

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

Re: Submission Culcairn Solar Farm (SSD-10288)

Dear Sir / Madam,

I wish to object to the proposed Culcairn Solar Farm. The size of the development is extremely concerning on a personal level and as a member of the agricultural community. This area has a 600-800ml average rainfall and is capable of consistent primary production whilst other parts of the State are affected by drought and fire. Agricultural land is an important asset which we need to protect for the purpose of producing quality Australian food, fibre and fodder. Using productive agricultural land for large scale renewable energy developments is a misuse of land, given there are other less arable land options available.

This 1,317 ha site has the capability to produce one of the following:

Wheat	5,268 tonne
Bread	32,777,496 loaves
Lamb / Beef	131,700 kg
Wool	79,020 kg
Malting Barley	5,268 tonne
Beer	22,473,288 cans

The site selection for this proposal is based on cleared level land and availability to the transmission network because that is the cost effective option for the developer. Not all land is equal in terms of agricultural output. The location of transmission lines should not be the driving factor in the placement of large scale developments. More consideration needs to be given suitable placement of renewables in the energy mix.

There is strong demand for agricultural properties in the Greater Hume region. Farmland prices are a function of many variables including, but not limited to rainfall, location, productivity, land quality, sentiment, interest rates, commodity prices and the performance of the wider economy. *'In the Murray Region, rural land values had a strong overall increase of 20.4%. Strong increases were recorded in Murray River (11.9%), Federation (17.1%), Greater Hume (24.4%), Berrigan (28.0%) and Edward River (30.0%) local government areas'.*

Murray

Total land values for the Murray region

Property type	1 July 2017	1 July 2018	% change	Total properties in zone
Residential	\$4,922,799,788	\$5,147,415,500	4.6%	41,488
Commercial	\$371,916,110	\$382,607,190	2.9%	1,050
Industrial	\$238,309,370	\$243,758,420	2.3%	1,342
Rural	\$4,614,830,807	\$5,557,865,680	20.4%	10,425

Valuer General Report on NSW land values at 1 July 2018

Site Suitability

AEMO's Integrated System Plan identified the best locations for potential energy zones in NSW. Greater Hume was not in one of those areas. The map from Renewable Energy Resources of NSW depicts a solar reference point in Greater Hume of lower, average daily global solar exposure. The map indicates much larger areas to the North West of the State, have higher average daily global solar exposure.

The Riverina Murray Regional Plan 2036 states under the heading 'A Growing and Diverse Economy' - Direction 1: Protect the region's diverse and productive agricultural land. Under Direction 1, three actions are listed. The first, 1.1 being *'Develop a regional agricultural development strategy that: maps important agricultural land...'* p17.

Whilst the Draft Riverina Murray Important Agricultural Land Mapping is still being undertaken by the Department of Primary Industries, a project of this magnitude should not be considered on agricultural land.

Economic Impact Statement

The 'Study Area' in the Economic Impact Statement (Appendix O) has been defined as Greater Hume, Albury, Wodonga and Wagga Wagga and states that 'The major regional cities/townships of Albury, Wagga Wagga and Wodonga have the capacity and labour force to service many aspects of the Project' (p.i). The economic impacts will more directly benefit these major regional centers. Key services are listed for the towns above in Appendix O. In the analysis of Culcairn it's been overlooked that Culcairn has x2 fuel outlets, a bank, and Dr. and medical facilities, automotive services and engineering services.

Population statistics from developers Economic Impact Statement state the following. 'Of note is the static population forecast for Greater Hume Shire, with projections showing no population growth is forecast in the Shire over the period to 2036.' (Page 13)

Table 2.1: Population – Study Area, 2018-2036 (No. of Persons)

Municipality	2018	2036	Change 2018-36	AAGR 2018-36
Greater Hume Shire	10,690	10,640	-50	0.0%
Albury City Council	53,770	60,910	7,140	0.7%
Wagga Wagga City Council	64,820	75,450	10,630	0.8%
Wodonga City Council	41,430	49,170	7,740	1.0%
Study Area	170,710	196,170	25,460	0.8%
New South Wales	7,988,240	9,925,550	1,937,310	1.2%
Victoria	6,460,680	8,722,770	2,262,090	1.7%

Sources: ABS, 3218.0 *Regional Population Growth, Australia*; Department of Environment, Lands, Water and Planning – *Victoria in Future 2019*; Department of Environment and Planning – *NSW State and Local Government Population Projections 2016*

Notes: AAGR = Annual Average Growth Rate

The NSW Government document below clearly shows a growth in Greater Hume's population by 2036. The EIS suggests that growth in the Shire is stagnant and at a standstill.

Greater Hume Shire Council 2019 NSW Population Projections



Key Indicators: Projected Population, Households and Dwellings - all data at 30th June						
	2016	2021	2026	2031	2036	2041
Total Population	10,500	10,700	10,850	11,000	11,150	11,250
2016 Population Projection	10,250	10,350	10,350	10,300	10,200	
Total Households	4,100	4,250	4,400	4,550	4,600	4,700
Household Size*	2.52	2.47	2.42	2.37	2.37	2.33
Implied Dwelling Projection**	4,750	4,950	5,100	5,250	5,350	5,400

*Average persons resident per occupied private dwelling

**Dwellings required if the population forms households in the same ways as in 2016

Community Consultation

On the 27th Nov 18 we had a basic introductory meeting with Neoen, then our second meeting on 14th Oct 19. We had a meeting scheduled in April 19 but Neoen cancelled on the day. We did not receive an update about the scoping report as stated in the EIS '*... an update of the project was provided by email or post mail to neighbours within 3 km of the project site informing them that the Scoping report had been lodged to the Department of Planning and Environment of NSW.*' (Appendix C.3, p24). We sourced it ourselves from the website. We recently had a third, brief meeting on 30th Jan 20, the day before the EIS was placed on exhibition.

Community Relations Plan

We attended the Community Drop-in Session at Culcairn in May 19, which we did receive an email invitation. We obtained the majority of our information from this session and filled out a Feedback Form.

There was a vocal host land owner and vocal supporter who made it difficult to hear answers being given by Neoen. The session was held in ¼ of a large meeting room, the rest was sectioned off by light weight material partitions. If Neoen representatives were responsive and opened the whole room up for access, everyone would have been accommodated comfortably and I suspect the incident would not have occurred.

At the Drop-in Session a Neoen representative said to contact him at any time for more information, his words were - 'It might take me a few days, but I will get back to you'. I sent an email to him on 26th Jun 19 with questions from the Drop-in Brochures about visual impact, vegetation screening, fencing and panel height. I did not get a reply. I resent the email on 24 Sep 19. I still did not get a reply. The Community Relations Plans states on page 8 - '*We provide timely information and ensure people have time to digest information, understand the project and make informed decisions.*' Screen shot below.

From: Michelle Pumpa <mungurra@yahoo.com.au>
Sent: Tuesday, 24 September 2019, 12:13 PM
To: Antoine Lajouanie <antoine.lajouanie@neoen.com>
Subject: Fw: Culcairn solar farm drop-in session

Hi Antoine,

I have resent the email below with the questions from the Information Session that you were going to get back to me about.

Please disregard Question 4 as obviously the visual architect has been.

If you could get back to me by email that would be great.

Kind Regards Michelle

----- Forwarded message -----

From: Michelle Pumpa <mungurra@yahoo.com.au>
To: Antoine Lajouanie <antoine.lajouanie@neoen.com>
Sent: Tuesday, 25 June 2019, 11:10:19 am AEST
Subject: Re: Culcairn solar farm drop-in session

Hi Antoine,

I have some questions arising from the flyers that were available at the community information session in Culcairn.

They are in no particular order.

Intensive Engagement

'This phase of the community consultation was conceptualised as involving three stakeholder groups; immediate neighbours, the wider community, business community.' (Appendix C.3, p26) I did fill out the Feedback Form on the day of the Community Drop-In Session but we were not included in this second phase of community engagement. We were not advised by Neoen there were two local community consultants appointed or contacted by them for a 'Kitchen Table' conversation.

As adjoining landowners we have found communication to be perfunctory at best. We feel the focus has very much been on seeking the acceptance of the wider community rather than providing meaningful engagement with the immediate neighbours who will be directly affected. On 24th April 19, I contacted Neoen by email providing our contact details again and asked to be kept in the loop about any updates.

I would like to make reference to the Neoen objectives below (Appendix C.3, p11)

- *2. Keep the community and stakeholders informed about Culcairn Solar Farm through the provision of accurate, timely and factual project information.*
- *3. Identify and address community and stakeholder concerns and maintain transparency in the project design, implementation and ongoing operations.*
- *7. Develop long-term relationships and partnerships with community and stakeholders.*

It has not been communicated to us if / how our comments were effecting change. It would have been beneficial for all neighbours to be emailed something like '4.3 – Summary of Concerns and Responses by Theme' (Appendix C.3, p30)

Photomontages

At no point in this process did we receive the photomontages as stated in the EIS, p102. We are receivers R08, R33 and R34 and reading through the EIS is the first time we have seen these. The only photo received from Neoen was by email on 17 May 19, taken from the road entrance of R08 Cummings Road. The EIS states *'the photomontages were produced to facilitate discussion between the affected residents and the Proponent'*. (EIS, p102) This did not transpire.

Summary of Responses to fear of declining property values

'Independent studies into the potential impact of renewable energy project developments on property prices have been conducted by the NSW Valuer-General (2009) and Urbis (2016) which conclude that there is insufficient evidence to suggest that renewable energy projects can be linked to adverse impacts on property prices.' (Appendix C.3, p36)

This information in the EIS and the Community Information Booklet is misleading as these studies have been done on wind farms only.

Local opportunities for sheep grazing

'The majority of neighbours, regardless of their objection to the solar farm, were keen to take advantage of the potential for sheep grazing on the solar farm.' (Appendix C.3, p38)

I would like to make it known that as adjoining neighbours with a large sheep operation, my husband and I have never been approached or registered any interest in sheep grazing on the proposed site.

Community Benefit Sharing Program Components

The community is being offered \$150,000 annually through a Community Benefit Fund. Over the lifetime of the project this will total \$4,800,000 million. The offer is disproportionate to the people who will be affected most by the development, especially during construction stage of 16 to 18 months.

The Community Information Booklet (p9) is misleading as it depicts in a diagram that the community benefits are over the lifetime of the project. It does not state that neighbour payments are a 'one-off' or how the payments are calculated or allocated. It only states a range - with a discrepancy of \$100,000.

Traffic Impact Assessment

It is recommended in the Traffic Impact Assessment *'that Weeamera Road north of the quarry access be upgraded to have a light spray seal and a width of 6.0 Metres.'* (Appendix H, p3) This is not an adequate solution to the increased traffic volumes of 400 heavy and light vehicle movements per day.

If the Walla Walla and Culcairn Solar Farms are both approved, a maximum of 490 vehicle movements per day (Walla Site) in addition to 400 vehicle movements (Culcairn Site) for a construction period of 16 to 20 months will subject the same residents geographically, to the strain of construction with double impacts of noise, dust, traffic and disruption to humans and animals.

Socio-economic and Community

'Negative socio-economic impacts from the proposed development are considered to be minimal...' (EIS p, xxiii) Nothing about the scale of this development can be described as minimal. Consider the figures:

- 16 to 18 months of construction
- 7am to 7pm Mon-Fri , 7am to 1pm on Saturday
- 80,526 piles being driven or screwed into the ground for the Ideematec tracker
- 161,052 piles being driven or screwed into the ground for the NexTracker system
- 400 heavy and light vehicle movements per day passenger light vehicle / mini bus movements per day during the peak construction
- 1,100,000 panels
- 50 Battery Energy Storage Systems
- 65 to 75 containerised inverter/transformers spread across the site
- A substation and associated buildings

The mental and emotional angst this has had on our cohesive community is irreparable. This project is not for the betterment of the community, it's for the betterment of the developer.

Michelle Pumpa