



# Billabong Branch

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24 February 2020

Office of the Independent Planning Commission NSW  
Level 3, 201 Elizabeth Street  
SYDNEY NSW 2000

Dear Sir/Madam

Submission – Culcairn Solar Farm SSD 10288

We refer to our previous branch submission to the NSW Department of Planning outlining members concern. A copy of that letter can be found on the NSW Department of Planning website found [here](#).

The Riverina Murray Important Agricultural Land Mapping (IAL) project continues to remain outstanding regardless of its intention to provide protection to agricultural land and food security. Renewable energy developments are drastically increasing in numbers and cumulative impacts including the loss of productive agricultural land to factors such as drought and irrigation must be considered. The mapping requires completion to overcome the utilisation of incorrect data such as soil mapping.

We wish to remind the commissioners that whilst the recommendation advises that this development is only a small percentage of agricultural land in Greater Hume and the Riverina Murray that the NSW Right to Farm Policy acknowledges that **“Only 11% of NSW is used for higher productivity agricultural uses such as cropping (dryland 9.6%, irrigated 1.3%) and horticulture (0.2%)”**.

Sensible planning could realise opportunities with a target towards areas and communities with arid or poorly producing land and renewable energy zones with these features rather than placing impact on areas that currently benefit from strong agricultural attributes.

NSW Farmers solar policy states that there should be clear guidelines and regulation for the development, operations and decommissioning of Solar Farm Energy Generation **which avoid negative impacts on current and future neighbouring landholders**. Many issues include increased heat, bushfire hazards, weeds, insurance, drainage, dust, noise, glare and livestock impacts. Members are clearly concerned by the lack of comparable evidence in relation to the impacts of large scale solar in Australian conditions and on such massive scales.

To ensure neighbouring agricultural landowners are not at risk, clear **measurable** parameters must be clearly defined quantifying outcomes to neighbours at the developers responsibility. Using words like low, medium, high and minimise in relation to impacts are not acceptable and clear definitions and measurable parameters must be applied to ensure that developers meet their responsibilities. In addition, an action should be provided by the NSW Department of Planning defining the resulting action should any responsibility of the developer not be met. All mitigation must meet its measure from construction through to operation and decommission placing zero limitation or loss on neighbouring farmers and where this is not 100% possible, compensation must be applied.

Any research used to determine the application must be proven, on comparative scales and in similar conditions due to the massive size of these developments. There is great concern that extremely large developments may bring additional impacts which may have previously been seen and therefore higher levels of mitigation may be required. Ground truthing of data and information provided by the developers must occur.

Where a lack of research exists the Precautionary Principle (Principle 15 of the Rio Declaration to which Australia is a signatory) should be applied.

Questions have been raised by members relating to sheep grazing around solar panels and given this is a basis for agricultural retention of the land the words in the recommended conditions "where practicable" could potentially result in no grazing at all.

Impacts such as increased bushfire risks and greater risks to volunteer firefighters associated to local rural landholders should be of paramount concern particularly in view of fire events recent and past.

Australia's renewable energy policy should not be driven by investment from foreign companies nor opportunistic convenience that brings inherent risk. It is important to consider that with technological advances these long term developments with no financial assurance of decommission potentially could see large tracts of valuable agricultural land become industrial waste.

It should be noted that the value of land in this area has continued to absolutely soar in the last decade with farmers moving from less reliable operations in the west to smaller, highly reliable land to ensure business sustainability. Greater Hume agricultural land is tightly held with some over 5 generations in the region being well placed to provide domestic and international markets through access to the major transport corridors for rail and road freight.

We thank you for your consideration and appreciate your efforts to ensure the protection of agricultural land and reduce impacts to neighbouring agricultural producers.

Regards

NSW Farmers Billabong Branch