

From: noreply@feedback.planningportal.nsw.gov.au
To: [DPE Energy and Resources Policy Mailbox](#)
Subject: Webform submission from: Revised Large-Scale Solar Energy Guidelines
Date: Thursday, 24 February 2022 1:41:33 PM
Attachments: [extension-of-dopies-rorters-charter---solar-farm-version.pdf](#)

Submitted on Thu, 24/02/2022 - 13:36

Submitted by: Anonymous

Submitted values are:

Submission Type

I am making a personal submission

Name

First name

Michael

Last name

Crawford

I would like my submission to remain confidential

No

Info

Email

[REDACTED]

Suburb/Town & Postcode

Boro 2622

Please provide your view on the project

I object to it

Submission file

[extension-of-dopies-rorters-charter---solar-farm-version.pdf](#)

Submission

Submission attached.

I agree to the above statement

Yes

This submission relates to the December 2021 *Draft Large-Scale Solar Energy Guideline* exhibited by the NSW Department of Planning, Industry and Environment (DoPIE).

With that document, DoPIE has maintained its consistent record of creative writing to facilitate and extend the rorters' charter, of which it is so proud.

DoPIE continues to find ways to eliminate any meaningful rights of, and protections for, local residents threatened by rent-extracting industrial structures (wind and solar) being speared into country NSW. It does so by defining away the harm done, while giving the rorters and their consultants the words and frameworks to regurgitate to DoPIE as incantations which will ensure acceptance of their destructive proposals – all phrased in a DoPIE-sanctioned manner which will portray the effect on neighbours as benign rather than the hideous nightmare it so often is.

I do advise the officials involved to clearly identify themselves in the credits for this creative writing, so that when the CCP is handing out awards for services to Chinese industry (assistance flogging solar panels and ancillary equipment) the CCP can give credit where it is due. And they may well be in the running for other CCP awards (if those are not first snaffled by the Minister or other NSW politicians).

Some years ago, I and others warned of the enormous threat created for the NSW electricity grid and NSW power supply through the continuous encouragement of rorting large-scale solar and wind industrial installations, and consequently for the NSW economy.

One might have expected that to be a very critical issue for a government department ostensibly tasked with planning developments in order to actually protect and serve the interests of the people of NSW. Unfortunately, as it turns out, through their actions, DoPIE officials have made it abundantly clear that protecting the interests of NSW citizens is secondary to serving the interests of rent-seeking rorters and any political associates aligned with them. That also turns out to very conveniently, and undoubtedly fortuitously, serve the interests of the CCP.

It may have escaped the notice of the DoPIE officials who have been so busy with the many pieces of creative writing which comprise the rorters' charter, but the CCP has an intense interest in eventually subjugating Australia, ideally without a nasty war in which we can resist very much.

In pursuit of that CCP strategy, it is so convenient if Australia heavily degrades its industrial and economic capacity – and what better way to do that than replacing the strong, low-cost and robust electricity generation and distribution system which the country once had, and which underpinned manufacturing, with a basket case power system cobbled together from intermittent, unreliable power sources (particularly solar, which this DoPIE document champions, and wind) and whose addition to our grid degrades the grid like sand in the gears of a car, increases its chance of failure and makes it less able to sustain industry.

I am not sure which category of awards the CCP has for foreigners assisting its strategic plans for subjugating Australia but the DoPIE authors of this NSW Government policy document are no doubt in the running for at the very least an honourable mention. So, make sure your names are clear.

Alternatively, you could serve the actual interests of NSW citizens by scrapping the reference document and replacing with a policy which prohibits large-scale solar (and wind) industrial facilities. Sadly, in that case, you would not be in the running for any CCP awards – but other

Australians have borne greater burdens, and given their lives, in the interest of the country and NSW.

Dr Michael Crawford

From: noreply@feedback.planningportal.nsw.gov.au
Sent: Thursday, 10 February 2022 11:45 AM
To: DPE Energy and Resources Policy Mailbox
Subject: Webform submission from: Revised Large-Scale Solar Energy Guidelines

Follow Up Flag: Follow up
Flag Status: Flagged

Submitted on Thu, 10/02/2022 - 11:44

Submitted by: Anonymous

Submitted values are:

Submission Type

I am making a personal submission

Name

First name

Dale

Last name

Curtis

I would like my submission to remain confidential

No

Info

Email

Suburb/Town & Postcode

Armidale 2350

Please provide your view on the project

I am just providing comments

Submission

To Matthew Riley, Director – Energy and Resources Policy,

Thank you for the opportunity to provide feedback on the NSW Government's draft large-scale solar guidelines. I support the guidelines with some improvements that relate to local community needs around solar projects, outlined below.

Land Use

It's critical to balance the needs of food production and biodiversity protection, with the need for clean, cheap energy and with the benefits that large scale renewables bring to host landholders and regional communities.

Where high-value agricultural land is used by solar developers, the project should always be designed for dual use, enabling farming to continue under panels. For example, offering agistment for sheep grazing, horticulture or growing pollinator habitat(p 35).

While the guidelines should protect the utility of high-value agricultural land, solar farms should be planned on cleared sites and avoid clearing remnant or high-value vegetation, where possible. The guidelines should protect against land clearing for solar

developments, which will be opposed by environmental groups and local communities.

Community consultation including community mapping to identify sites of high agricultural, environmental or cultural value is key to identifying local perceptions of the agricultural value of the land, in combination with traditional measures of agricultural value. (p 2 Appendix B)

First Nations

The Guidelines must uphold best-practice engagement and benefit-sharing with First Nations peoples, to ensure proponents embody the principles of free, prior and informed consent of Traditional Owners.

Appropriate care and consultation must be taken with local First Nations groups and restrictions placed on renewable energy developments impacting First Nations cultural heritage.

Representative local First Nations Working Groups are creating general and region-specific engagement and benefit guidelines for NSW Renewable Energy Zones. These should be utilised by all developers, including those outside of designated REZs.

Neighbours

All levels of Agricultural Impact Assessments should include consultation with neighbours of host landholders as a minimum. (p 6-8 Appendix B)

The Guidelines recommend assessing impacts on neighbour properties, however, the impact of insurance on neighbours should be identified in all Levels of Assessment. An outline of how an increase in premiums will be mitigated by the proponent should be included in the assessment.

Visual Impact Mitigation

RE-Alliance notes the mitigation measures provided for proposals with moderate or high visual impacts on pages 14-15 of Appendix A. We support options such as:

- Re-siting or removing arrays
- Re-sizing
- Vegetation screening
- At-source mitigation and
- Negotiated agreements

With regards to vegetation screening, we agree that vegetation screening can take many years to establish and during drought conditions may not achieve optimal growth or have the desired screening effect. We support the use of appropriate plant species that are suited to the environmental conditions (for example, drought-tolerant native species if relevant), sufficient irrigation (e.g. six months) and if possible, of suitable maturity to provide maximum screening effectiveness in the shortest possible time.

Community Enhancement Funds (CEFs)

Community benefit programs should prioritise locally impacted communities in the sharing of benefits from renewable energy projects (p.37). All benefit-sharing programs should be co-designed with the local community to ensure real benefit.

Solar projects should consider three different levels of benefits: neighbour benefits for directly impacted neighbouring properties; local benefits for the town most impacted by the project, and; regional benefits for the broader region hosting the project

Community representation, including representatives from highly impacted areas, should be mandatory on committees for decision making on how CEFs are spent, no matter who is responsible for administering funds.

Voluntary Planning Agreements (VPAs)

VPAs through Councils are not the preferred mechanism to administer CEFs (p 37). CEFs should be separate from VPAs.

While VPAs should be separate from CEFs, there should also be community representatives included in early VPA negotiations between developers and Councils.

Other Types of Community Benefits

There are many types of community benefit programs beyond CEFs and VPAs. These include: local decision-making, in-kind contributions, regional enhancement funds, empowerment of First Nations communities, neighbour benefits schemes, community co-investment and co-ownership, tourism and education programs, local jobs and procurement.

Ideas and Australian examples of benefits can be found in RE-Alliance's Community Benefits Handbook: www.re-alliance.org.au/community_benefits_handbook

Local Engagement

Project proponents and government need to consider the issues of consultation burden which is already being felt in REZs.

Communities need to be valued for the time they are required to put towards contributing to various consultations, Information Days, surveys and CCCs.

Part of early benefit-sharing arrangements could include providing a fund to cover the costs of people's time when they attend particular consultation sessions.

I agree to the above statement

Yes

From: noreply@feedback.planningportal.nsw.gov.au
To: [DPE Energy and Resources Policy Mailbox](#)
Subject: Webform submission from: Revised Large-Scale Solar Energy Guidelines
Date: Thursday, 10 February 2022 12:46:09 PM

Submitted on Thu, 10/02/2022 - 12:45

Submitted by: Anonymous

Submitted values are:

Submission Type

I am making a personal submission

Name

First name

Simon

Last name

Wright

I would like my submission to remain confidential

No

Info

Email

[REDACTED]

Suburb/Town & Postcode

ORANGE 2800

Please provide your view on the project

I support it

Submission

To Matthew Riley, Director – Energy and Resources Policy,

Thank you for the opportunity to provide feedback on the NSW Government's draft large-scale solar guidelines. I support the guidelines with some improvements that relate to local community needs around solar projects, outlined below.

Land Use

It's critical to balance the needs of food production and biodiversity protection, with the need for clean, cheap energy and with the benefits that large scale renewables bring to host landholders and regional communities.

Where high-value agricultural land is used by solar developers, the project should always be designed for dual use, enabling farming to continue under panels. For example, offering agistment for sheep grazing, horticulture or growing pollinator habitat (p 35).

While the guidelines should protect the utility of high-value agricultural land, solar farms should be planned on cleared sites and avoid clearing remnant or high-value vegetation, where possible. The guidelines should protect against land clearing for solar developments, which will be opposed by environmental groups and local communities.

Community consultation including community mapping to identify sites of high agricultural, environmental or cultural value is key to identifying local perceptions of the agricultural value of the land, in combination with traditional measures of agricultural value. (p 2 Appendix B)

First Nations

The Guidelines must uphold best-practice engagement and benefit-sharing with First Nations peoples, to ensure proponents embody the principles of free, prior and informed consent of Traditional Owners.

Appropriate care and consultation must be taken with local First Nations groups and restrictions placed on renewable energy developments impacting First Nations cultural heritage.

Representative local First Nations Working Groups are creating general and region-specific engagement and benefit guidelines for NSW Renewable Energy Zones. These should be utilised by all developers, including those outside of designated REZs.

Neighbours

All levels of Agricultural Impact Assessments should include consultation with neighbours of host landholders as a minimum. (p 6-8 Appendix B)

The Guidelines recommend assessing impacts on neighbour properties, however, the impact of insurance on neighbours should be identified in all Levels of Assessment. An outline of how an increase in premiums will be mitigated by the proponent should be included in the assessment.

Visual Impact Mitigation

RE-Alliance notes the mitigation measures provided for proposals with moderate or high visual impacts on pages 14-15 of Appendix A. We support options such as:

Re-siting or removing arrays

Re-sizing
Vegetation screening
At-source mitigation and
Negotiated agreements

With regards to vegetation screening, we agree that vegetation screening can take many years to establish and during drought conditions may not achieve optimal growth or have the desired screening effect. We support the use of appropriate plant species that are suited to the environmental conditions (for example, drought-tolerant native species if relevant), sufficient irrigation (e.g. six months) and if possible, of suitable maturity to provide maximum screening effectiveness in the shortest possible time.

Community Enhancement Funds (CEFs)

Community benefit programs should prioritise locally impacted communities in the sharing of benefits from renewable energy projects (p.37). All benefit-sharing programs should be co-designed with the local community to ensure real benefit.

Solar projects should consider three different levels of benefits: neighbour benefits for directly impacted neighbouring properties; local benefits for the town most impacted by the project, and; regional benefits for the broader region hosting the project

Community representation, including representatives from highly impacted areas, should be mandatory on committees for decision making on how CEFs are spent, no matter who is responsible for administering funds.

Voluntary Planning Agreements (VPAs)

VPAs through Councils are not the preferred mechanism to administer CEFs (p.37). CEFs should be separate from VPAs.

While VPAs should be separate from CEFs, there should also be community representatives included in early VPA negotiations between developers and Councils.

Other Types of Community Benefits

There are many types of community benefit programs beyond CEFs and VPAs. These include: local decision-making, in-kind contributions, regional enhancement funds, empowerment of First Nations communities, neighbour benefits schemes, community co-investment and co-ownership, tourism and education programs, local jobs and procurement.

Ideas and Australian examples of benefits can be found in RE-Alliance's Community Benefits Handbook: www.re-alliance.org.au/community_benefits_handbook

Local Engagement

Project proponents and government need to consider the issues of consultation burden which is already being felt in REZs.

Communities need to be valued for the time they are required to put towards contributing to various consultations, Information Days, surveys and CCCs.

Part of early benefit-sharing arrangements could include providing a fund to cover the costs of people's time when they attend particular consultation sessions.

I agree to the above statement

Yes

From: noreply@feedback.planningportal.nsw.gov.au
Sent: Thursday, 10 February 2022 7:16 PM
To: DPE Energy and Resources Policy Mailbox
Subject: Webform submission from: Revised Large-Scale Solar Energy Guidelines

Follow Up Flag: Follow up
Flag Status: Completed

Submitted on Thu, 10/02/2022 - 19:16

Submitted by: Anonymous

Submitted values are:

Submission Type
I am making a personal submission

Name

First name
Sharon

Last name
Nott

I would like my submission to remain confidential
No

Info

Email

Suburb/Town & Postcode
Dunedoo

Please provide your view on the project
I am just providing comments

Submission
To Matthew Riley, Director – Energy and Resources Policy,

Thank you for the opportunity to provide feedback on the NSW Government's draft large-scale solar guidelines. I support the guidelines with some improvements that relate to local community needs around solar projects, outlined below.

Land Use

It's critical to balance the needs of food production and biodiversity protection, with the need for clean, cheap energy and with the benefits that large scale renewables bring to host landholders and regional communities.

Where high-value agricultural land is used by solar developers, the project should always be designed for dual use, enabling farming to continue under panels. For example, offering agistment for sheep grazing, horticulture or growing pollinator habitat(p 35).

While the guidelines should protect the utility of high-value agricultural land, solar farms should be planned on cleared sites and avoid clearing remnant or high-value vegetation, where possible. The guidelines should protect against land clearing for solar

developments, which will be opposed by environmental groups and local communities.

Community consultation including community mapping to identify sites of high agricultural, environmental or cultural value is key to identifying local perceptions of the agricultural value of the land, in combination with traditional measures of agricultural value. (p 2 Appendix B)

First Nations

The Guidelines must uphold best-practice engagement and benefit-sharing with First Nations peoples, to ensure proponents embody the principles of free, prior and informed consent of Traditional Owners.

Appropriate care and consultation must be taken with local First Nations groups and restrictions placed on renewable energy developments impacting First Nations cultural heritage.

Representative local First Nations Working Groups are creating general and region-specific engagement and benefit guidelines for NSW Renewable Energy Zones. These should be utilised by all developers, including those outside of designated REZs.

Neighbours

All levels of Agricultural Impact Assessments should include consultation with neighbours of host landholders as a minimum. (p 6-8 Appendix B)

The Guidelines recommend assessing impacts on neighbour properties, however, the impact of insurance on neighbours should be identified in all Levels of Assessment. An outline of how an increase in premiums will be mitigated by the proponent should be included in the assessment.

Visual Impact Mitigation

RE-Alliance notes the mitigation measures provided for proposals with moderate or high visual impacts on pages 14-15 of Appendix A. We support options such as:

- Re-siting or removing arrays
- Re-sizing
- Vegetation screening
- At-source mitigation and
- Negotiated agreements

With regards to vegetation screening, we agree that vegetation screening can take many years to establish and during drought conditions may not achieve optimal growth or have the desired screening effect. We support the use of appropriate plant species that are suited to the environmental conditions (for example, drought-tolerant native species if relevant), sufficient irrigation (e.g. six months) and if possible, of suitable maturity to provide maximum screening effectiveness in the shortest possible time.

Community Enhancement Funds (CEFs)

Community benefit programs should prioritise locally impacted communities in the sharing of benefits from renewable energy projects (p.37). All benefit-sharing programs should be co-designed with the local community to ensure real benefit.

Solar projects should consider three different levels of benefits: neighbour benefits for directly impacted neighbouring properties; local benefits for the town most impacted by the project, and; regional benefits for the broader region hosting the project

Community representation, including representatives from highly impacted areas, should be mandatory on committees for decision making on how CEFs are spent, no matter who is responsible for administering funds.

Voluntary Planning Agreements (VPAs)

VPAs through Councils are not the preferred mechanism to administer CEFs (p 37). CEFs should be separate from VPAs.

While VPAs should be separate from CEFs, there should also be community representatives included in early VPA negotiations between developers and Councils.

Other Types of Community Benefits

There are many types of community benefit programs beyond CEFs and VPAs. These include: local decision-making, in-kind contributions, regional enhancement funds, empowerment of First Nations communities, neighbour benefits schemes, community co-investment and co-ownership, tourism and education programs, local jobs and procurement.

Ideas and Australian examples of benefits can be found in RE-Alliance's Community Benefits Handbook: www.re-alliance.org.au/community_benefits_handbook

Local Engagement

Project proponents and government need to consider the issues of consultation burden which is already being felt in REZs.

Communities need to be valued for the time they are required to put towards contributing to various consultations, Information Days, surveys and CCCs.

Part of early benefit-sharing arrangements could include providing a fund to cover the costs of people's time when they attend particular consultation sessions.

I agree to the above statement

Yes

Draft Large-Scale Solar Energy Guideline.

Ms Felicity Greenway

Executive Director, State Policy and Strategic Advice

Dear Felicity,

My silence over the last few years does not denote my lack of interest. I remember vividly our meeting in Queanbeyan on July 24, 2016 when I and two other noisy Jupiter people were treated to a very selective presentation on the draft wind farm Visual Assessment Bulletin.

I welcome the opportunity to document a few of the flaws in this solar equivalent.

Whilst there is more realism in this document eg. vegetation mitigation will most likely destroy the view, these improvements are balanced by what has been left in and additions. eg. Non vegetative mitigation – build a shed between you and the solar farm.

This Guideline differs from its solar predecessor in a few major areas, the most obvious of which is Visual Impacts. In the current Large-Scale Solar Energy Guideline (2018), Visual Impacts are included as one short sentence in the section “other issues that may be relevant”

In this current draft we have well over 20 pages devoted to the topic.

I would therefore like to concentrate on the “Visual Amenity Impacts” of these draft Guidelines. I’ll leave it to others to highlight other flaws such as the looming operational waste issue where, over the operational life of the solar farm, in addition to decommissioning, most panels are likely to be replaced at least once

I assume that major contributions to Section 5.1 and Appendix A came from the O’Hanlon group and Scenic Spectrums, otherwise you have serious plagiarism and copyright issues. For the benefit of other readers, these two organisations provided significant input to the deeply flawed, but award winning¹, wind farm equivalent.

Unquestionably, visual impacts could be influenced by good site selection. However, let us not delude ourselves. The site chosen for a solar farm will depend on:

- proximity to the grid
- gullible hosts
- whether the site is in, or not in, a REZ
- the site topography or orientation

and so forth.

Very low on the list of dependencies will be the visual amenity principles stated on Page 31:

- to minimise impacts and conflicts **where possible**
- to avoid high levels of visual impacts **as far as practicable**

(my bolding to emphasise, once again, the low hurdles DPIE sets for renewables developers)

I do love the **high impact** “photomontage” on Page 32. You do not need a VI expert nor an assessment methodology to come to this High visual impact rating when your

¹ <https://www.planning.nsw.gov.au/News/2017/And-the-award-goes-to>

residence has horizon to horizon views of the solar farm and is 100 metres from and 60 metres above the nearest panels.

But, onto Appendix A.

The assumption is that every solar EIS will show examples of non-associated viewpoints that have visual impacts ranging from very low to moderate (the only effective mitigation strategy for the example on Page 32 is the purchase of the property by the proponent).

I assume that the authors, both external and departmental have “Ground truthed” Appendix A, section 3.2 on a number of properties visually impacted by existing solar farms.

Not having a local large scale solar farm, I’ve adopted a practical example to determine the effectiveness of the Assessment Framework by analysing the impacts from a residence on our Roseview Rd escarpment where we replace the defunct Jupiter wind farm (closest turbine 2550 metres) with the mythical Jupiter solar farm at, let us assume, 1500 metres.

The residence is 70 metres above the mythical Jupiter solar farm and has been visited by Secretary McNally, Mike Young, David Kitto and, I believe, Nicole Brewer, Terry O’Hanlon and others.

From Figure 2, The Preliminary Assessment Tool, the residence is below the line and a detailed Assessment is required. A good start.

From Figure 4, this viewpoint falls into Zone 5.

Assuming a range of visible sectors of 3 or 4, from the Visual Magnitude Matrix on Page 9 of the Appendix, the visual magnitude is low or very low.

The viewer sensitivity from a rural dwelling is Moderate. (I can imagine some creative VI expert claiming Low viewer sensitivity under your guidance given the claim that many solar farms would be in landscapes of low scenic quality)

Using the above factors, the **Visual Impact** from the Table 4 Matrix on Page 12 is **LOW**

Some years ago, when the wind farm equivalent of this document was on exhibition, we pointed out, for the same residence, that you ultimately arrived at a recommendation to “consider screening”

For the “Jupiter solar farm” for this residence, the recommendation from Table 6, Visual performance objectives is:

“Consider visual screening in consultation with affected landholders or project landscaping to reduce impacts.”

We laughed then, we laugh now.

What is missing

1. Voluntary Acquisition.

The ultimate mitigation strategy is voluntary acquisition. Negotiated Agreements as defined in this draft do not imply that this option is available (as it is in the wind equivalent - Page 26 – “voluntary acquisition for significantly affected landholders noting

that such a condition would provide for voluntary acquisition only at the request of the affected landowner”)

Residences suffering HIGH VI (High Visual Magnitude/Moderate Sensitivity) should have this option.

Consider the second High Visual Magnitude example on page 16 of the Appendix, where the non-associated residence is 60 metres above the nearest panel, 100 metres away. Firstly, I can't think of an example from my rural experience, nor from the many solar Scoping reports /EISs I have scanned. I would claim that this configuration is an impossibility for two adjoining rural properties, one of which hosts a solar farm. However, assuming such a combination exists, there are two mitigation strategies: voluntary acquisition, or DA rejection due to proponent siting stupidity.

2. Cumulative Visual Impacts

The current Solar Guidelines (2018) state, on the subject of cumulative impacts:

“Any cumulative impacts from any other developments (proposed, approved and operating), especially biodiversity, **visual impacts**, socio-economic and construction traffic impacts. For example, multiple solar developments in close proximity to each other may have a cumulative impact on other rural industries or adjacent land uses, amenity, biodiversity, visual effects or scenic landscapes.”

These current draft guidelines, say exactly the same for these two sentences except the words I have bolded, **visual impacts**, have been omitted. This is to be expected, given the 20+ pages added on VI. But cumulative visual impacts do not get a mention in the new draft VI sections or the Appendix. Given that in the intervening 4 years developers have placed much more emphasis on solar rather than wind in NSW and given the REZ strategy and your advice that “Large-scale solar energy developments should be prioritised within REZs² where possible”, the potential for rural viewpoints being impacted by multiple solar farms is to be expected. I know that destroys the visible sectors logic, but so be it.

3. Impacted land

Once again, the Department wants us to believe that only rural properties with residences are impacted visually. As DPIE executives are clearly aware and as documented to the Jupiter community in writing by then Planning Secretary McNally, impacts on land, especially land with residential rights, must be evaluated. Whether a dwelling exists is irrelevant. Developers won't do that unless you tell them to.

etc

Questions that need answering

- Which independent community bodies or individuals were given the opportunity to comment on the draft VI sections before exhibition?

² Developers may well prefer to build outside REZs. Time will tell, especially when we get to New England..

- Which developers or their lobbyists were given that opportunity?
- Did their input have any influence on the version on exhibition? Care to share the details?

Re the detailed visual assessment, Appendix Section 3.2:

- who are the authors of this section?
- Have they (or their companies) been paid consultancy fees by the department on previous occasions?
- which sections are they responsible for? (on the topic of viewer sensitivity there would appear to be a considerable variance between Mr Dennis Williamson's³ published work on the topic [2017] and this Guideline so it would be nice to be able to assign responsibility for the various topics)
- On which peer reviewed studies was this section based?
- Which external independent experts peer reviewed this section? Please publish the peer review.
- Why 5 zones?
- Could you please share the justification of the start distances of each zone, the slopes of the zone lines and the areas of each zone?
- Why are the zone deliniation lines straight?
- Why six sectors (5 makes more sense)?
- can you provide an example of a rural residence that has views of 6 sectors of any solar farm?
- The visual magnitude in Visual Magnitude Tool 3 is the same for 2 and 3 sectors across all zones. Can't be right can it?
- Classing a rural dwelling as having a viewer sensitivity⁴ of "Moderate" is nonsense but not new. There is no precedent apart from the NSW Wind Energy Visual Assessment Bulletin Dec 2016 (same authors?). Before then, most VI experts, eg Cloustone and Green Bean Design (GBD) rated it as "high" or "the highest". What has happened since? GBD, for example, has predictably decided that the experts at the department must be right (and it makes the VI result more developer friendly). Please justify?
- Do you agree that the more creative proponents will use your scenic quality guidance and lower the rural dwelling sensitivity to LOW?
- Rhetorically, why do you accept skewed scales? As an example, in Table 4. Visual Impact Matrix, both scales are skewed with one option (High) above the Moderate option and 2 below, The net effect is to elicit the possibility of 3 pro-community options (High) versus 13 pro-developer options (Moderate or less). I think I've answered my question.

Additionally, why conclude that:

"Professional assessment skills are critical to an effective visual assessment."

I know that some experts will feel that they have been cut out of the process, but you've told us how to do it.

It is also unnecessary to add:

"Experts should follow the guidance in this document in order to perform an effective visual assessment for a solar energy project."

³ On the assumption that Mr Williamson's company Scenic Spectrums is involved.

⁴ There is some confusion as to whether sensitivity applies to the viewer or the view

Believe me, as with the award winning wind farm VI bulletin before this, they will follow it and quote it all back to you.

As expected, the aim is to arrive at a moderate or lower VI, even if that rating is patently absurd. So for any rural residence in zone 3 (average), 3 or 4 sectors (average) Moderate sensitivity, you end up with, you guessed it, moderate VI.

I look forward to the CEC submission. They will love these Guidelines. Notice the lack of activity on the NET by the usual suspects.

Most solar DAs will be decided by the Department, now that it requires 50 objections to take it to the IPC. One day someone will take the Department to the LEC. You can't say you were unaware of the developer bias in this document and that's just the VI sections.

Best Regards
Anthony Gardner

From: noreply@feedback.planningportal.nsw.gov.au
Sent: Tuesday, 15 February 2022 3:19 PM
To: DPE Energy and Resources Policy Mailbox
Subject: Webform submission from: Revised Large-Scale Solar Energy Guidelines

Follow Up Flag: Follow up
Flag Status: Flagged

Submitted on Tue, 15/02/2022 - 15:19

Submitted by: Anonymous

Submitted values are:

Submission Type

I am making a personal submission

Name

First name

Stephen

Last name

Grimes

I would like my submission to remain confidential

No

Info

Email

Suburb/Town & Postcode

Lower Southgate

Please provide your view on the project

I am just providing comments

Submission

I would like to make a submission re guidelines policy.

I would like to point out two areas of interest that have not been properly considered in my opinion and your revision could consider them in better detail.

First the proponents whenever the visual amenity is mentioned they always give vague answers re planting natural screens such as trees, shrubs and the like to camouflage or hide the industrial visual aspect. This itself can have many problems such as poor soils and growing times to give adequate screening could take forever, also things like less than normal rainfall or even drought conditions the plants would suffer or even die and the screening would then be ineffectual for quite some time until they pick up or were replaced. There are many other reasons such as pests and wild animals etc that would render their solution to hide the project a disappointment or even a no show. (Screenings should be guaranteed to be in place and established doing its job, within a set and stated time/date, with ongoing monitoring as time goes by).

Second this screening is said to take place on a set back area from the immediate and adjacent neighbours, this set back does not appear to be any particular set width, they claim to do each according to the site-specific situation. However, they have been building these plants all over the place and surely there is enough information out there to set a nominated minimum datum width or set back to the equipment, one that takes into account all aspects visual, noise, lights, dust etc how come there is no uniform distance set from say a dwelling or a neighbour's property boundary from get go?

They claim not to minimise their impact on the local communities yet because there is very poor considerations to this simple

matter they get bolder and encroach into areas where these industrial plants should not be considered if say land somewhere between 500mtr – 1000mtr set back was in place, this suggestion is not an unreasonable distance to place between an industrial plant from residences or natural reserves, water ways etc then they would be forced to do the right thing and look at better suited sites which do not impose themselves on residents, communities or places of venerable treasured natural eco systems and the like.

I agree to the above statement

Yes

From: [REDACTED]
To: [DPE Energy and Resources Policy Mailbox](#)
Subject: Re: Missing Attachment RE: Webform submission from: Revised Large-Scale Solar Energy Guidelines
Date: Monday, 28 February 2022 12:41:51 PM
Attachments: [Drayton Submission.docx](#)

Hello,
Thankyou for getting back to me.
My Submission is attached. Below is my Cover letter

As I wrote my letter, I realised that these problems with the planning guidelines goes well beyond one submission.

We are being impacted by a Large Scale Solar Development Application right next door. For months now I have been reading every Large Scale Solar Scoping Report & EIS for the last three years.

Through the NSW Planning process the approved developments are only slightly modified until approval.

There isn't strong enough rules to protect us impacted farmers and neighboring land owners. Why in some critical locations are they not stopped at the very beginning. Why have I had to spend months out of my life researching, learning, understanding all these terms trying to stop a development just because my next door neighbor invited them in and wants to lease his land out for the next 30 years and move to town. Then the developer has the project approved, on sells this to the highest, usually an overseas bidder. All my current problems are brought on by personal monetary gain and the lack of planning protection.

I live and work on my farm on a full time basis, if the development is approved it will be a nightmare come true. As I have said, I live and love my farm , but to go out and work my paddocks with an industrial generation development over the side fence every day, well there will be no break from it for me for the rest of my life.

These developments, the scale of the developments, planning hasn't kept up the the hundreds of Large Scale Solar applications.

This is a extremely important matter to the whole farming community of NSW, affecting thousands of people and billions of dollars worth of properties.

Thank you, could you please take the time to read this,

Kind Regards,

Peter Drayton
Grafton NSW

----- Original Message -----

From: "DPE Energy and Resources Policy Mailbox"

<energy.resourcespolicy@dpie.nsw.gov.au>

To: [REDACTED]

Sent: Monday, 28 Feb, 2022 At 12:13 PM

Subject: RE: Webform submission from: Revised Large-Scale Solar Energy Guidelines

Hi Peter,

Thank you for your feedback.

The comments you have provided indicate that there may be an attachment which supports your submission. If this is the case, and as we did not receive any attachment with your original submission, it would be appreciated if you could please re-provide any supporting documentation at your earliest convenience.

Kind regards, Ashlee

Ashlee Adams
Planning Policy Officer, Energy and Resources Policy

Planning and Assessment | Department of Planning and Environment
T 02 9995 6435 | E ashlee.adams@dpie.nsw.gov.au
4 Parramatta Square, 12 Darcy St, Parramatta, NSW 2150
www.dpie.nsw.gov.au | [NSW Planning Portal](#)



The Department of Planning and Environment acknowledges that it stands on Country which always was and always will be Aboriginal land. We acknowledge the Traditional Custodians of the land and waters, and we show our respect for elders past, present and emerging. We are committed to providing places in which Aboriginal people are included socially, culturally and economically through thoughtful and collaborative approaches to our work.

From: noreply@feedback.planningportal.nsw.gov.au
<noreply@feedback.planningportal.nsw.gov.au>
Sent: Wednesday, 16 February 2022 2:31 PM
To: DPE Energy and Resources Policy Mailbox
<energy.resourcespolicy@dpie.nsw.gov.au>
Subject: Webform submission from: Revised Large-Scale Solar Energy Guidelines

Submitted on Wed, 16/02/2022 - 14:30

Submitted by: Anonymous

Submitted values are:

Submission Type

I am making a personal submission

Name

First name

Peter

Last name

Drayton

I would like my submission to remain confidential

No

Info

Email

[REDACTED]

Suburb/Town & Postcode

Grafton

Please provide your view on the project

I am just providing comments

Submission

Hi,

I wrote the submission from the view of a impacted farmer. I live and work on the property on a full time basis. If our project next door to us finally goes through the process and is approved & constructed it will be a nightmare coming true.

As I have said I live and love my farm, but going out and working in my paddocks every day, well there will be no break from it ,for the rest of my life.

It is that serious of a matter.

Please take the time to read my submission.

Thank you in advance if some changes are made.

Kind Regards,

Peter Drayton

I agree to the above statement

Yes

Submission : Re Revised Large-Scale Solar Energy Guidelines.

Peter Drayton



16th February 2022

Dear Sir, Madam,

I want to make a submission in regards to the Revised Large-Scale Solar Energy Guidelines that is on Exhibition at the moment.

We have a Large Scale Solar Development thrust upon us since our next door neighbour invited Solar Developers onto his property. They have completed their Scoping Report and NSW Planning have issued the SEARs [Clarence Valley Solar]

Since we were notified by letter drop, I have researched and read every Large Scale Solar EIS listed for last three years. I am a frequent user of the NSW Planning Portal, I have read every relevant guideline that NSW Planning has available and published on their site.

My Submissions are :

- Nowhere have I read in any article/ guideline/ or pub test, which really focuses in the early stages, of neighbouring property owner's thoughts, feelings or personal views in regards to the Lodged Development Application.
- The Application just proceeds though with a letter drop and with the developers following NSW Planning Guidelines. The whole process and the Guidelines are skewed in favour of the developers. A Scoping Report is lodged and a SEARs is issued. All without having one community meeting.
- Where is there any protection for the neighbouring residences, land owners and farmers?
- The Guideline states in the Visual Assessment that distances and views are from the residence and not from the property boundary. This is incorrect.
How do I farm my whole property when on one boundary is a 1000m length of Industrial Scale Solar Development. I have to tell you, that this is one of my most depressing thoughts.
- How will a 20m wide tree screen be acceptable when I have had Farmland & Clarence River views for the last twenty years? A tree lined screen is not a buffer zone. We all have plenty of trees in our chosen areas.
- Where in the Guideline does it take into consideration the dollar value of the area and farmland being developed?

- Where is there any mention in the Guidelines of the Subdivisional Potential of all neighbouring land? As in my case, 40 Ha Lots and the effects of a large scale industrial site over the fence.
- Why is there no fixed, listed buffer zone distances, from the boundary for all Large Scale Solar Developments as they are all basically the same layout. This would save time and argument in the Scoping Stage.
- Where is there a guideline that takes into consideration that the development application is in a drought proof area. I understand that there are soil assessment's completed in the EIS. Improving the soil with liming, fertilisers and seed plus reliable rainfall and this is a whole new situation.
- Why in the Guidelines isn't there a "Complete Section" written in regards to us, the affected people and not the developers.
- Imagine in the early stages of Scoping/Desk Top studies that in NSW Planning Guidelines, was a clause protecting the closest adjoining properties stating that if the Development Application was located in a small farming, high rainfall, and exceedingly valuable land area that it could not proceed.
- There should be Guidelines in place that if the Development Application Site isn't large enough in area, the buffer zone distances not capable of being met, and that there are close neighbours affected. Then development should not proceed, tree lined buffer zones or not. If the landscape is cleared farmland it should not be altered by the applicant.
- What if the developers were invited into a small lot Rural Community that just happened to have a feasible powerline? This is what is happening right now. If this were the case, in the early stages of investigations, the developer would need to relocate to a site free of all the previously above mentioned impacts.
- I am trying to grow and develop my farm, but have instead spent months researching, learning and trying to understand these guidelines to protect my farm. Something isn't quite right with this equation. Next I will have to find thousands of dollars to fight my own fight here in the Clarence Valley.

There now must be thousands of Land Owners and Billions of Dollars' worth of land affected in New South Wales alone.

I understand the need and demand for Renewable Energy but with the size and sheer scale of these excessive amounts of Applications Lodged, that there needs to be guidelines urgently put in place to protect us the Closest Land Owners from these invited in developers only leasing the farmland.

With the amount of applications I am notified of by NSW Planning, and from my days and days of research, it is justified that this time is being termed a "Gold Rush" moment for all these late applicants.

Thank you for your time, If NSW Planning can't protect us all, I not sure who can?
We need the guidelines modified into the application process to ensure the People, Landowners & the Environment have more rights and privileges than that of the developers who are arriving.
Rights for us the NSW People, and not against us.

Yours Faithfully,

Peter Drayton

From: noreply@feedback.planningportal.nsw.gov.au
Sent: Friday, 18 February 2022 1:39 PM
To: DPE Energy and Resources Policy Mailbox
Subject: Webform submission from: Revised Large-Scale Solar Energy Guidelines

Follow Up Flag: Follow up
Flag Status: Flagged

Submitted on Fri, 18/02/2022 - 13:39

Submitted by: Anonymous

Submitted values are:

Submission Type

I am making a personal submission

Name

First name

Pamela

Last name

Reeves

I would like my submission to remain confidential

No

Info

Email

Suburb/Town & Postcode

Gladesville 2111

Please provide your view on the project

I am just providing comments

Submission

Submission on NSW Government Guidelines on Large-Scale Solar Farms
To Matthew Riley, Director – Energy and Resources Policy,

Thank you for the opportunity to provide feedback on the NSW Government's draft large-scale solar guidelines. I support the guidelines with some improvements that relate to local community needs around solar projects, outlined below.

Land Use

It's critical to balance the needs of food production and biodiversity protection, with the need for clean, cheap energy and with the benefits that large scale renewables bring to host landholders and regional communities.

Where high-value agricultural land is used by solar developers, the project should always be designed for dual use, enabling farming to continue under panels. For example, offering agistment for sheep grazing, horticulture or growing pollinator habitat(p 35).

While the guidelines should protect the utility of high-value agricultural land, solar farms should be planned on cleared sites and

avoid clearing remnant or high-value vegetation, where possible. The guidelines should protect against land clearing for solar developments, which will be opposed by environmental groups and local communities.

Community consultation including community mapping to identify sites of high agricultural, environmental or cultural value is key to identifying local perceptions of the agricultural value of the land, in combination with traditional measures of agricultural value. (p 2 Appendix B)

First Nations

The Guidelines must uphold best-practice engagement and benefit-sharing with First Nations peoples, to ensure proponents embody the principles of free, prior and informed consent of Traditional Owners.

Appropriate care and consultation must be taken with local First Nations groups and restrictions placed on renewable energy developments impacting First Nations cultural heritage.

Representative local First Nations Working Groups are creating general and region-specific engagement and benefit guidelines for NSW Renewable Energy Zones. These should be utilised by all developers, including those outside of designated REZs.

Neighbours

All levels of Agricultural Impact Assessments should include consultation with neighbours of host landholders as a minimum. (p 6-8 Appendix B)

The Guidelines recommend assessing impacts on neighbour properties, however, the impact of insurance on neighbours should be identified in all Levels of Assessment. An outline of how an increase in premiums will be mitigated by the proponent should be included in the assessment.

Visual Impact Mitigation

RE-Alliance notes the mitigation measures provided for proposals with moderate or high visual impacts on pages 14-15 of Appendix A. We support options such as:

- Re-siting or removing arrays
- Re-sizing
- Vegetation screening
- At-source mitigation and
- Negotiated agreements

With regards to vegetation screening, we agree that vegetation screening can take many years to establish and during drought conditions may not achieve optimal growth or have the desired screening effect. We support the use of appropriate plant species that are suited to the environmental conditions (for example, drought-tolerant native species if relevant), sufficient irrigation (e.g. six months) and if possible, of suitable maturity to provide maximum screening effectiveness in the shortest possible time.

Community Enhancement Funds (CEFs)

Community benefit programs should prioritise locally impacted communities in the sharing of benefits from renewable energy projects (p.37). All benefit-sharing programs should be co-designed with the local community to ensure real benefit.

Solar projects should consider three different levels of benefits: neighbour benefits for directly impacted neighbouring properties; local benefits for the town most impacted by the project, and; regional benefits for the broader region hosting the project

Community representation, including representatives from highly impacted areas, should be mandatory on committees for decision making on how CEFs are spent, no matter who is responsible for administering funds.

Voluntary Planning Agreements (VPAs)

VPAs through Councils are not the preferred mechanism to administer CEFs (p 37). CEFs should be separate from VPAs.

While VPAs should be separate from CEFs, there should also be community representatives included in early VPA negotiations between developers and Councils.

Other Types of Community Benefits

There are many types of community benefit programs beyond CEFs and VPAs. These include: local decision-making, in-kind contributions, regional enhancement funds, empowerment of First Nations communities, neighbour benefits schemes, community co-investment and co-ownership, tourism and education programs, local jobs and procurement.

Ideas and Australian examples of benefits can be found in RE-Alliance's Community Benefits Handbook: www.re-alliance.org.au/community_benefits_handbook

Local Engagement

Project proponents and government need to consider the issues of consultation burden which is already being felt in REZs.

Communities need to be valued for the time they are required to put towards contributing to various consultations, Information Days, surveys and CCCs.

Part of early benefit-sharing arrangements could include providing a fund to cover the costs of people's time when they attend particular consultation sessions.

I agree to the above statement

Yes

From: noreply@feedback.planningportal.nsw.gov.au
To: [DPE Energy and Resources Policy Mailbox](#)
Subject: Webform submission from: Revised Large-Scale Solar Energy Guidelines
Date: Thursday, 24 February 2022 8:49:39 PM

Submitted on Thu, 24/02/2022 - 20:49

Submitted by: Anonymous

Submitted values are:

Submission Type

I am making a personal submission

Name

First name

Karin

Last name

Stark

I would like my submission to remain confidential

No

Info

Email

[REDACTED]

Suburb/Town & Postcode

Narromine 2821

Please provide your view on the project

I am just providing comments

Submission

Thank you for the opportunity to provide a submission for the Revised Large Scale Solar Guidelines.

Farm Renewables Consulting is an Australian owned business, working out of the Central West NSW. Director, Karin Stark has a unique position in the industry; she lives on a farming property that uses solar energy, has strong networks in regional Australia covering farming and renewables, and seeks to facilitate the adoption of on-farm renewables as a practical way to reduce costs and emissions while building resilience.

Karin has also worked as a consultant assisting Tilt Renewables with their modification proposal for the Liverpool Range Wind Farm and delivered Landholder Workshops for EnergyCo in the CWO REZ.

Karin is Founder of the annual National Renewables in Agriculture Conference and a member of the NSW Farmer's 'Energy Transition Working Group'. She brings considerable experience to the table, working with regional communities and farmers being both impacted and benefiting from large scale solar and wind farms.

Farm Renewables Consulting works with the Government, community groups and private industry, on the premise that shared stories and lived experience is one of the best ways to create meaningful change.

Working and living on the boundary of the CWO REZ has given her a comprehensive understanding of some of the issues playing out regarding large scale solar farms.

Some comments and reflections are included below.

Principle 5. 'Solar energy projects should facilitate co-location where beneficial and achievable.'

In my experience, the use of 'prime ag land' for solar is the most common issue raised in discussions about large scale solar developments.

I would urge the Department to maintain this level of aspiration on Principle 5. 'Solar energy projects should facilitate co-location where beneficial and achievable.' but would go further to suggest the NSW Government should develop zoning and tax policies that incentivize agrivoltaics such as solar grazing and cropping between panels.

This reflects the higher costs associated with the design and set up of agrivoltaic systems and the relative infancy of the agrivoltaics industry in Australia.

The NSW Government could consider specific targets, particularly in REZs, for solar farms wanting to locate on high value ag land. For example, this could be that 50% of the project area is required to co-exist with agriculture or establish pollinator habitats.

There is an opportunity for the NSW Government to lead the country in successfully integrating agriculture and energy production, by supporting demonstration projects and funding trials that include knowledge sharing with the industry and community.

Importantly, this would build social licence in the REZ communities as there is a much higher acceptance of solar farms that graze sheep between panels, than there is of solar farms seen to lock up thousands of hectares of productive land.

Agricultural Impact Assessments (AIA)

I am aware of the State Significant Agricultural Land (SSAL) mapping tool, recently out for consultation from the Department of Primary Industries. It is my understanding that no decision has been made on how the SSAL would be utilised, especially regarding interactions with REZs. Better collaboration across Government Departments is required to link up these processes and to provide clarity to the community on how these tools will be used and prioritised.

Furthermore, local consultation with REZ communities in particular would enable developers to develop a deeper understanding of the VALUE of particular agricultural land to locals, rather than rely on mapping tools that are often inaccurate with low levels of acceptance. This would further build social licence for the project.

It is hard to overstate the importance of sharing wealth and benefits with neighbours of host landholders as well as thoroughly understanding any impacts on their operations and lifestyles. The largest number of objections to projects, according to the Australian Energy Infrastructure Commissioner's Annual Reports, comes from neighbours to solar and wind properties, both before, during construction and to a lesser extent during operation.

It is therefore critical that neighbours of developments are looked after, to avoid lengthy and expensive delays to projects and costs in lawyer costs for landholders and developers.

In the Central West, I have liaised with neighbours of solar farms that due to poor construction practices and inaccuracies in early hydrology reports, severe erosion has been experienced through cropping areas. The discussions around rectification has taken months and is ongoing at this point, causing stress to the neighbouring property and thousands spend in legal advice.

A comprehensive hydrology report required as a condition of consent would have prevented this damage from happening. I strongly urge that neighbours are included in ground truthing such reports and assessments given their deep knowledge of their land and likely the project site's topography and hydrology as well.

There is currently no clarity around insurance matters for neighbour's of a solar farm. This uncertainty creates unnecessary fear and stress. I have heard examples several times that neighbour's insurance premiums increase due to a solar farm being built next door, that they can't afford to increase it but also why should it be their responsibility.

Assessment of insurance changes for neighbours and mitigation measures need to be included in all levels of the AIA.

Cumulative impacts in REZs

Lastly, it is crucial that developers and the Government understand the burden of consultation on small communities, from multiple projects wanting to develop in a REZ. As is happening in the Central West Orana REZ, locals are becoming fatigued and not engaging in meetings, consultations, social impact surveys anymore as volunteer time is stretched to the limit. This results in less than optimal input and a massive loss of valuable insights in the important development of a REZ.

Additionally, when construction starts, locals will be largely unaware and upset by the increased noise, dust, lack of housing and accommodation resulting in potential more complaints and opposition.

A regional SIA could be undertaken that developers could use, rather than each developer carrying out their own survey. Or if the Government or developers expect locals to show up for consultation, perhaps they should offer to pay them for their time.

There are numerous solutions that can be discussed, but first it needs to be accepted by all levels of Government and industry that the biggest risk to the successful roll out of REZs is not a technical risk, but a social one.

I agree to the above statement

Yes

From: noreply@feedback.planningportal.nsw.gov.au
To: [DPE Energy and Resources Policy Mailbox](#)
Subject: Webform submission from: Revised Large-Scale Solar Energy Guidelines
Date: Thursday, 24 February 2022 8:30:35 PM

Submitted on Thu, 24/02/2022 - 20:30

Submitted by: Anonymous

Submitted values are:

Submission Type

I am making a personal submission

Name

First name

Leslie and Marjorie

Last name

Deutscher

I would like my submission to remain confidential

No

Info

Email

[REDACTED]

Suburb/Town & Postcode

Goolma 2852

Please provide your view on the project

I object to it

Submission

The country currently under this plan, is classified as high quality cropping country.

I agree to the above statement

Yes

From: noreply@feedback.planningportal.nsw.gov.au
To: [DPE Energy and Resources Policy Mailbox](#)
Subject: Webform submission from: Revised Large-Scale Solar Energy Guidelines
Date: Friday, 25 February 2022 12:39:00 PM

Submitted on Fri, 25/02/2022 - 12:38

Submitted by: Anonymous

Submitted values are:

Submission Type

I am making a personal submission

Name

First name

Martin

Last name

Levins

I would like my submission to remain confidential

No

Info

Email

[REDACTED]

Suburb/Town & Postcode

Armidale

Please provide your view on the project

I support it

Submission

1.1 Need better objectives, e.g. sustainable solar industry generating widespread benefits

The Guideline should aspire to more than simply supporting 'the development of a sustainable solar industry by providing a consistent and responsive policy framework.'

NSW's Renewable Energy Zones (REZ) have already generated tremendous interest and have the potential to create win-win outcomes for the community by providing low-cost power or other community benefits, by generating renewable energy to reduce global warming and contributing to local jobs and the local economy.

Recommendation: replace the first two objectives with:

- Support the development of a sustainable solar industry in NSW that will generate widespread benefits for the local community while having minimal environmental impacts and providing lower-cost, renewable, power for NSW and elsewhere.
- Ensure best practice community engagement.
- Provide a clear, consistent and responsive policy framework that encourages industry to select suitable sites for projects to avoid or reduce the likelihood and extent of land use conflicts and environmental and social impacts

1.3.1. Renewable Energy Zones

The draft New England North West Regional Plan discusses the infrastructure required for REZ and also that the REZ should aim for "a balance between attracting investment and considering the interests of the community."

The costs of infrastructure, especially maintaining roads that serve regional areas, can be excessive and amount to many millions of dollars. The community's interest would not be well served if large scale solar developers did not contribute their fair share of the costs, commensurate with the value of development.

When there are many more expressions of interest for developments in a REZ than available capacity, good planning requires that applications are assessed on all aspects of the development, including value and benefits to the community, so that the best ones can be chosen according to their environmental soundness, visual amenity and community benefits, as well as commercial considerations.

Recommendation: include the advice in the New England North West Regional Plan that REZ should aim for "a balance between attracting investment and considering the interests of the community" and that developers should contribute their fair share of the costs of maintaining infrastructure commensurate with the value of the development. The Guidelines should also mention that, when there are many more expressions of interest than available capacity applications should be assessed on their environmental soundness, community benefits and visual amenity, so that those with the greatest merit and value to both NSW and the local community can be chosen.

3. Community and stakeholder engagement

Armidale Regional Council's draft Community Engagement and Benefit Sharing for Renewable Energy Projects Policy states: "Armidale Regional Council expects developers of energy projects to deliver authentic community engagement that goes beyond compliance level requirements and seeks to actively involve community members in the design and decision-making process of new developments. Engagement should start early in the site feasibility stage and continue through the entire life of the project, including decommissioning. As a host community of a NSW Renewable Energy

Zone (REZ), Armidale Regional Council seeks to strategically guide development to maximise community benefit, engagement and create positive lasting outcomes in a manner which minimizes cumulative impacts of multiple new energy developments, for both the community and investors alike.”

Best practice engagement, such as that described above, offer a win-win-win outcomes that benefit both the developer and the local community and, by generating clean, renewable energy that should drive down power prices, all of NSW.

Recommendation: The Guideline should describe and recommend best practice community engagement (including establishing Community Consultative Committees) and results in a harmonious development that enjoys the support of the community.

5.4.1. Infrastructure contributions and Voluntary Planning Agreements

Recommendation: The larger the project, the greater its impact on the environment and the local community. Consequently, the cap of \$450,000 on section 7.12 levies is inappropriate and should be removed. As implied by their name, Voluntary Planning Agreements are voluntary, so should be left to the discretion of the developer and the local council. It is inappropriate for the Guideline to limit or constrain them.

5.4.2. Benefit sharing and agreements

Recommendation: The Guideline should require all projects to have benefit-sharing agreements based on a levy of at least 1% of the capital investment value (CIV) of the project. The levy should be paid into a fund administered by the local council with the help of a community consultative committee.

5.5. Decommissioning and rehabilitation

As stated in the Guidelines: “Land must be rehabilitated and restored pre-existing use, including the pre-existing land and soil capability class if previously used for agricultural purposes.”

Recommendation: The financial assurances (that the Guideline recommends should be dealt with in commercial arrangements outside of the planning system) should include appropriate bonds and rehabilitation funds similar to those applied to extractive industry projects.

I agree to the above statement

Yes

From: noreply@feedback.planningportal.nsw.gov.au
To: [DPE Energy and Resources Policy Mailbox](#)
Subject: Webform submission from: Revised Large-Scale Solar Energy Guidelines
Date: Friday, 25 February 2022 6:01:08 PM

Submitted on Fri, 25/02/2022 - 18:00

Submitted by: Anonymous

Submitted values are:

Submission Type

I am making a personal submission

Name

First name

Annie

Last name

Nielsen

I would like my submission to remain confidential

No

Info

Email

[REDACTED]

Suburb/Town & Postcode

Winston Hills

Please provide your view on the project

I am just providing comments

Submission

Submission on Large Scale Solar

1.1 The Guidelines need to be stronger, e.g. sustainable solar industry generating widespread benefits

The Guideline should not simply support 'the development of a sustainable solar industry by providing a consistent and responsive policy framework.' but should suggest strengthening it.

NSW's Renewable Energy Zones (REZ) are extremely popular and have the potential to create win-win outcomes for the community by providing low-cost power and by generating renewable energy to reduce global warming and contributing to local jobs.

Recommendation: replace the first two objectives with:

- Support the further development of a sustainable solar industry in NSW that will generate widespread benefits for the local communities while having minimal environmental impacts and providing lower-cost, renewable, power for all.
- Engage the community as much as possible.
- Provide a clear and consistent policy framework that encourages industry to select suitable sites for projects to avoid or reduce the likelihood of land use conflicts and environmental and social impacts.

1.3.1. Renewable Energy Zones

The draft New England North West Regional Plan discusses the infrastructure required for REZ and also that the REZ should aim for "a balance between attracting investment and considering the interests of the community."

The costs of infrastructure, especially maintaining roads that serve regional areas, can be excessive and amount to many millions of dollars. The community's interest would not be well served if large scale solar developers did not contribute their fair share of the costs, commensurate with the value of development.

When there are many more expressions of interest for developments in a REZ than available capacity, good planning requires that applications are assessed on all aspects of the development, including value and benefits to the community, so that the best ones can be chosen according to their environmental soundness, visual amenity and community benefits, as well as commercial considerations.

Recommendation: include the advice in the New England North West Regional Plan that REZ should aim for "a balance between attracting investment and considering the interests of the community" and that developers should contribute their fair share of the costs of maintaining infrastructure commensurate with the value of the development. The Guidelines should also mention that, when there are many more expressions of interest than available capacity applications should be assessed on their environmental soundness, community benefits and visual amenity, so that those with the greatest merit and value to both NSW and the local community can be chosen.

5.4.1. Infrastructure contributions and Voluntary Planning Agreements

Recommendation: The larger the project, the greater its impact on the environment and the local community. Consequently, the cap of \$450,000 on section 7.12 levies is inappropriate and should be removed. As implied by their name, Voluntary Planning Agreements are voluntary, so should be left to the discretion of the developer and the local council. It is inappropriate for the Guideline to limit or constrain them.

5.4.2. Benefit sharing and agreements

Recommendation: The Guideline should require all projects to have benefit-sharing agreements based on a levy of at least 1% of the capital investment value (CIV) of the project. The levy should be paid into a fund administered by the local council with the help of a community consultative committee.

5.5. Decommissioning and rehabilitation

As stated in the Guidelines: "Land must be rehabilitated and restored to pre-existing use, including the pre-existing land and soil capability class if

previously used for agricultural purposes."

Recommendation: The financial assurances (that the Guideline recommends should be dealt with in commercial arrangements outside of the planning system) should include appropriate bonds and rehabilitation funds similar to those applied to extractive industry projects.

I agree to the above statement

Yes

From: noreply@feedback.planningportal.nsw.gov.au
To: [DPE Energy and Resources Policy Mailbox](#)
Subject: Webform submission from: Revised Large-Scale Solar Energy Guidelines
Date: Friday, 25 February 2022 6:58:16 PM

Submitted on Fri, 25/02/2022 - 18:58

Submitted by: Anonymous

Submitted values are:

Submission Type

I am making a personal submission

Name

First name

John, Penny, Simon and Sally

Last name

Holland and Oates

I would like my submission to remain confidential

No

Info

Email

[REDACTED]

Suburb/Town & Postcode

Goolma 2852

Please provide your view on the project

I am just providing comments

Submission

Simon and Sally Oates
John and Penny Holland
"Weetalabah"
733 Bald Hill Rd
Goolma NSW 2852
sholla09@hotmail.com

Dear Sir, Madam,

Thank you for giving us the opportunity to present this letter to you. My husband and I, with our three young children, own and run a highly productive mixed farming operation, producing wool, meat and cereal crops next door to the proposed Sandy Creek Solar Farm site. We have studied, and practice, low impact and high productive farming and grazing methods. We are writing to express some concerns we have if the solar farm were to go ahead. These concerns include the impact the solar farm will have on quality agricultural land, social impacts on our community, environmental impacts and visual impacts.

Agricultural land

- In the guidelines it states that they like to encourage development on land with limited agricultural productivity. The majority of the land they are looking at for the proposed Sandy Creek Solar Farm is renowned as some of the most productive land in the Central West.
- It is an absolute waste of such valuable food producing land.

Social

- We have a vibrant community, all of whom belong to our local Bushfire Brigade and support our local church, tennis competition, pubs, schools, supermarkets, school buses, takeaway shops, sporting establishments etc. Our bushfire brigade will be stretched to support absentee landowners (solar farm).
- We feel there is a threat to our community with the potential of attracting the wrong type of people to our area (with construction a large number of people will be introduced to our area- some not ideal).
- Our men work long hours leaving women and children isolated- stranger impact. With many new comers to the area it is a threat to our personal safety. Also to the safety of our homes, land, personal belongings, grazing stock and machinery.
- There is a good chance the solar farm will force people to leave the area.
- There will be a lot more traffic on our roads (safety for families driving on roads, families living near roads, moving livestock along roads and having extra unnecessary traffic driving through our paddocks where the local roads are).

Environmental

- The placement of this particular solar farm is taking away from the environment.
- The solar farm will take away the homes of many local wildlife being so close to the Dapper reserve and Tucklan Forest. Part of the reserve joins our property. The proposed solar project will remove anything living e.g. homes of birds and lizards (we have a lot of finch living in fence posts).
- The impact of introduced weeds on local biodiversity and the lack of control of existing weeds, have the potential to spread onto adjoining farming land costing us time and money to control, and threatening native grasses.
- It has been scientifically shown that trees attract rain/moisture and solar panels do not.

Visual Impacts

- Our area is a very quiet and peaceful area with amazing views that will be completely destroyed if the mass of proposed solar panels are allowed to go ahead.

- It will also take a lot of value away from the land and community we have built up.
- It will be in clear view of many homes around here and there are a lot of neighbouring land owners who are also concerned about the project going ahead.

We don't have a problem with solar energy. In fact, we are supportive of renewable energy, but feel there must be a more appropriate area, where the land is less productive and the solar farms would be less exposed to the entire community. Why do you think people object to solar farms anywhere- because the social and environmental impacts are so great, Why do people sell land to solar development- these people are usually absentee land owners who don't care, and are paid a lot of money for the land. They have also bought highly sort after country as a good investment and again just want money- short term mind set. Where does our food come from? Why would you build a solar farm on land that is so valuable and productive? You can't buy land like it in NSW any more. We have tried to expand and still hope to, but this is very hard when big companies like Origin and BP come in and spend a huge amount of money to buy and lease the land hoping to benefit from solar. We are seriously concerned about being able to retain the farming expertise that has taken generations to develop. My family (my parents- John and Penny, my husband and I, my brothers and their families) are currently in the process of intergenerational land transfer. We pride ourselves on being generations of educated people caring for the environment and have serious concerns for future generations.

We hope you will take our concerns into consideration when making decisions about the proposed solar project.

Thank you again for your time and we thank you in advance for responding to our concerns.

Sincerely,

Sally and Simon Oates, and John and Penny Holland

I agree to the above statement

Yes

From: noreply@feedback.planningportal.nsw.gov.au
To: [DPE Energy and Resources Policy Mailbox](#)
Subject: Webform submission from: Revised Large-Scale Solar Energy Guidelines
Date: Friday, 25 February 2022 8:55:27 PM
Attachments: [sub_large_scale_solar.pdf](#)

Submitted on Fri, 25/02/2022 - 20:52

Submitted by: Anonymous

Submitted values are:

Submission Type

I am making a personal submission

Name

First name

Dr Dorothy L

Last name

Robinson

I would like my submission to remain confidential

No

Info

Email

[REDACTED]

Suburb/Town & Postcode

Armidale

Please provide your view on the project

I am just providing comments

Submission file

[sub_large_scale_solar.pdf](#)

Submission

Mat hew Riley, Director – Energy and Resources Policy
Department of Planning, Industry and Environment
Locked Bag 5022 Parramatta NSW 2124

Please see the file that has been uploaded.

I agree to the above statement

Yes

Submission: draft Large-Scale Solar Energy Guideline

Please consider the suggestions below that will make the Guideline even better, allowing it to generate even greater benefits and satisfaction in communities where large scale solar installations are planned. This will encourage greater uptake of renewable energy and assist the transition to a clean, environmentally-friendly economy and reduce the cost of power for all residents of NSW.

1.1 Recommendation: replace the first two objectives with:

- Support the development of a sustainable solar industry in NSW that will generate widespread benefits for local communities as well as the whole of NSW, while having minimal environmental impacts and providing lower-cost renewable power.
- Ensure best practice community engagement.
- Provide a clear, consistent and responsive policy framework that encourages industry to consult with the local community and local councils, enabling suitable sites to be selected for projects, and avoid or reduce the likelihood and extent of land use conflicts and environmental and social impacts.

Reason As noted by several other submitters, the Guideline should aspire to do more than just support *'the development of a sustainable solar industry by providing a consistent and responsive policy framework.'* Best practice engagement with the local community and local councils helps ensure that all developments are appropriately sited and gain community support, creating a win-win-win outcomes that benefit the developer, the local community and, by generating clean, renewable energy that should drive down power prices, all of NSW.

1.3.1. Renewable Energy Zones (REZ)

Recommendations: The principles of good planning require us to take advantage of the opportunities available and use them to create the best possible outcomes for the community. The Guideline should mention that REZ represent a once-in-a lifetime opportunity because many more expressions of interest have been generated than available capacity. Development applications should therefore be assessed on their environmental soundness, community benefits and visual amenity, so that those with the greatest merit and value to both NSW and the local community can be chosen.

The Guideline should also note the potential to create win-win outcomes for local communities, including low-cost power to soak up surpluses when generation exceeds transmission capacity, local jobs to take advantage of the local power that will boost the local economy, other community benefits to help attract workers to the area, and at the same time create a renewable energy powerhouse that substantially reduces global warming.

The Guideline should recognise the importance of clean, renewable power, and work with local councils to identify how benefits can accrue to local communities and the region. It is estimated that the New England REZ will attract \$10 billion worth of investment, generate power worth over \$30 billion, and provide enough electricity to power 3.5 million homes, more than half the households in NSW.

The Guideline should also include the advice in the New England North West Regional Plan that REZ should aim for *"a balance between attracting investment and considering the interests of the community"* and that developers should contribute their fair share of the costs of maintaining infrastructure commensurate with the value of the development.

The costs of infrastructure can be excessive, amounting to many millions of dollars, e.g. maintaining roads that serve regional areas. The community's interest would not be well served if large scale solar developers did not contribute their fair share of the costs, commensurate with the value of development.

The Guideline should also provide information to encourage local use of the power, consistent with the NSW Clean Air Strategy *“Planning measures can also reduce wood heater emissions by supporting efficient housing that reduces heating demand, and clean and efficient technologies such as reverse cycle air-conditioning, coupled with renewable energy to meet residual demand.”*

The New England REZ is centered on Armidale, which suffers from considerable wintertime air pollution. [Peer-reviewed research published in the Medical Journal of Australia](#) shows that that in Armidale, wood smoke pollution reduces life expectancy by almost a year, corresponding to 210 lost years of life annually, or 14 premature deaths per year, an estimated cost of \$10,930 per heater per year, with total annual financial cost of \$33 million.

The Guideline should include recommendations about how REZ could be used to encourage increased use of clean, renewable, low-cost power. For example, community-benefit sharing schemes could include local power-sharing or peer-to-peer energy trading (facilitated by the NSW Government-owned network, Essential Energy), employ community batteries to reduce network congestion, and support schemes to replace polluting wood heaters with efficient reverse cycle systems that are clean, convenient, have lower running costs than buying firewood, and cause less global warming.



3. Community and stakeholder engagement

Armidale Regional Council’s draft ***Community Engagement and Benefit Sharing for Renewable Energy Projects Policy*** states: *“Armidale Regional Council expects developers of energy projects to deliver authentic community engagement that goes beyond compliance level requirements and seeks to actively involve community members in the design and decision-making process of new developments.*

Engagement should start early in the site feasibility stage and continue through the entire life of the project, including decommissioning. As a host community of a NSW Renewable Energy Zone (REZ), Armidale Regional Council seeks to strategically guide development to maximise community benefit, engagement and create positive lasting outcomes in a manner which minimizes cumulative impacts of multiple new energy developments, for both the community and investors alike.”

Best practice engagement, such as that described above, helps create win-win-win outcomes that benefit the developer, the local community and, by generating clean, renewable energy that should drive down power prices, all of NSW.

Recommendation: The Guideline should describe and recommend best practice community engagement (including establishing Community Consultative Committees) to ensure that the resulting developments benefit the local community and so create harmony and widespread community support.

4.2 Site Selection

Table 1 (Key factors to be considered during site selection) states that “Siting of solar energy infrastructure should avoid important agricultural land (Section 5.2) ... The compatibility of a solar energy project with existing agricultural land uses should also be considered including whether the project can be co-located with existing uses.” It would be helpful to mention examples of agricultural operations that can co-exist with solar farms, e.g. agistment for sheep grazing and horticulture.

5.4.1. Infrastructure contributions and Voluntary Planning Agreements

Recommendation: The larger the project, the greater its impact on the environment and the local community. Consequently, the cap of \$450,000 on section 7.12 levies is inappropriate and should be removed. As implied by their name, Voluntary Planning Agreements are voluntary, so should be left to the discretion of the developer and the local council. It is inappropriate for the Guideline to limit or constrain them.

5.4.2. Benefit sharing and agreements

Recommendation: The Guideline should note the win-win outcome of local communities supporting developments from which they will benefit. Consequently, all projects should have benefit-sharing agreements based on a levy of at least 1% of the capital investment value (CIV) of the project. The levy should be paid into a fund administered by the local council with the help of a community consultative committee.

5.5. Decommissioning and rehabilitation

As stated in the Guideline: *“Land must be rehabilitated and restored pre-existing use, including the pre-existing land and soil capability class if previously used for agricultural purposes.”*

Recommendation: The financial assurances (that the Guideline recommends should be dealt with in commercial arrangements outside of the planning system) should include appropriate bonds and rehabilitation funds similar to those applied to extractive industry projects.

From: noreply@feedback.planningportal.nsw.gov.au
To: [DPE Energy and Resources Policy Mailbox](#)
Subject: Webform submission from: Revised Large-Scale Solar Energy Guidelines
Date: Friday, 25 February 2022 9:07:48 PM
Attachments: [aaqg_submission_large_scale_solar.pdf](#)

Submitted on Fri, 25/02/2022 - 21:06

Submitted by: Anonymous

Submitted values are:

Submission Type

I am submitting on behalf of my organisation

Name

First name

Edward

Last name

Campbell

I would like my submission to remain confidential

No

Info

Email

[REDACTED]

Suburb/Town & Postcode

Armidale, 2350

Please provide your view on the project

I am just providing comments

Submission file

[aaqg_submission_large_scale_solar.pdf](#)

Submission

Submission by Australian Air Quality Group

I agree to the above statement

Yes

Submission: draft Large-Scale Solar Energy Guideline

Thank you for the opportunity to provide some comments on the NSW Large-Scale Solar Energy Guidelines.

Below are some suggestions about how to make the draft even better, so that it provides even greater benefits for both the communities that host large scale solar installations, and the whole of NSW.

1.1 Recommendation: replace the first two objectives with:

- Support the development of a sustainable solar industry in NSW that will generate widespread benefits for local communities as well as the whole of NSW, while having minimal environmental impacts and providing lower-cost renewable power.
- Ensure best practice community engagement.
- Provide a clear, consistent and responsive policy framework that encourages industry to consult with the local community and local councils, enabling suitable sites to be selected for projects, and avoid or reduce the likelihood and extent of land use conflicts and environmental and social impacts.

Reason The Guideline should aspire to do more than just support ‘*the development of a sustainable solar industry by providing a consistent and responsive policy framework.*’ Best practice engagement with the local community and local councils helps ensure that all developments are appropriately sited and gain community support, creating a win-win-win outcomes that benefit the developer, the local community and, by generating clean, renewable energy that should drive down power prices, all of NSW.

1.3.1. Renewable Energy Zones

Recommendations: The Guideline should mention that, when there are many more expressions of interest than available capacity in a REZ, development applications should be assessed on their environmental soundness, community benefits and visual amenity, so that those with the greatest merit and value to both NSW and the local community can be chosen.

The Guideline should also note the tremendous interest in NSW’s Renewable Energy Zones (REZ) and that they have the potential to create win-win outcomes for local communities, including low-cost power to soak up surpluses when generation exceeds transmission capacity, local jobs to take advantage of the local power that will boost the local economy, other community benefits to help attract workers to the area, and at the same time create a renewable energy powerhouse that substantially reduces global warming.

The Guideline should recognise the importance of clean, renewable power, and work with local councils to identify how benefits can accrue to local communities and the region. It is estimated that the New England REZ will attract \$10 billion worth of investment, generate power worth over \$30 billion, and provide enough electricity to power 3.5 million homes, more than half the households in NSW.

The Guideline should include the advice in the New England North West Regional Plan that REZ should aim for “*a balance between attracting investment and considering the interests of the community*” and that developers should contribute their fair share of the costs of maintaining infrastructure commensurate with the value of the development.

The costs of infrastructure can be excessive, amounting to many millions of dollars, e.g. maintaining roads that serve regional areas. The community’s interest would not be well served if large scale solar developers did not contribute their fair share of the costs, commensurate with the value of development.

The Guideline should also provide information to encourage local use of the power, consistent with the NSW Clean Air Strategy “*Planning measures can also reduce wood heater emissions by supporting efficient housing that reduces heating demand, and clean and efficient technologies such as reverse cycle air-conditioning, coupled with renewable energy to meet residual demand.*”

The New England REZ is centered on Armidale, which suffers from considerable wintertime air pollution. [Peer-reviewed research published in the Medical Journal of Australia](#) shows that that in Armidale, wood smoke pollution reduces life expectancy by almost a year, corresponding to 210 lost years of life annually, or 14 premature deaths per year, an estimated cost of \$10,930 per heater per year, with total annual financial cost of \$33 million.

The Guideline should include recommendations about how REZ could be used to encourage community-benefit sharing schemes, e.g. local power-sharing or peer-to-peer energy trading (facilitated by the NSW Government Owned network, Essential Energy), community batteries to reduce network congestion, and support for schemes to replace polluting wood heaters with efficient reverse cycle systems that are clean, convenient, have lower running costs than buying firewood and will cause less global warming.



3. Community and stakeholder engagement

Armidale Regional Council's draft ***Community Engagement and Benefit Sharing for Renewable Energy Projects Policy*** states: "*Armidale Regional Council expects developers of energy projects to deliver authentic community engagement that goes beyond compliance level requirements and seeks to actively involve community members in the design and decision-making process of new developments. Engagement should start early in the site feasibility stage and continue through the entire life of the project, including decommissioning. As a host community of a NSW Renewable Energy Zone (REZ), Armidale Regional Council seeks to strategically guide development to maximise community benefit, engagement and create positive lasting outcomes in a manner which minimizes cumulative impacts of multiple new energy developments, for both the community and investors alike.*"

Best practice engagement, such as that described above, helps create win-win-win outcomes that benefit the developer, the local community and, by generating clean, renewable energy that should drive down power prices, all of NSW.

Recommendation: The Guideline should describe and recommend best practice community engagement (including establishing Community Consultative Committees) to ensure that the resulting developments benefit the local community and so create harmony and widespread community support.

4.2 Site Selection

Table 1 (Key factors to be considered during site selection) states that “Siting of solar energy infrastructure should avoid important agricultural land (Section 5.2) ... The compatibility of a solar energy project with existing agricultural land uses should also be considered including whether the project can be co-located with existing uses.” It would be helpful to mention examples of agricultural operations that can co-exist with solar farms, e.g. agistment for sheep grazing and horticulture.

5.4.1. Infrastructure contributions and Voluntary Planning Agreements

Recommendation: The larger the project, the greater its impact on the environment and the local community. Consequently, the cap of \$450,000 on section 7.12 levies is inappropriate and should be removed. As implied by their name, Voluntary Planning Agreements are voluntary, so should be left to the discretion of the developer and the local council. It is inappropriate for the Guideline to limit or constrain them.

5.4.2. Benefit sharing and agreements

Recommendation: The Guideline should note the win-win outcome of local communities supporting developments from which they will benefit. Consequently, all projects should have benefit-sharing agreements based on a levy of at least 1% of the capital investment value (CIV) of the project. The levy should be paid into a fund administered by the local council with the help of a community consultative committee.

5.5. Decommissioning and rehabilitation

As stated in the Guideline: *“Land must be rehabilitated and restored to pre-existing use, including the pre-existing land and soil capability class if previously used for agricultural purposes.”*

Recommendation: The financial assurances (that the Guideline recommends should be dealt with in commercial arrangements outside of the planning system) should include appropriate bonds and rehabilitation funds similar to those applied to extractive industry projects.

From: noreply@feedback.planningportal.nsw.gov.au
To: [DPE Energy and Resources Policy Mailbox](#)
Subject: Webform submission from: Revised Large-Scale Solar Energy Guidelines
Date: Friday, 25 February 2022 10:04:42 PM

Submitted on Fri, 25/02/2022 - 22:04

Submitted by: Anonymous

Submitted values are:

Submission Type

I am making a personal submission

Name

First name

Beth

Last name

White

I would like my submission to remain confidential

No

Info

Email

[REDACTED]

Suburb/Town & Postcode

Ben lomond 2365

Please provide your view on the project

I am just providing comments

Submission

Submission: NSW draft Large-Scale Solar Energy Guideline

Thank you for the opportunity to provide comment on the NSW draft Large-Scale Solar Energy Guidelines.

Some suggestions for inclusion to improve, provide even greater benefit and offer some better guarantees for local communities in consideration of large scale solar installations that, impact them for the benefit of the rest of NSW.

1.1 Need better objectives, e.g. sustainable solar industry generating widespread benefits

The Guideline should aspire to more than simply supporting 'the development of a sustainable solar industry by providing a consistent and responsive policy framework.'

NSW's Renewable Energy Zones (REZ) have already generated significant interest and have the potential to benefit the wider community only if it can provide guaranteed power supply; other community benefits, within a framework of establishing independence from the multinationals who have been enabled to dominate the processes for generating reliable energy thereby leaving communities and their local economies vulnerable. (there are lessons in watching Europe assess its vulnerability having allowed itself to become dependent on Russia. If the Europeans 40% reliance on Russian gas isn't ringing massive alarm bells for Australia on the extreme danger of not being energy independent - we have no hope - will obviously end up a vassal state of China!)

Include in the objectives:

- Support the development of a sustainable independent solar industry in NSW that will protect NSW electricity generation and offer widespread benefits for the local community while having minimal foreign intervention, minimal environmental impacts and provide reliable power for NSW and elsewhere.
- Reinforce a demand for 'non-toxic' status through a 'no-contamination guarantee' supported by ongoing independent toxicity testing of soils and water of all surrounding land to ensure validity of the claim, accountability and management of any breach detected and measures to remediate all environmental impact.
- Disclose all state and local fees and charges that may arise from EGW on a property – like transaction tax.
- Demand surety and guarantee that all procurements meet conditions of The Modern Slavery Act 2018. Residents of NSW take little solace in their own comfort as a beneficiary of the renewable industry, if the expectations of the personal safety of employees in the supply chain are not met.
- Ensure transparency by both Department of Planning (with up to date mapping of all applications and granted SEARS) as well as obligations for proponents (and their scouts) for honesty, declared pecuniary interest of contracted legal professionals, and declarations of landholder indemnity, as a component of best practice community engagement.
- Provide a clear, consistent and responsive policy framework that encourages industry to select suitable sites for projects to avoid or reduce the likelihood and extent of land use conflicts and environmental and social impacts.

1.3.1. Renewable Energy Zones

Recommendation:

Nothing can either prepare a community for, nor compensate for implications of cumulative impact. The guidelines must include more serious consideration of the social interference and mental consequences of multiple projects converging on communities – to the left, to the right, ahead and behind – just poaching without conclusive outcomes. These practices just inject truncated mental trauma for which, at present, there is no accountability. This has to change in the Dept. Planning processes.

The REZ should aim for "a balance between; attracting investment and considering the interests of the community"

When there are more "registrations of interest" for developments in a REZ than available capacity; that advantage be taken of this to re-assess all applications against all aspects of the development, including calculation of demand on and sacrifices by the community, as well as the benefits to the community. Local Councils are best placed to understand local implications and should be included in assessment of matters like traffic movements and suitability of transport corridors.

Management of cumulative impact must feature here and here is an opportunity to insist that claims of environmental guarantees for instance must be underpinned by appropriate independent research, ongoing testing, sound assessment of contamination, visual amenity, capacity of local infrastructure, use of or establishment of local facilities and application of significant community benefits, in addition to any commercial considerations. Developers should contribute to the costs of research, monitoring, reporting, recompense for failures and oversight, maintenance of public

infrastructure commensurate with the value of the development.

3. Community and stakeholder engagement

Armidale Regional Council's draft Community Engagement and Benefit Sharing for Renewable Energy Projects Policy states: "Armidale Regional Council expects developers of energy projects to deliver authentic community engagement that goes beyond compliance level requirements and seeks to actively involve community members in the design and decision-making process of new developments. Engagement should start early in the site feasibility stage and continue through the entire life of the project, including decommissioning. As a host community of a NSW Renewable Energy Zone (REZ), Armidale Regional Council seeks to strategically guide development to maximise community benefit, engagement and create positive lasting outcomes in a manner which minimizes cumulative impacts of multiple new energy developments, for both the community and investors alike." Best practice engagement, should offer clarity of minimum expectation of the developer, surety for the local community and a reliable, independent energy source that should apply to all of NSW.

Recommendation: The Guideline should describe a requirement for best, transparent practices in community engagement, inclusive of balanced, independent Community Consultative Committees (or the local Government reference groups) In the interests of a 'best chance' for harmony in the progression of a development that embodies support by the majority of the community.

5.4.2. Benefit sharing and agreements

Recommendation: The Guideline should require all projects to have benefit-sharing agreements based on a levy of at least 1% of the capital investment value (CIV) of the project. The levy should be paid into a fund administered by committees of the Joint Organisation of local councils involved across council boundaries, in recognition of similarities and differences and in respect of the need for consistency across districts and the greater understanding by local councils of their local specialities, eccentricities and vulnerabilities. There are avenues within Councils for involvement by reference groups from the communities in conjunction with the community consultative committee selected for the purpose.

5.5. Decommissioning and rehabilitation

As stated in the Guidelines: "Land must be rehabilitated and restored pre-existing use, including the pre-existing land and soil capability class if previously used for agricultural purposes."

Therefore the financial assurances (that the Guideline recommends should be dealt with in commercial arrangements outside of the planning system) should include appropriate bonds and rehabilitation funds similar to those applied to extractive industry projects and be conditional prior to any contractual agreement. Realistic timeframes aligned to the work should have an appropriate penalty clause.

Yours sincerely

Beth White

I agree to the above statement

Yes

From: noreply@feedback.planningportal.nsw.gov.au
To: [DPE Energy and Resources Policy Mailbox](#)
Subject: Webform submission from: Revised Large-Scale Solar Energy Guidelines
Date: Saturday, 26 February 2022 12:02:42 AM

Submitted on Sat, 26/02/2022 - 00:02

Submitted by: Anonymous

Submitted values are:

Submission Type

I am making a personal submission

Name

First name

Lynette

Last name

LaBlack

I would like my submission to remain confidential

No

Info

Email

[REDACTED]

Suburb/Town & Postcode

Lake Albert, 2650

Please provide your view on the project

I object to it

Submission

What a wasted opportunity & a massive, as expected disappointment this guideline presentation is!

There is no genuine benefit sharing - mutually agreed opportunities in this land use - Agriculture/Solar conflict - it's all long proven pain & no gain for Solar victims of Woke Wagga Wagga!

Where is the moratorium landholders are calling for - to determine the science regarding the contamination risks for our limited, irreplaceable FOOD resource land from toxic contamination large-scale Solar Electricity Generating Works?

Where are the conditions of consent 5.5.3 that include no contamination of the land/water during operation - especially when post approval requirements such as management plans are not required?

Why ever is it that financial assurances should not be required by conditions of consent & any financial assurances should be dealt with in commercial arrangements out of the planning system - when Solar developers should be paying up front pre-construction contamination/clean up guarantees & decommissioning/rehabilitation bonds to support their false "non-toxic, inert, unbreakable" Solar panel claims - which the DPIE & IPCN carelessly & strangely accept for the 20 to 50 decades long life - as stated for the various Solar EG Works without question?

All DPIE & IPCN are doing is blindly trusting the developers & Beijing's Solar panel propaganda!

Unconscionably, not once has the DPIE or IPCN ever assessed this obvious risk in their Solar approvals/determinations despite numerous calls from terrified neighbouring landholders & residents to provide the independent, peer reviewed research to prove the health & safety of these toxic classed PV Solar panels midst FOOD production.

The claims in this guideline are unproven because no consideration or assessment has ever been made to ensure there is no serious or irreversible risk to the environment - to the land/water - by stating without any determination whatsoever - that "Solar energy projects are able to be decommissioned & rehabilitated without any long term impacts to the land, including soil fertility." This is totally unsupported by evidence & fully expected to be absolutely impossible!

The increased fire risk is far more concerning than many realise with Solar EG Works impossible to protect from fire & the smoke hazard - including hazardous burning elastomers - with carcinogenic & teratogenic (birth defect) impacts.

Fire & Rescue NSW is yet to even research what on earth to do regarding Solar EG Works' fires - with no funding available as yet to even research these risks.

They have only just begun discussing the growing lithium-ion battery & Battery Storage System fires this week following an EOI.

Rural communities are being carelessly experimented on by bureaucrats & policy makers - which RE hastily pushed out - with no prior research or scientific determination whatsoever at the expense of human health & lives!

Waste management neglects the massive waste during the operational stage from the DPIE's own predictions of increased storm severity - hail damage, increasing fires, typical ongoing degradation, replacement - updating with more efficient panels, etc.

This is NOT "negligible".

There is an unplanned for toxic waste tsunami rolling in!

To claim that the current volume of PV Solar waste "is not currently significant, but expected to grow over the next few decades" is misleading & inaccurate! Already this pile of ever increasing toxic waste is a burden to numerous local Councils - with much of it carelessly chucked inappropriately in landfill to contaminate the land & water because the required research has still not been completed to ensure full recycling is even possible, let alone ever financially viable without massive subsidies.

To pretend this is part of the circular economy when 82% of Australia's Solar panels or polysilicon in the panels is sourced from slave labour supply chains in Xinjiang China is ludicrous - but typical of this disingenuous, fake green, fake virtuous, unethical industry!

Why the heck are we importing astronomical amounts of toxic waste burden to Australia in the form of Solar panels, Wind Turbines, Batteries & EV's to provide intermittent, unreliable energy when Australia has far superior, Australian benefiting natural energy resources of our own?

Limited, Irreplaceable Arable Land & False SSL Mapping

With only 6% of arable land in Australia we cannot compromise our limited, irreplaceable arable land for such a stupid, non-essential reason as insecure, intermittent energy that only benefits China.

The recent State Significant Land mapping draft is ridiculous - with our most reliably productive areas - the 1 % of NSW - such as Greater Hume Council area not even included - when everybody knows this area always provides essential food for drought, flood & fire relief.

Likewise DPIE purposely downgraded the superior Bomen/Eunony Valley district to enable their ugly, detrimental Solar dumps under false pretences - disgracefully labelling this as "wasteland."

They & the Solar developer are yet to bother even notifying some of the neighbours at all - let alone consulting with them prior to approval of the now regrettably constructed glaring visual amenity Solar nightmare..

One would have thought the completely unsuitable position & proven damaging impacts which locals well knew would result - would have informed any further Solar EG Works, but instead Wagga Council planners used it to set a precedent of inflicting multiple agony on the community & now triple ruination/environmental desecration under the guise of transforming from Agriculture to a RE area on wonderfully productive soil.

Being on the Brink of WW3 Should Ring Alarm Bells!

If the Europeans 40% reliance on Russian gas isn't ringing massive alarm bells for Australia on the extreme danger of not being energy independent - we have no hope - with the bureaucrats obviously intent on creating a vassal state of China!

It's reprehensible how idiotic the woke NSW & Federal Government are on this - too preoccupied with their personal pronoun nonsense & figuring out if they're a man or a woman to notice looming WW3!

Let's wonder Putin & Xi Jinping are laughing at the West!

*Prioritising Ag land over Solar EG Works is essential instead of designing more weaselling methods of co-location, inferior sheep grazing with poorly managed sheep chewing solar components - somehow fitting essential FOOD production around Solar developers ambitions & their priority grid connection.

*Solar/Wind subsidies must be immediately axed to remove our energy poverty future & bring honest marketing of far superior energy sources to the fore in order to protect our energy independence, sovereignty & national security. To continue to do otherwise is sabotaging the country & opening the door for the CCP to walk right in through the energy transition - controlling our critical energy infrastructure.

It appears foolish policy makers won't wake up until they are being carted off in tumbrils!

*Removing the nuclear energy prohibition & consideration of thorium is essential to provide the cleanest & safest energy source, along with a continuation of HELE coal - for essential, reliable, economical & plentiful base load power to make Australia strong & self sufficient - through supportive industry & manufacturing instead of being subject to fraught supply chains -dependent upon growing hostilities & blood thirsty dictators

I agree to the above statement

Yes

From: noreply@feedback.planningportal.nsw.gov.au
To: [DPE Energy and Resources Policy Mailbox](#)
Subject: Webform submission from: Revised Large-Scale Solar Energy Guidelines
Date: Saturday, 26 February 2022 12:06:49 AM

Submitted on Sat, 26/02/2022 - 00:06

Submitted by: Anonymous

Submitted values are:

Submission Type

I am making a personal submission

Name

First name

Lynette

Last name

LaBlack

I would like my submission to remain confidential

No

Info

Email

lynettelablack@live.com

Suburb/Town & Postcode

Lake Albert

Please provide your view on the project

I object to it

Submission

Cruel Torture of Rural Communities

It's quite obscene to continually & relentlessly subject rural communities to this ongoing cesspit of RE nightmares when so clearly they have been traumatised for years by the cruel, inconsiderate, dismissive & downright idiotic treatment by the NSW DPIE who have persisted ad nauseam with their illogical, completely false narrative & fudged modelling to so unjustly inflict irresponsible, environmental ruin on rural NSW - in order to feed their subsidy hungry developer buddies, bankroll the wealthy investors & controlling financial institutions, appease the ideological climate zealots & prop up the spineless politicians!

Disingenuous Schemes

There are no benefits in this facade of 'guidelines' - in fact it's full of more schemes & fluffy fantasy with reduced compliance for developers, more loopholes to avoid accountability, more inveigling opportunities for developers to suck in the naive Councils - who ignore their due diligence, indigenous groups unaware of the detrimental impacts to their treasured land/water & various associations - who all end up shelving the truth, genuine practical sustainability & responsibility to their fellow & future Australians & the local ratepayers by salivating over a bucket of VPA bribery styled funding & showy community benefits - solely designed to self promote the dodgy Solar developers.

None of this disingenuous appearance money ever makes up for the obscene destruction caused to the local environment by these fake green environmental vandals.

For years we have seen nothing but horror at Bomen/Eunony Valley - thanks to the foolish approvals of Bomen Solar & Meeka EGN Wagga Solar - which have both proven absolutely zero benefit to the local community - in fact extreme, very costly, ongoing, negative impacts - with a dismal future forecast for Wagga Council ratepayers when these contaminating Solar Works leach toxic elements on-site - migrating to the neighbour's land & vital water sources - including the Murrumbidgee floodplain.

Yet their disingenuous promoters & users laud their discredited fakeness.

Even when the woke corporates who pretend to condemn slavery in print are made aware of the shamefully unethical 100% Solar slavery supply chains used for all Solar Electricity Generating Works at Bomen Wagga Wagga that they promote - they are proud of it - disingenuously dismissing these genocidal connections as of no consequence - compared to their ill gotten financial windfall.

'Heat Island Effects' haven't been adequately addressed at all!

Food is More Important Than Solar Panels

No Agricultural Land should be entombed in Solar Electricity Generating Works for decades - as this depletes Australia's ability to produce essential food supply for Australia & for export.

Food & water are essential for human sustenance, solar panels are NOT!

Given Solar Electricity Generating Works are a heavy-metal leachate risk to the land & water, it is extremely careless & irresponsible to approve such contamination risks for any food growing land, which would be likely then, to also contaminate surrounding food growing land & water.

Solar Electricity Generating Works are Based on a False Narrative.

Considering its whole life-cycle, it is NOT clean, green, sustainable or renewable at all! In actual fact it is based on highly extractive industries - beginning with mining quartz, intensive coal-fired power, creating extensive toxic pollution, with potent SF6 leaking from Solar manufacturing. Operating Solar Works are an ugly blight on the landscape, a toxic risk to our soil, water & food supply & create an astronomical toxic waste burden following severe storm damage, fire, bulk degradation over time, when updating Solar panels for improved efficiency & at decommissioning.

Council's Need Notification of Their Responsibility/Liability

Contamination/pollution & toxic waste is an extremely concerning issue for all local Councils to deal with & they & ratepayers need to be informed by DPIE in a transparent manner - as they are ultimately responsible/liable for any land/water contamination/pollution caused by Solar Electricity Generating Works (POEO Act) *Reference:- EPA email advice included.

Solar Companies Prioritised Over Australians

The Solar company's monetary gain should not be prioritised over Australian benefit for the local people, the economy, our biodiversity, precious arable land, ecological habitat & picturesque landscape.

Basically no jobs will be available following construction as there will be with the retention of agricultural production - from the many related businesses that are continually supported in the food producing supply chain.

Where are the DPIE Guidelines regarding RE slave labour supply chains?

With 82% of Australia's Solar panels or polysilicon in the panels linked to cruelly tortured Uyghur slave labour supply chains in Xinjiang China, Solar EG Works have an extremely unethical basis. Uyghur women are being raped, forcibly sterilised, organs of Uyghurs are being removed & genocide is occurring.

The NSW Parliament Modern Slavery Act 2021 is now in force - which informs Councils & NSW DPIE regarding procurement.

What is the source of these planned Solar panels?

*<https://www.parliament.nsw.gov.au/bill/files/3873/First%20Print.pdf>

*<https://legislation.nsw.gov.au/view/whole/html/inforce/current/act-2018-03>

Rebekha Sharkie's Bill - 22nd Nov 2021.

* <https://beslaveryfree.com/uyghur>

Graphs indicating companies & solar panels connected to Xinjiang are in the following 2 links

*<https://desdemonadespair.net/2021/05/forced-labor-from-chinas-uyghur-muslims-behind-global-supply-of-solar-panels.html>

Xinjiang Solar Panels - Uyghur Slave Labour/Concentration Camps/Genocide - 'In Broad Daylight' - Professor Laura Murphy

*<https://www.shu.ac.uk/-/media/home/research/helena-kennedy-centre/projects/pdfs/evidence-base/in-broad-daylight.pdf>

How will NSW Government policy makers, approving bodies, promoters & adoptees of Net Zero, Solar/Wind Energy Transition plans now deal with this shamefully unethical & concerning issue?

Where are the NSW DPIE's National Security Guidelines

Given the dire state of warfare in the Ukraine - with Chinese energy components & Chinese company control a huge national security risk to Australia - this cannot continue.

All Solar Electricity Generating Works, Battery Storage Systems & critical energy infrastructure - such as CCP controlled Project Energy Connect are a national security risk - with components produced in China monitorable/surveilled by the Chinese Communist Party.

What Use is AUKUS When the Energy Transition Enables CCP Control?

What use is the AUKUS trilateral security pact when Australia is enabling China to walk right in through the Energy Transition?

Do the U.S & U.K know how idiotic this is for Australia's national security & therefore, their AUKUS security pact?

Instead of bolstering national security, Australian Governments are foolishly pursuing a fake green agenda - encouraging & enabling the Chinese Communist Party to increasingly & substantially control critical energy infrastructure through their sabotaging Solar/Wind energy transition.

This then threatens all of Australia's critical infrastructure which is reliant on secure energy supply.

<https://www.thegwpf.org/content/uploads/2021/12/Adams-Chinas-Energy-Dream..pdf>

National Security Risk to Australia's Critical Energy Infrastructure & All Connected Critical Infrastructure.

It is completely illogical to increase reliance on unethically produced, Chinese manufactured, inferior, unreliable & inefficient energy sources that will extensively harm Australia's independence & sovereignty, economic potential, industrial/manufacturing capability, biodiversity, precious ecological habitats, beautiful natural landscapes, limited/irreplaceable arable land & vital water sources - with Solar Electricity Generating Works entombing essential food growing land for decades & threatening to be a wide spread health hazard & serious/irreversible toxic contamination risk to our essential FOOD supply.

*Chinese energy components are a national security risk - enabling monitoring by the CCP.

All Chinese companies swear allegiance to the CCP NOT to Australia.

Project Energy Connect Interconnector plans - plugging Wagga Wagga into the Chinese Communist Party controlled Robertstown S.A substation need to be resisted & loudly condemned as nonsensical & against Australia's best interests regarding critical energy infrastructure & national security.

The major owner/controller of ElectraNet - S.A's Electricity Supplier - is the State Grid Corporation of China.

The dominating Energy Transition heavy weight Spark Renewables/Spark Infrastructure raises national security concerns being closely connected with the Cheung Kong Conglomerate - having spun off Cheung Kong Infrastructure in 2005.

*The following quote & link regarding the Chinese Communist Party was sent from the Federal Security & Intelligence Committee:-

"This push to increase the authority of the Party within companies is occurring on two tracks. First, the Party is strengthening the role of internal Party organizations (党组织) established within companies. Although required since the 1993 PRC Company Law,² these internal Party cells were relatively weak for many years and predominantly concerned with Party organisational issues such as education and recruitment.³ Since 2012, however, the Party has increased their presence in private companies and state-owned enterprises (SOEs), with media reports suggesting they are exercising a growing influence on management.⁴

Source: <https://www.csis.org/analysis/new-challenge-communist-corporate-governance>

*Notably: The USA stopped use of Chinese components in critical infrastructure - Executive Order May 2020 - due to the National Security risk posed..

* <https://www.energy.gov/articles/president-trump-signs-executive-order-securing-united-states-bulk-power-system>

Instead, through this unreliable, inferior solar/wind/battery/Interconnector transition nightmare - Australian Governments are so foolishly ever increasing reliance on China & threatening our national security. Heightened hostilities with China urgently require implementation of a similar executive order for Australia.

Energy Security + Food Security = National Security

Solar Electricity Generating Works are contrary to this & are an illogical burden for our uncontaminated food producing areas.

With no genuine, sustainable benefits whatsoever for present & future generations they rob Australia of our rich soil heritage for uncontaminated FOOD production, extensively harm the environment, are an extremely ugly, detrimental burden to rural communities & a serious threat to Australia's essential FOOD staple supply.

I agree to the above statement

Yes

From: noreply@feedback.planningportal.nsw.gov.au
To: [DPE Energy and Resources Policy Mailbox](#)
Subject: Webform submission from: Revised Large-Scale Solar Energy Guidelines
Date: Saturday, 26 February 2022 12:28:00 AM

Submitted on Sat, 26/02/2022 - 00:27

Submitted by: Anonymous

Submitted values are:

Submission Type

I am making a personal submission

Name

First name

Lynette

Last name

LaBlack

I would like my submission to remain confidential

No

Info

Email

lynnettelablack@live.com

Suburb/Town & Postcode

Lake Albert 2650

Please provide your view on the project

I object to it

Submission

Essential Questions That NSW DPIE Have to Answer Factually with Reputable, Independent, Peer Reviewed Research Prior to Solar EG Works Approvals.

Solar Companies such as Metka EGN are unable/refuse to answer these questions at all POST CONSTRUCTION - prior to operation - which is completely unacceptable & unjust treatment of rural communities & FOOD producing areas.

It is obviously too late to prevent contamination once the Solar EG Works is constructed on site!

Metka EGN Wagga North & Wagga South Solar Electricity Generating Works - Unanswered Questions - 7th Sept 2021.

Begin forwarded message:

Date: 7 September 2021 at 10:36:06 AM AEST

To: "Lluvia murillo@mytilineos.gr" <lluvia.murillo@mytilineos.gr>, "Declan.Catto@mytilineos.gr" <Declan.Catto@mytilineos.gr>, "council@wagga.nsw.gov.au" <council@wagga.nsw.gov.au>, "councillors@wagga.nsw.gov.au" <councillors@wagga.nsw.gov.au>, "GRP-Councillors@wagga.nsw.gov.au" <GRP-Councillors@wagga.nsw.gov.au>, "O'Brien.Paul@wagga.nsw.gov.au" <O'Brien.Paul@wagga.nsw.gov.au>
Subject: Metka EGN Wagga North & Wagga South Solar Electricity Generating Works - Questions.

Dear Lluvia Murillo,

Would you please provide specific detail & clarification verbally during our community meeting & in writing in answer to the following questions:-

Metka EGN's PV Solar Panel Origin & Toxicity Guarantee

1. What is the exact brand & place of manufacture for Metka's PV Solar panels for Wagga North & Wagga South Solar Electricity Generating Works - full name, address & contact details of manufacturer.

*Please identify the complete supply chain for all components which are used to process & manufacture Metka EGN's PV Solar panels.

*Are Metka EGN's Canadian Solar panels sourced from/linked to Xinjiang - enslaved Uyghurs workforce & genocide?

2. Please provide a comprehensive list of all molecular compounds/chemical elements contained in Metka EGN's PV Solar panels (including all of the components which make up the panel,) so this can be reviewed & confirmed by independent scientists.

That is, the atoms and molecules involved in the electrical components, the film, the silicon cells, the frame, etc. of these Metka EGN PV Solar panels.

3. Please provide exact clarification of the Toxicity Rating & Usage Suitability of these Metka EGN PV Solar panels as indicated in their manufacturer's product disclosure/description information paperwork & on their original packaging.

*If Metka EGN claims their panels are non-toxic, please provide Metka EGN's Non-Toxic Assurance & legally binding Guarantee to the Community & all Wagga Wagga Councillors - with supporting documentation of the same from the manufacturer.

4. Please provide Australian Accreditation Approval according to Australian Standards for these Metka EGN PV Solar panels, specifically in relation to toxicity risk potential for land/water & suitability amidst food production.

*This cannot be the Clean Energy Council as it is totally inappropriate to have the solar/wind industry funded Clean Energy Council accrediting itself.

5. Please provide the reputable, peer reviewed, independent Australian research from the NSW Government & Federal Government to prove that Metka EGN's Wagga North & Wagga South Solar Electricity Generating Works will not contaminate the land/water on site or in the surrounding district,

including the Murrumbidgee Floodplain/River.

*This research must include the typical scenarios during placement - cadmium washing from intact solar panels, hail fractured, damaged, degrading, inferior, aged, burnt PV Solar panels - with hail being a common occurrence in this rural area, bushfires also quite common & made much more likely with Me ka's presence & the other typical ongoing inevitabilities.

*This likely/inevitable, serious/irreversible contamination risk is yet to be assessed in the approval process for Me ka EGN's Wagga North & Wagga South Solar Electricity Generating Works by Wagga Wagga Council Planner & the Southern Joint Regional Planning Panel - who have both purposely excluded it, despite objector's ongoing concerns.

*Hence, valid scientific determination of this obvious environmental risk is required prior to approval/construction/operation.

*This is an extremely negligent failure as according to the POEO Act - the Local Regulatory Authority - Wagga Wagga Council is responsible/liable for any land/water contamination/pollution caused by Metka's Solar Electricity Generating Works. In effect, this is us as ratepayers!

6. What therefore, is Wagga Wagga Council's compliance regime regarding Wagga North & Wagga South Solar Electricity Generating Works? Please provide Wagga Wagga Councillor's response to all objectors, & the Wagga Wagga community ratepayers.

7. Prior to construction/operation, how is Metka EGN able to prove, ensure & guarantee that Wagga Wagga North & Wagga Wagga South Solar Electricity Generating Works will be returned to its inherent capability - ie. able to be used as food resource land, when the toxic contamination risk of Metka EGN's PV Solar panels is yet to be assessed/determined by Wagga Wagga Council, JRPP, NSW DPIE, NSW EPA, the Federal Government or any other reputable, independent, Australian body?

*Extensive overseas research highlights this heavy-metal leachate risk, with the Federal Environment Minister Susan Ley also acknowledging this risk in response to recent questions regarding large-scale PV Solar: - that "there's a looming environmental contamination disaster which might well mean that a disused panel sits in a poor landfill situation & starts to leach heavy metal chemicals" (25th August 2021 ABC Riverina.)

8. Besides the extraordinarily significant costs that would be borne by Wagga Wagga Council - regarding potential for litigation - if surrounding producer's livelihoods & that of future generations are destroyed or impacted in any way by contamination from Metka EGN's Solar Electricity Generating Works, the very local objectors - who are obviously also the local ratepayers, would be forced to additionally bear this enormous contamination cost burden.

What therefore, are Metka EGN & Wagga Wagga Council's (Councillors as community representatives not the Council Planner) bond arrangements - to cover the serious/irreversible contamination/pollution risk during the presence of Metka EGN's Solar Electricity Generating Works, in addition to the future decommissioning bond - including full remediation & waste removal?

A transparent Waste Removal/Clean Up Bond - held in perpetuity - which cannot be consumed by other Council expenditure, must be retained - specifically for unexpected storm damage, bushfire, abandonment, company collapse/exiting Australia, etc. It would obviously be essential that this remain held in tact in spite of changes to ownership of the Wagga North & Wagga South Solar Electricity Generating Works & that this would also be expanded to cover likely/inevitable failures of the host landholders - whose toxic electronic garbage is left languishing on their land for the surrounding community to suffer the consequences of.

9. Please document in detail how Metka EGN & Wagga Wagga Council will be providing ongoing, reputable, independent, peer reviewed monitoring/testing for any contamination/pollution of the land/water on the Wagga North & Wagga South Solar Electricity Generating Works site & for all surrounding land/water.

10. How will Metka EGN prevent cadmium washing from their intact PV Solar panels?

11. Please provide Metka EGN's Planned, Damaged Panel Treatment in Conjunction With Wagga Wagga Council regarding -

A. Full details of Metka EGN's local workforce that would be immediately available following a sudden, severe hail storm event or bushfire etc. to remove vast quantities - thousands, tens of thousands, or over 165,000 hail fractured/burnt PV Solar panels - prior to rainwater washing any heavy-metal leachate into the soil/water.

*Elsewhere, numerous hail fractured PV Solar panels have negligently remained untreated, in situ for more than 10 months - subject to frequent rain events!

A catastrophic failure such as this would likely render this Wagga Wagga site & surrounding land/water irreversibly contaminated for future generations - depriving them of their rightful, uncontaminated soil heritage/intergenerational equity.

B. Documented immediate availability of 'toxic classed' waste disposal/recycling facilities - with practical & financial arrangements identified & approved by the community ratepayers & Wagga Wagga Councillors, with responses from said facilities as to their willingness & ability to suitably handle vast quantities of this waste immediately, in a genuinely sustainable manner.

C. Full details of the exact procedure to be followed in order to guarantee no fragments remain & no toxic heavy-metal leachate washes via rainwater into the soil/water on site or elsewhere.

Also, identifying the product used to paint on fractured PV Solar panels & confirmation of where this product is immediately available from in commensurate large-scale quantities.

12. Please clarify the larger extent (far greater than the out of context 30m referenced) impacts to surrounding food producers of the 'Heat Island Effect' commensurate with the large-scale of Metka's Electricity Generating Works as supported by reputable, independent, peer reviewed research. This has not been determined prior to approval.

*There are unfortunately now numerous, operational, large-scale PV Solar Electricity Generating Works in the Riverina - detrimentally impacting surrounding food producers & residents with measurable, increased heat effects.

These sites provide ample opportunity to enable reputable, independent, peer reviewed, Australian research to clarify the yet to be determined extent of the already well proven 'Heat Island Effect' on the local micro-climate of impacted areas - due to the operation of large-scale PV Solar Electricity Generating Works.

The detrimental impacts on production loss, effects on pollination, hastened insect development cycle & threatened viability of life forms for surrounding landholders/residents impacted are yet to be assessed appropriately according to scale by Wagga Wagga Council, JRPP, NSW DPIE, the Federal Government & yet to be compensated for in Metka's development plans.

References cited from Professor Greg Barron-Gafford's Arizona research has proven the 'Heat Island Effect' in relation to his very small PV Solar site. However, as Barron-Gafford advised during dialogue with Peter Hall - during the Shepparton Solar Hearing, the 'Heat Island Effect' would be far greater - commensurate with the extensive size of other PV Solar Electricity Generating Works - such as Metka EGN's Solar Electricity Generating

Works & also have climatic variations.

As Professor Greg Barron-Gafford also clearly stated that further research was definitely needed to determine the actual scale of resulting impacts, it is essential that this is fully clarified & accounted for prior to approval/construction/operation.

I agree to the above statement

Yes