



**SALLY EDWARDS**

**OBJECT**

Submission No: 179745

Organisation:		Key issues: <i>Land use compatibility, Visual impact, Social impacts, Other issues</i>
Location: <i>New South Wales 2381</i>		
Submitter Type: <i>I am a member of the community with a view about the proposed development</i>		
Attachment: <i>Sally Edwards submission</i>		

Submission date: 6/14/2024 4:00:08 PM

*Please find attached my additional objection submission as suggested to me at the end of my presentation to the panel. I do not require my contact details to be redacted from the submission. Thank you for your diligence and consideration.*

*Yours Sincerely,*

*Sal Edwards*



Birriwa Solar Project IPC SUBMISSION 13<sup>th</sup> June 2024

Dear Ms Janet Milligan (Chair) and Panel Commissioners

Please accept my further submission regarding the Birriwa Solar Project. I have inserted the items I was unable to include in my presentation at the meeting, due to the limited time in the table below and any associated, comment, concern or recommendation.

Item/Details	Comment/Concern/Recommendation
Social Licence	<p>1. Section <b>4.1 of the Large Scale Solar Guidelines Aug 2022 - Importance of site selection</b> states:</p> <p>“A good site may result in greater <b>social licence</b> to operate, shorter assessment timeframes, reduced offset obligations and fewer conditions of consent to manage residual impacts.”</p> <p>Would the panel please evaluate the apparent level, or lack of “Social Licence to Operate”? With no public submissions to the Birriwa EIS or Amendment in support of the project, and no speakers presenting to the Public Meeting in support of the project, it is hard to conceive that there is any Social Licence or therefore community acceptance of the Birriwa Solar project.</p> <p>An excerpt from The-Energy-Charter_Better-Practice-Social-Licence-2023_SUMMARY which can be found at  <a href="https://www.theenergycharter.com.au/wp-content/uploads/2023/05/The-Energy-Charter_Better-Practice-Social-Licence-2023_SUMMARY.pdf">https://www.theenergycharter.com.au/wp-content/uploads/2023/05/The-Energy-Charter_Better-Practice-Social-Licence-2023_SUMMARY.pdf</a></p> <p>“Social licence to operate is a concept that reflects community acceptance or approval around the operations of an organisation and its developments. Community acceptance comes from <b>prioritising trust</b>, delivering overall positive impact and is granted and denied by the community in line with their social, political and economic conditions. Establishing social licence to operate is not simple due to it being based on the diverse values, interests and concerns that contribute to community expectations and as such <b>requires the consideration of</b></p>

Birriwa Solar Project IPC SUBMISSION 13<sup>th</sup> June 2024

	<p><b>relational aspects between the industry and communities</b>, industry affects, community understanding and confidence in a particular project.”</p> <p>I am unable to think of conditions of consent that could be put in place to adequately build the trust and acceptance of the community at this point in project development, if this was able to have been built, it would have been built by now.</p> <p>I conclude, that this site is not adequate site selection for a project of this type and scale.</p>
Cumulative Impacts	<p>It is my understanding that it is the requirement of each project to complete detailed assessments as deemed necessary by the SEARS and as set by the Department. This may include: Social and Economical Impacts, Soil and Water impacts, Biodiversity and Environmental impacts, Aboriginal heritage and culture impacts, Noise and Vibration, Visual Amenity, Air Quality, non-Aboriginal heritage, traffic and transport. An additional assessment which must take place is the cumulative impact assessment and must consider proposed, approved and operating - especially biodiversity, socio-economic and construction traffic, and must be assessed in accordance with the department’s Cumulative Impact Assessment Guidelines for State Significant Projects (PDF 1,393 KB).</p> <p>While the cumulative impact guidelines are in place, there is no requirement within these guidelines to assess on <b>combined impacts</b> direct to a community or adjoining landholder etc.</p> <p>Until such time as combined noise and vibration and combined visual amenity assessments etc are provided by the department to the Councils and Communities, these project approvals must be deferred.</p> <p>Can the panel ensure the community that adequate “Combined incremental assessments”, particularly considering social impacts to concerned communities, visual impacts to sensitive receivers/adjoining landholders and combined soil and water impacts etc, as per the guidelines have been completed?</p>

Paris Agreement	<p><b>Climate Change (Net Zero Future) Act 2023</b></p> <p>3 Purpose of Act</p> <p>(1) The purpose of this Act is to give effect to the international commitment established through the 2015 Paris Agreement</p> <p><b>(C) increase the ability to adapt to the adverse impacts of climate change</b></p> <p>does not give full effect to the Paris Agreement 2015 Article 2 1 (b) as it omits the final part of the commitment as demonstrated below:</p> <p>b. Increasing the ability to adapt to the adverse impacts of climate change <b>and foster climate resilience and low greenhouse gas emissions development, in a manner that does not threaten food production;</b></p> <p>“In a manner that does not threaten food production”. In its assessment, the Department made an error in its calculation of the area of Agricultural Productivity loss. While this was corrected through the process of the public meeting, how can the public be assured that there are no further errors of critical importance? This particular error under represented and mislead the community as to the total loss of Agricultural land.</p> <p>The loss of agricultural land is in a manner that does essentially threaten food production. Consider the flow on effects of soil degradation and dryland salinity occurring due to the installation of large-scale solar projects and the threats to future food production are heightened. This should not be over-looked or undervalued.</p>
Urban Heat	<p><b>The dangers of urban heat</b></p> <p>Average temperatures in large cities are 1 °C to 3 °C higher than in rural areas, as urban areas tend to trap more heat than natural environments. These higher temperatures can affect human health and wellbeing, economic productivity, the environment, critical infrastructure and services.</p> <p>Some urban communities are more vulnerable to higher temperatures because of the ‘urban heat island’ effect, which occurs in urban areas where paved, dark coloured surfaces such as roads, roofs, and car parks lead to heat being</p>

Birriwa Solar Project IPC SUBMISSION 13<sup>th</sup> June 2024

	<p>trapped. Source: <a href="https://www.planning.nsw.gov.au/policy-and-legislation/resilience-and-natural-hazard-risk/urban-heat">https://www.planning.nsw.gov.au/policy-and-legislation/resilience-and-natural-hazard-risk/urban-heat</a></p> <p>Could the panel please ensure that extensive independent research has been undertaken to evaluate the dangers of radiant heat from large scale solar projects. The scale of this project increases the risk of excessive heat in the environment from the solar panels and would only contribute to endangering the ecosystems and therefore the existing climate.</p> <p>I have no experience in the research or monitoring of this heat, however, I have witnessed first-hand the visible heat radiating of another large-scale solar project, similar to the effect you see on a hot day in the desert, radiating of the dirt and sand.</p> <p>This heat should be assessed and considered prior to running livestock under the panels and must be measured from a whole-of-project perspective as to what the impacts are on the environment. We do not want these projects to create “Urban Heat Islands” in what is currently a rural area with healthy and diverse ecosystems and inhabitants.</p>
Soil and Water	<p>Soil and water impacts – it appears only desktop studies have been conducted, this is inadequate given the potential seriousness of the impacts. Erosion, soil microbial losses, risk of dryland salinity occurring etc. Again, this is not my area of expertise, but a very real concern that needs thorough investigation by suitably qualified and experienced independent assessors.</p>
Flora & Fauna	<p>Did the panel inspect the area where the extensive clearing of natural vegetation would occur? To analyse the number of full-grown trees that would be required and to view the habitat existing in this area? The loss of 400HA of biodiversity is not insignificant. It is of great concern. One only has to sit in a space of 10m square of bushland for an hour (during the day and night) to witness the sheer number of species prevalent, the number of birds feeding and nesting, ant and lizard activity, the number of kangaroo and wallaby tracks to water and food, the glider nests, the bat activity, the trees that the koala’s seek out. You don’t need to be an environmental scientist to value the magnitude of this flora and fauna and be concerned about such extensive clearing. Is this absolutely necessary?</p> <p>It is illegal in NSW to collect dead wood from the side of the road for firewood, as these dead branches provide habitats to native flora and fauna, how is it that</p>

Birriwa Solar Project IPC SUBMISSION 13<sup>th</sup> June 2024

	<p>extensive clearing such as this can be permitted by the NSW Government? Especially, knowing that the land area to be cleared in total is much greater than any one project. There are hundreds of projects in the pipeline in NSW – what is the total loss of biodiversity. Can the panel be ensured that this is somehow acceptable? To me, this is further evidence that this particular site is not suitable for this type and size solar development.</p>
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I urge the panel to not grant approval to this project, due to the significant risks as highlighted: biodiversity, social and economical, soil and water, visual amenity, just to name a few. At the very least, approval should be deferred until such time as extensive combined, cumulative and residual impact assessments are conducted for the entire CWO REZ and the detailed findings are made available to the public.

Thank you for the opportunity to provide further feedback regarding this project.