

Middlebrook Solar Farm – IPC public meeting submission – 19th September 2024

Good Morning, My name is Ben Wynn, Thank you for the opportunity to speak today and for your consideration of my statement

Can I start by saying that I am a solar farm developer specialising in agrivoltaics, and I live right here in Tamworth. I have no commercial interest to declare in this project.

I love solar energy. I believe it is critical for our transition globally to a clean energy future so as to limit the impact of global warming caused by the burning of fossil fuels. Solar panels create clean electrons for our energy use, are an amazing source of zero emissions fuel supply energy – free from that big ball of Nuclear Fission in the sky.

The following statement is my personal opinion with my professional knowledge used as a basis for forming that opinion.

We here in NSW cause less than 0.5% of the world's greenhouse gas emissions.

We have the time to do this transition right. Let's not rush this process by approving substandard proposals, particularly those that are incompatible with their current, strategically vital agricultural land use such as the Middlebrook Solar Farm proposal.

As a renewables industry, we need to build and maintain our social license with the rural communities we are asking to host these massive projects. Removing agricultural land that consistently produces high yields from a district while making a small minority of landholders, in this case 3 only, very financially well off, definitely destroys trust and completely damages the social license the rest of us are trying to achieve. My estimation is that lease payments to the 3 landholders will be between \$500k-1mil per yr, to rise with CPI; whilst the proposed community fund is a disgraceful and paltry \$36k per year; and the neighbour agreements of financial payments have not been disclosed.

The Middlebrook Solar Farm proposal, if approved, will see the removal of at least 515ha of prime agricultural land that currently supports high yield cropping and premium grazing agricultural production from this region. We are talking about a project proposed on amazingly rich alluvial soils that butt up against BSAL land. I am not at all convinced that the proponent's soil classification is accurate – it seems very odd that class 1-3 and BSAL land immediately adjacent to similarly rich alluvial soil that is only deemed as class 4 and 5 occurs in a neat corridor that the proponent has left vacant.

I couldn't disagree more with section 5.2.2 of the department's assessment report. You cannot eat solar generated electrons. The Paris agreement clearly states that agricultural land should not be destroyed or removed from the food production system to make way for solar energy. The NSW large scale solar guidelines state that developers must "avoid important agricultural land". This proposal does not do that; it simply takes advantage of the existing 330kv transmission lines and convenient road access to the detriment of agricultural production and the rural amenity of the area. Vague plans to have a few sheep grazing post construction do not replace the significant agricultural productivity loss this project will cause. I request that a detailed independent UNE study should be funded by the proponent to determine accurately the complete soil classification of the site prior to approval being considered.

I would love to spend another 8 hours pulling this proposal apart with the experience and knowledge I have – but given I am only allotted 5 mins – here are other my main points of disapproval and contention.

1. Why on earth would the NSW planning dept have a draft recommendation published that wilfully allows the destruction of 6.88ha of native vegetation and the removal of 197 trees that provide an ecosystem that supports the endangered squirrel glider. At a minimum, this proposal should be descaled so as to have zero native vegetation removal impact
2. The proponent is grossly exaggerating the FTE jobs post construction. Most Solar farms of this size have 3~5 full time employees – not 15. In my opinion, Total Energies is overstating the employment opportunities in an attempt to enhance their justification of the project being a continued local economic boost for our region
3. I note the proponent, and our council have not agreed on a VPA. We as a council area should also not agree to the proponent's estimation of capital works being only \$856mil. If the project is approved – the 1.5% contribution to council should be based on an independent quantity surveyors report pricing the proposed development. As a solar farm developer - I can't get a quote for a 780MWh battery, a 330kv substation and switchgear to come in under \$800mil – let alone an additional 400~450MWdc of solar infrastructure. In my professional view, the proponent has underestimated capital costs by AUD \$300~500mil
4. The decommissioning recommendations are woefully absent of detail; and the one thing they do detail is that infrastructure need only be removed to 500mm depth. This is disgracefully inadequate. The Australian building code dictates that electrical cable be buried to a depth of at least 600mm, and most of the tracking infrastructure piles will be installed to 1.5m depth or deeper. If you cannot reject this horribly incompatible project, I implore you all then that as a precedent condition for this project, the proponent is required to remove all of the infrastructure, regardless of the depth of installation

In conclusion, it is so disheartening to see a NSW planning draft conditions document already produced that has a watermark of 'recommended' plastered across it's pages. This reeks of a 'rubber-stamped' decision.

I know how swamped the NSW planning dept is with large scale renewable proposals; but this recommendation of approval stems from, in my view, a city centric feel-good attitude for clean energy that ignores the conflicting incompatibility of this proposal.

In my view, approval of this incompatible project would justifiably represent a failure by the NSW planning system to protect agricultural land, food security and established local economy; causing further harm to the relationship between renewable energy proponents like me, and the rural communities where a social license is needed now more than ever. Thank you.