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SUPPORT

Submission No: 189486

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Location:	<i>Australian Capital Territory 2601</i>	
Submitter Type:	<i>a representative of a community group, non-government organisation, business or industry group</i>	
Attachment:	<i>Peoples Climate Assembly - Submission regarding the Wallaroo Solar Farm.pdf</i>	

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Please refer to uploaded document



Peoples Climate Action Coalition

PO Box 544,
Canberra ACT 2601

The Commissioner
NSW Independent Planning Commission

Submission regarding the Wallaroo Solar Farm Ref # SSD-9261283

The Peoples Climate Assembly is in favour of the Wallaroo Solar Farm being given approval for construction and operation.

The proposal is for a 100MW solar farm comprised of 182,000 PV modules in rows mounted on trackers to follow the sun, together with a 45MW/90MWH battery and associated infrastructure such as a 132kV substation and transformers to enable connection to the grid. The stated aim of the project is to provide renewable energy and help stabilise the grid, to minimise environmental impacts, and to minimise social impacts and maximise social benefit.

The project aligns with the Commonwealth Renewable Energy Target scheme which incentivises investment in renewable energy generation and a reduction in greenhouse gas emissions from the electricity sector¹. It is also aligned with the NSW Climate Change Policy Framework², and the State's Net Zero Plan³, to support projects to save energy and emissions.

There is no doubt that we are in a climate emergency, with last year being the hottest year ever recorded, 1.64C hotter than in preindustrial times.⁴ The main driver of climate change is the burning of fossil fuels. The Paris Agreement came into effect in 2016 and is the major international attempt to address climate change. Australia has set a target under the agreement to reduce our emissions by 43% below 2005 levels by 2030 and to be net zero by 2050. To meet these commitments, Australia must replace its current reliance on fossil fuels with renewable energy and has committed to increase the share of renewable energy to 82% by 2030.⁵ The current project contributes towards this commitment.

There are a number of factors which add to the value of this project. Firstly, it is close to existing necessary infrastructure, in particular the 132kV power lines which pass adjacent to the project boundary. When combined with the decision to incorporate a substation as part of the project, this means that there is no requirement for additional power lines and easements which may have been necessary had it been determined to connect to the Canberra substation⁶.

Secondly, the project will, according to the proponent, generate 260,000MW per annum of clean energy, and will avoid 215,000 tonnes of greenhouse gas emissions per year.⁷

As well as construction and operational employment opportunities, the project will provide discounted electricity to residents and businesses within a 7km radius, and there will be community benefits during the life of the project through a community benefit fund.⁸

First Nations representatives of the Ngunnawal people (Registered Aboriginal Parties) were consulted regarding the project and a number took part in surveys for Aboriginal heritage⁹. The survey identified 13 isolated finds and five artefact scatters. Procedures are in place for any finds during construction.¹⁰

The project has taken action to avoid damage to vegetation, especially threatened ecological communities which, although remnant, have been identified as occurring within the wider project but not within the development footprint¹¹. A small area of planted native and exotic vegetation will be disturbed during construction. Action has also been taken to minimise any impact to the two legless lizard species which could conceivably occur on the site by avoiding rocky habitats. It is noted that no legless lizards were found during surveys of the area.¹²

Of the risks identified, fire is the major hazard, either off-site entering the facility or thermal runaway of the Battery Energy Storage System (BESS) leading to offsite damage. The likelihood of this occurring is considered “very unlikely” and the risk classed as “medium”.¹³ The project must conduct a Fire Safety Study and prepare an Emergency Response Plan in accordance with Industry standards and in consultation with NSW Fire and Rescue.¹⁴

The major negative impact of this proposal is visual amenity, which will have an impact on some properties with line of site to the panels. The proponent has reduced the footprint of the panels in three areas to reduce the visual impact (and to avoid possible Striped Legless Lizard habitat in area 2) and will place screening vegetation to assist ‘fragment and soften distant views of the solar farm’.¹⁵ In addition, the proponent has responded to concerns regarding glint and glare using operational controls. It was found that by not operating panels between 0° and ±5° between the hours of 5:30am and 8:30am avoids all potential glare generation for all residential, road and aviation receivers.¹⁶

The concerns raised about the impact on tourism, especially local vineyards need to be balanced with a rapidly changing climate. We must act while we still have time.

The negative reactions and media commentary highlight how critical it is to engage community and stakeholders early and often on large renewable energy projects. It is good to see that the consultation period was extended to allow more community input. A smooth, effective transition and roll out relies on good communication and engagement

with impacted communities. Working with communities, "doing with, rather than doing to" is how we build strong, resilient communities.

In conclusion, given the urgent need to:

- address the climate crisis by reducing greenhouse gas emissions;
- expand the amount of renewable energy available to enable the rapid phasing out of fossil fuel generation of electricity;
- make the most of existing transmission infrastructure; and
- avoid damage to existing native vegetation and threatened species

it is the view of the PCA, notwithstanding the visual impact on some residents in line of sight to the project, that the Wallaroo Solar Farm should be approved for construction and operation commensurate with the *Recommended Conditions of Consent*¹⁷, provided that the environmental and safety aspects are strictly enforced.

Thank you for the opportunity to comment.

Yours sincerely



John Smith

Peoples Climate Assembly

30 July 2024



The Peoples Climate Action Coalition T/A Peoples Climate Assembly (PCA) is a coalition of various climate groups including Australian Parents for Climate Action Canberra, 350/Move Beyond Coal Canberra, the ACF Community Canberra, Climate Action Canberra, Conservation Council ACT Region, and Extinction Rebellion ACT. The PCA is an organisation that believes we need to Act Now to reach zero emissions at emergency speed.

Action is the antidote to despair

The Peoples Climate Assembly acknowledges that we live on the stolen land of the Indigenous people of Australia. We acknowledge the Ngunnawal and Ngambri people, the traditional custodians of the land on which Canberra is situated. Their sovereignty was never ceded. We pay our deepest respects to our nation's First Peoples and to Elders, past and present.

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- ¹ Department of Climate Change, Energy, the Environment and Water, *Renewable Energy Target Scheme*. 19 April 2024. <https://www.dccew.gov.au/energy/renewable/target-scheme>
- ² Office of Environment and Heritage, *NSW Climate Change Policy Framework*. 2016. <https://www.energy.nsw.gov.au/sites/default/files/2022-08/nsw-climate-change-policy-framework-160618.pdf>
- ³ Department of Planning, Industry and Environment, *Net Zero Plan Stage 1: 2020-2030*. 2020. <https://www.energy.nsw.gov.au/sites/default/files/2022-08/net-zero-plan-2020-2030-200057.pdf>
- ⁴ Ajit Niranjana, *Temperatures 1.5C above pre-industrial era average for 12 months, data shows*. The Guardian, Mon 8 Jul 2024. <https://www.theguardian.com/environment/article/2024/jul/08/temperatures-1-point-5c-above-pre-industrial-era-average-for-12-months-data-shows>
- ⁵ Australian Office of Financial Management. *Australian Government Climate Change commitments, policies and programs*. November 2022. https://www.aofm.gov.au/sites/default/files/2022-11-28/Aust%20Govt%20CC%20Actions%20Update%20November%202022_1.pdf
- ⁶ Ben Cranston. *Applicant Speaker presentation Wallaroo Solar Farm*. New Energy Development. p 8 <https://www.ipcn.nsw.gov.au/resources/pac/media/files/pac/projects/2024/06/wallaroo-solar-farm/public-submission-rounds/speaker-presentations/applicant-speaker-presentation.pdf>
- ⁷ Ibid, p 9
- ⁸ Ibid.
- ⁹ NGH Pty Ltd. *Environmental Impact Statement Wallaroo Solar Farm*. April 2023. pp 100-101 <https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=SSD-9261283%2120230421T072230.528%20GMT>
- ¹⁰ Ibid. p xxx
- ¹¹ NGH Pty Ltd. *Biodiversity Development Assessment Report Wallaroo Solar Farm*. January 2023. p 20 <https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=SSD-9261283%2120230426T233642.592%20GMT>
- ¹² NGH Pty Ltd. *Environmental Impact Statement Wallaroo Solar Farm*. op. cit. p xxix
- ¹³ NGH Pty Ltd. *Preliminary Hazard Analysis Wallaroo Solar Farm*. October 2022. p 24 <https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=SSD-9261283%2120230426T233644.182%20GMT>
- ¹⁴ NGH Pty Ltd. *Response to Submissions Wallaroo Solar Farm*. November 2023. p 105 <https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=EXH-58517959%2120231120T233726.818%20GMT>
- ¹⁵ NGH Pty Ltd. *Environmental Impact Statement Wallaroo Solar Farm*. op.cit. p 6
- ¹⁶ NGH Pty Ltd. *Amendment Report Wallaroo Solar Farm*. May 2024. p 7 <https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=SSD-9261283%2120240502T011557.144%20GMT>
- ¹⁷ Department of Planning, Housing & Infrastructure. *Recommended Conditions of Consent by Independent Planning Commission of NSW*. nd. <https://www.ipcn.nsw.gov.au/resources/pac/media/files/pac/projects/2024/06/wallaroo-solar-farm/case-referral-documents-from-dphi/recommended-conditions-of-consent.pdf>