



SYLVIA ELIOTT

OBJECT

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*Middlebrook Solar Project*

*The impact studies required of the applicant are not sufficient. The application, the approval and the conditions of consent are a deadly threat to Australian food producing capability. The planning provisions in the New South Wales (NSW) Government legislation do not protect Australian food production. The NSW Government (the State) is guilty of betraying the Australian people by its utter contempt for its duty of care to protect food-lands in NSW.*

*The NSW Department of Planning's (the Department) approval criteria does not currently provide any protection for NSW food-land. When the State verbatim adopted the recommendations detailed in the Paris Agreement 2016, the State, obliging the developers, deliberately left out all recommendations therein to protect food-producing-land. The State calls them guidelines, instead of legislating to protect the most important basic human right, to food. This is a betrayal of the people of NSW and Australia's entire economy.*

*The Department must stop processing all existing applications for large scale energy factories on food-producing land until its legislation is sufficiently informed by independent scientific studies on the impact and effects of large scale energy factories on food-producing land in NSW. Until then the Department cannot be deemed fit to assess any of these proposals.*

*In the Loomberah valley there is a farmer, his name is Kevin. Kevin operates on 1900 hectares of primary production land, 6 kilometres downstream from this solar factory site. Kevin's current output of human food to Australian Food Standards per annum is as follows:-*

*Human Food*

*120,000 kilograms of beef 400,000 meals*

*45,000 kilograms of lamb 150,000 meals*

*20,000 kilograms of pork 66,666 meals*

*3,000 tonnes of barley Chicken farm fodder BAIADA 960,000 chickens per week*

*300 tonnes of canola 130 tonnes of canola oil*

*Soil Management and Fodder*

*50 tonnes of oats for seed to finish livestock*

*12,000 lucerne bales Cattle and Horse fodder*

*Tropical grasses Cattle fodder*

*Waste produced from intensive livestock feeding is composted and used as fertiliser on the crops. Kevin does not drain water from the town water supply. He manages the soil quality by crop rotation and animal husbandry. Soil conditions affect the standard of both crops and livestock. Water conditions affect the quality of both crops and livestock. Ground water licenses are used solely on lucerne crops for horse feed. Horses are used by farmers to muster stock. Watering of the remaining crops relies upon what falls from the sky. Watering*



*of the stock relies on what falls from the sky into tanks, dams and creeks and from springs and soaks out of the substrata and aquifers.*

*Kevin sells the meat that he produces to Coles and Woolworths and local butchers in Tamworth. He is held accountable to the Australian Food Standards. To meet Australian Food Standards livestock must be finished on improved pastures. Improving pastures requires the planting of lucerne, oats and tropical grasses. The symbiosis is carefully, delicately and deliberately crafted to manage the soil for both livestock and crops. None of it can take place underneath, alongside or on top of solar panels dug into the lush alluvial soils of the Loomberah Valley.*

*This year from 1900 hectares, Kevin will feed 616,000 people one meal, through supermarket meat sections and butchers. Which equals 324 meals per hectare.*

*The Middlebrook solar Experiment takes 515 hectares out of food production. Which means 166,860 less meals next year, and forever from this land.*

*Kevin, along with other local farmers, will also produce chicken fodder to support Baiada's production of 156,000,000 chickens in the Tamworth LGA. This requires a whole separate impact study. What will BAIADA do if it has to source fodder further afield? They're always threatening Tamworth Regional Council that they will leave this region and head for the Riverina. More solar factories there now too. You will squeeze them out of NSW entirely. There go a few jobs let me say.*

*Here are some facts about Lamb (young sheep) from Kevin:*

*You cannot produce prime lamb under any solar factory. Prime lamb requires specific pasture and conditions to finish to standard.*

*Sheep cannot reproduce under solar panels because the tracking mechanisms will butcher the rams to death in their position atop the ewe during breeding activity. Sheep grazing under solar panels must be shorn short all year round or risk been skinned alive by the turning mechanisms.*

*So there are no lamb chops grazing under the solar factory. Over the *œ*life *œ* of this experiment, the supply of sheep grazing under the solar panels will die off. To restock, the land owners will then have to buy wethers (desexed male sheep) from farmers like Kevin. These wethers will be fought over for prime lamb versus solar factories. Kevin's production will be affected by the industrial-scale factory waste pouring into the soil and water in surrounding lands, substrata and aquifers and leaching into his. He will not be able to meet the Australian Food Standards. The wethers will go to the solar factory and Australians cannot produce their own prime lamb anymore.*

*So the grazing of sheep under solar factories will not feed people at all, and will not exist at all, at the end of 30 years. But likely, much much sooner than that.*

*Now beef cattle. Bulls especially, but all bovines like to scratch and push and shove themselves up against each other and anything else standing in their reach. They also like to chew on things (usually a tree) to clean their teeth. They are tall enough to reach the solar panels to have a chew and they are strong enough to damage the pylons - just being cattle in their environment. Clearly no natural beef breeding programme can operate under a solar factory. This is why the developer will not allow cattle under the solar panels. Unlike the sheep that will die or be skinned, the cows will destroy the panels and their supporting structures. And when the forever chemicals leach into the surrounding soils and substrata and waterways and aquifers, beef production will die in Australia because we cannot meet the required food standards here or anywhere else. .*

*And pork.*

*And goat.*



*The population of NSW presently at 8,500,000, is entitled to 3 meals per day which equals 9,282,000,000 meals per annum. This means that we need 28,648,148 hectares actually under primary production and yielding the same as Kevin, JUST to feed NSW.*

*Not all of the land that is zoned RU1 or RU4 in NSW can produce the yields that Kevin does. Different soil types, average rainfall, alternate access to water, different climates, bushfire, flooding, infestations, weeds, all affect what livestock will do well and what crops can be farmed.*

*Multiple independent university studies into the food production capacity of the various types of land, climate and water in NSW zoned both RU1 and RU4 is a basic requirement for the Department to be informed and to establish a base line for the preservation of NSW food production.*

*The threat to Australia's food production capacity only escalates from here. This is just one farmer who will be affected by the forever chemicals that are leached into the soils, the sub-strata, the waterways and the aquifers, of lands surrounding this experiment alone.*

*How do you propose to feed our escalating population? Are you planning on taking over the food-lands so that the government can control food production and ration it to the people? Is this the beginning of Australia's cell cities? Driven by foreign nationals with the NSW Government in their pockets? Sorry, just curious.*

*The studies and information submitted by the applicant are specifically designed to meet the Department's approval criteria. And nothing more. As merely guidelines, the developer laughs at protecting food land in Australia. The criteria becomes a ceiling to which the applicant is held answerable. But not accountable.*

*Neither the proponent nor the Department are sufficiently informed about the impact of this or any existing developments on Australia's food producing capabilities. Nowhere in the world with the exception of New Zealand at a stretch, compares to Australia. Nowhere in the world has a solar factory existed, let alone operated, for 30 years.*

*How does the Department assess what food-land should be retained for food-land? What criteria, policy, legislation, strategy and interest does the Department have in protecting food-land? Why do we have land zoned RU1 and RU4 in our State?*

*I believe it is fair to say that the Department has an obligation to all stakeholders in NSW primary production land. So that means EVERY LIVING INDIVIDUAL in New South Wales at the very least!*

*Submissions to this proposal at the IPC meeting 19 September 2024 included one from a Riverina resident living with a solar factory on their neighbour's property. The evidence in their submission points to crimes against humanity in the eternal damage being done to Australian food-land.*

*Since the impact of coal on food producing land is an entirely different study, it is not appropriate to apply the same legislation. Broad-brush strokes of the pen are criminal in this context.*

*An independent study into the viability of solar panels on rooftops in cities and on car parking spaces. Bondi Beach has an extensive car park along its beachfront. Let us have a UNE and a Charles Sturt university study into the impact of solar panels on this land providing shade and free power to businesses, beach goers, tourists and residents.*

*This is a foreign national opportunistic experiment exposing the NSW Government and it's Planning Department (with pants down to ankles), gross negligence in protecting Australian food.*

*At the very least, three independent university studies of the impacts and effects of solar factories on food producing land in NSW are demanded by this proposal.*

*Let us ask all Australians how they feel about plastic or imported beef. Or American bacon.*



**New South Wales Government**  
Independent Planning Commission

*Sincerely*

*Sylvia Elliott*

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