hours making it hard to attend. The Walla Walla Community Feedback Form said '*What specific concerns do you have about the solar farm at Finley South?*'. There was also a question about reflecting local value and character. Some suggestions to achieve this on the form were '*A competition to design the signage*', '*Adopt a panel*' or a '*Viewing platform for the solar farm*' all of which I found to be undiplomatic and insensitive given the level of angst in the local community. This poor display of entry level paperwork prompted a level of distrust towards the accuracy of the data in the rest of project.

The EIS stated an internal road system off Benambra Road would be built for the construction phase and a maximum of 490 vehicle movements per day during the eight to twelve months of peak construction (page 174). It also stated water would be required for dust suppression and trucked in from Hurricane Hill Quarry (page 40). To access the Quarry for the stated 25,000 kl of water you would need to use Benamba Road, then Weeamera Road adding to an increase in traffic volumes. This increase of number of vehicles for this route is not stated.

As a regular user of Benembra Road, traffic volumes and noise is of a concern. It is noted from the EIS that:

*'The average daily traffic (adt) volumes recorded from 7:00am to 7:00pm Monday to Friday were 46 vehicles per day (vpd) on the eastern length of Benambra Road.'* (Page 149)

*'The increase in traffic and heavy vehicle movement during construction and decommission would result in a **minor** increase in noise as a result of the proposed works'* (Page 176). I fail to understand how the noise would be minor - 46 vehicles to 490 vehicles per day is a massive increase, many will be truck and dog trailers.

Michelle Pumpa