

**Submission
No 140**

**INQUIRY INTO IMPACT OF RENEWABLE ENERGY
ZONES (REZ) ON RURAL AND REGIONAL
COMMUNITIES AND INDUSTRIES IN NEW SOUTH
WALES**

Name: Mr Michael Holz

Date Received: 19 March 2025

RESPONSE - Inquiry into the impact of Renewable Energy Zones (REZ) on rural and regional communities and industries in New South Wales

The Mitchells Flat Solar Factory Experience

Proposed Project

- The proposed solar factory will be located at Mitchells Flat, 10km East of Singleton in the Hunter Valley.
- The solar factory will be 210 hectares (520 acres) in size and consists of 177,000 solar panels and a 90 megawatt battery storage system. Given its size, this is a State significant project requiring State approval.
- Elgin Energy are the proponents of the project and they have indicated that they will run a 14km transmission line along Mirannie and Gresford Road reserves through to an existing substation at Singleton (located near the Hunterview residential estate). Refer image below.



The Mitchells Flat Community:

- Our area and those on our boundary are all rural residential, lifestyle blocks. This is a family community where people have chosen to live and raise their families where there is NO "industrial" activity.
- Singleton Council is currently looking to review minimum lot sizes (i.e. reduce sizes) and there is potential for more residents to purchase properties, build new homes and raise their families in our area.
- Recent examples of similar residential development include the Hunter Highlands estate at Sedgefield.
- Based on the 2021 Census data, Mitchells Flat is home to 242 residents and 66 families. Mitchells Flat shares a boundary with 8 neighbouring rural communities and in total there are 1,632 residents (469 families) that enjoy the peace and quiet of a rural lifestyle in and around Mitchells Flat.
- Everyone will be impacted by either the solar panels or the route of the transmission line through to Singleton (Huntermview residential estate)

Two primary concerns are the location of this project and the broad area of the Hunter-Central Coast REZ.

- It is very important to stress that the Mitchells Flat and the wider Singleton community are not against renewable energy sources and for us this is also not a political / government party issue.
- The community is simply asking that developments (like the proposed solar factory at Mitchells Flat) be placed within the right locations within the Singleton LGA so that they do not impact on either our rural/residential communities or our productive farming land.
- This specific project is planned on RU1 zoned Primary Production land that has great primary production potential. The property was once a productive dairy farm consisting of alluvial creek flats.
- All industrial activity (inclusive of Mining, power generation, industrial estates, Army base etc) are located to the North and West of Singleton with all of the residential development occurring to the East of town.
- Anyone that has visited the Hunter Valley is aware that there are vast areas of Mining rehab and buffer lands to the North and West of Singleton that are ideal for solar projects given the cheaper establishment costs (close proximity to existing electricity grid infrastructure).
- We are already seeing examples of this alternate land use as evidenced by:
 - Malabar Resources' 25MW Maxwell Solar Farm (located on the former Drayton coal mine site)
 - The 400 MW Pumped Hydro plant to be located at Muswellbrook Coal
 - The Stratford Renewable Energy Hub near Gloucester (Yancoal).
- Elgin Energy have made no attempt to engage with any Mining companies in the Hunter and are intent on developing their solar factory in a rural/residential area that will have an adverse impact on our community.
- Our State member (Dave Layzell – Nationals) has attended local community meetings and has also addressed State Parliament and he is totally against the proposed location. Our Federal member (Dan Repacholi – Labor) met local residents in November 2024 and stated that Mitchells Flat is “not a suitable location”.
- On Saturday 8 March 2025, Sue Gilroy (Federal Nationals candidate for Hunter in the upcoming Federal election) visited our area and also commented that our location is not appropriate for a solar factory. She has also since gone on public record that (if elected to Federal parliament) she will:
 - push for the protection of our productive agricultural land
 - review the REZs and the suitability of the locations of renewable energy projects
 - push for a moratorium of all renewable projects and the fast tracking of approvals
 - push for the utilisation of mining rehab land to accommodate renewable energy projects
 - look to hold renewable companies to be responsible for the rehabilitation and remediation of all renewable projects at end of life
- On Saturday 15 March 2025, Emily Suvaal (NSW ALP MLC) also visited our location to see the proposed site first hand and to hear the concerns of local residents. Emily is sympathetic to the issues that we face and mentioned the REZ enquiry that we are now making a belated submission to.
- Emily Suvaal is currently the Chair of the Standing Committee on NSW State Development and she is leading the current Upper House Inquiry into the beneficial and productive use of post-mining land. This inquiry represents a great opportunity for elected government representatives, their various departments, the mining companies, Singleton Council and the community to work collaboratively and make a difference for the Hunter Valley. We need to ensure that renewable projects within the Singleton LGA are located on mining rehab / buffer lands close to existing infrastructure.
- Singleton Council and our community are united in wanting to see former mining land used for renewable projects rather than further impacting on our rural / residential communities and destroying even more productive farming land. In November 2024, Singleton Council voted unanimously against the proposed Mitchells Flat location for a solar factory (refer Appendix 1). Council resolved to write to various NSW Ministers seeking further strategic studies within the renewable energy zone with outcomes being:
 - the development of mapping to provide transparency, clarity and certainty to communities already affected on the best locations within each REZ for renewable projects, and specifically, where State significant renewable projects are not appropriate
 - Amendments to the State Environmental Planning Policy (Resources and Energy) 2021 to include a requirement for all energy projects to obtain a site verification certificate prior to lodging a development application
 - a requirement for a renewable energy bond to ensure any land used for renewables is returned to its pre-used state

- In January 2025, Ausgrid hosted a community drop in session Singleton to share information about their 85 km Hunter transmission line replacement between Muswellbrook and Kurri. Representatives at that session were quizzed regarding the proposed Mitchells Flat Solar Factory project and they were very surprised that anyone would entertain such a project given the lack of electrical infrastructure in that area. The requirement to run a 14km transmission line through heavily timbered and populated areas was questioned especially given the vast areas of land adjacent to the Hunter transmission line. The image below shows the location of the proposed Mitchells Flat Solar Factory and its distance from existing electrical infrastructure.



Appendix A: HCC REZ Geographic Boundary and Infrastructure Route Map

LEGEND

Facilities

- Existing Ausgrid Substation
- Proposed New Substation
- Existing Transgrid Substation or AGL Powerstation

Connections

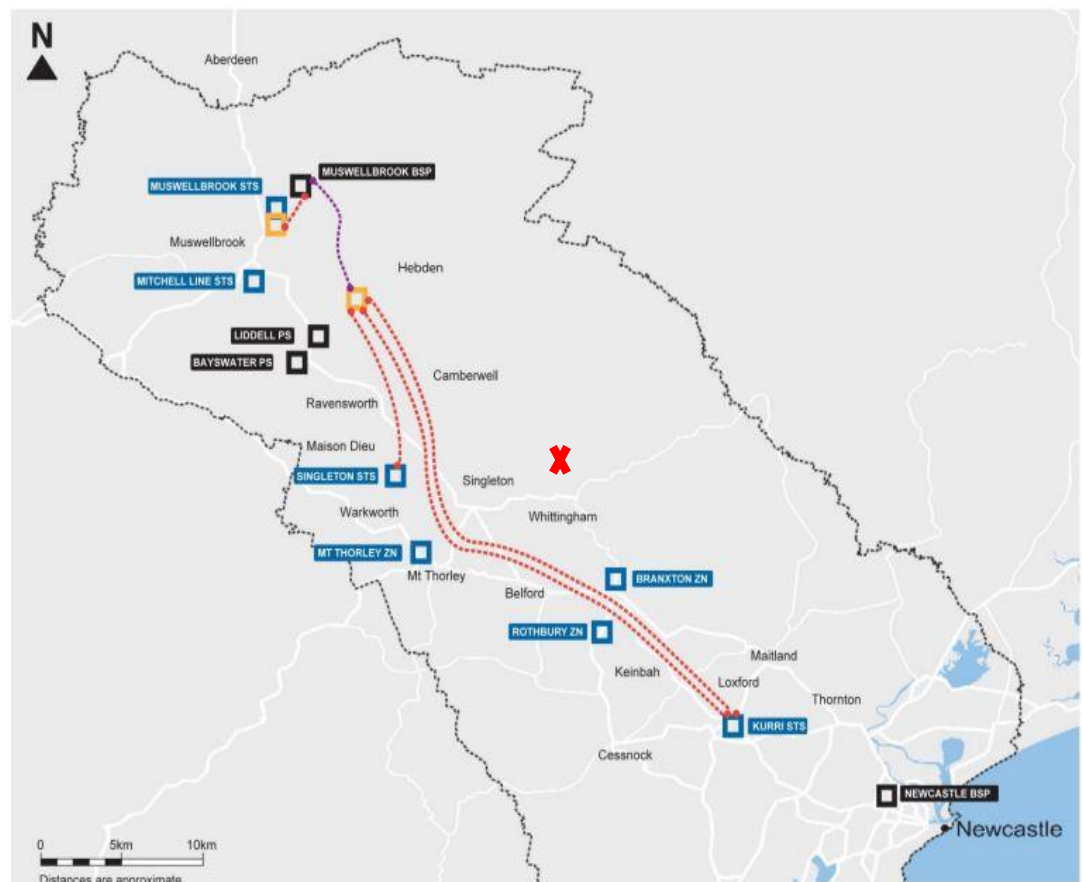
- Proposed power line corridor to be rebuilt
- Proposed communications cable to be installed within power line corridor

Boundaries

- HCC REZ Boundary

✗ **Mitchells Flat**

The proposed Mitchells Flat Solar Factory will be located to the East of Singleton. It is proposed that a 14km transmission line will be constructed through heavily timbered and populated areas.



- The community has major concerns with the blanket nature of the State Government's Renewable Energy Zones (referred to as the REZ's) that have been placed across the Hunter Central Coast region without any consideration of the suitability of proposed sites for large solar developments.
- The REZ's currently include rural / residential zoned land and, as a result, we now have solar companies wanting to place large solar factories right in the middle of our rural communities and farmlands.
- Governments (whether it be Federal / State or Local) need to re-assess the approvals process and the blanket nature of these REZ's so as to ensure that these types of developments do not impact on our rural / residential communities and our productive farming land.

Other Community Concerns with the proposed solar Factory

- Visual amenity and landscape impact with 177,000 solar panels adjacent to the main Gresford Road.
- The bushfire hazard given the fuel load under and between the solar. There is a high risk of roadside ignition at this location and potential for rapid fire spread. The RFS will not access the site to extinguish a fire.
- Major storm event. There is recent history of a mini-hurricane at Mitchells Fat in 2018 with a house demolished and numerous insurance claims for damaged property. If panels are broken / damaged then there is a very high risk of heavy metals such as cadmium leaching into the soil and into the West Brook and Glendon Brook. The management of environmental impacts including run off is critical as the contaminants from both creeks would feed directly into the Hunter River and impact all of those downstream.
- Who is responsible for the end-of-life decommissioning and rehab of the site as this will be a massive cost? In NSW, substantial rehabilitation security bonds are required for mining industries but not for solar energy companies. Communities will potentially be left with significant end of life rehabilitation costs.
- Livestock Production Assurance scheme declaration regarding animals having access to solar panels. This declaration is required every 2 years and now includes Question 2.8 requiring access to be restricted and this has a direct impact on adjacent neighbours. Barnaby Joyce has raised this in Federal Parliament.
- NSW Farmers Federation has highlighted the issue of neighbouring property insurance premiums increasing and issues with obtaining public liability insurance.
- Impacts on Mental health/emotional wellbeing/sense of place. Some residents adjacent to the property have farmed their land since the 1850's. Other neighbouring ancestry's dates back to the early 1900's.
- Impact on neighbouring property values because of the solar factory project location.

Conclusion

- In summary, the Singleton Community is looking for greater clarity and transparency with regard to the consideration of future renewable projects.
- Specifically we are looking for a more coordinated approach in dealing with new projects to ensure that infrastructure is placed in the most appropriate locations to minimise impacts on our communities and our productive farm land.
- Finally we would like to highlight the excellent submission from Singleton Council (No 40 dated 31 January 2025). We fully support Council's submission and hope that our concerns are addressed in this Enquiry.

Submission No 40

INQUIRY INTO IMPACT OF RENEWABLE ENERGY ZONES (REZ) ON RURAL AND REGIONAL COMMUNITIES AND INDUSTRIES IN NEW SOUTH WALES

Organisation: Singleton Council
Date Received: 31 January 2025

MM4/24 Mayoral Minute - Renewable Energy Zones

FILE:24/00008

The Hunter Central Coast Renewable Energy Zone (REZ) was formally declared by the then Minister for Energy under section 19(1) of the *Electricity Infrastructure Investment Act, 2020* and published in the NSW Gazette on 19 December 2022.

The declaration of the REZ established EnergyCo as the Infrastructure Planner responsible for coordinating the development of the REZ. It also sets the intended network capacity (size), geographical area and infrastructure that will make up the REZ. There are several additional functions that EnergyCo undertake, including access schemes and network solutions to facilitate the delivery of electricity into the broader electricity grid and market.

The REZ has existing 132 kilovolt (kV), 330kV and 500kV transmission infrastructure and will be critical to delivering electricity to the broader Newcastle, Sydney and Wollongong population areas. Augmentation of this network to a capacity of 1 gigawatt (GW) is required to cater for expected growth in renewable generation projects. This increase will deliver up to 8GW of additional transfer capacity from inland REZs (including the Central West Orana and New England) to support decarbonisation of existing industries in the Hunter Central Coast region.

The REZ is expected to support significant growth in solar, wind and pumped hydro projects as well as battery storage and transmission infrastructure to underpin growth in new low carbon industries and the transition of existing industries towards achieving the Federal and State Government targets of net zero by 2050.

The Singleton local government area sits in the middle of the Hunter Central Coast REZ and as a result has started to see an increase in renewable energy projects including the Hunter Transmission Project, the Bowmans Creek Wind Farm (Stage 1 and Stage 2), the Maison Dieu Solar Farm and the proposed Mitchell's Flat Solar Farm. It is expected that the increase in renewable energy projects and transmission infrastructure will increase as the REZ develops.

Singleton Council recognises the impacts of such developments in our LGA and the importance of a coordinated, transparent and consistent approach to new development. In its submission to the draft Energy Policy Framework earlier in the year, council recognised that consideration of the cumulative impacts of these developments within and across local government areas is critical to the success of the REZ. These cumulative impacts will affect housing, infrastructure, water demand, waste services, emergency response as well as transport routes and how energy is stored for transmission.

Specifically, Council called for a coordinated approach to the need for and capacity of energy transmission for new projects to ensure infrastructure was located in the most appropriate locations to minimise impacts on community and Council's own infrastructure (including road reserves).

To support this, at the 15 October 2024 Council Meeting, Council resolved to support three motions to the LGNSW Annual Conference regarding the renewable energy impacts to communities. These included:

1. That LGNSW requests the NSW State Government finalises the draft Energy Policy Framework to require all proponents of renewable energy development to

- consult with the Local Government for the area in which the proposed development lies prior to conducting any community consultation.
2. That LGNSW requests the NSW State Government to conduct further strategic studies regarding appropriate locations of renewable energy projects within the renewable energy zone.
 3. That LGNSW advocate for Local Councils to the NSW State Government to provide appropriate funding for local councils within the Renewable Energy Zones to complete rural land use and other strategies to support the local councils ability to:
 - Engage with renewable energy development proponents strategically in the first instance, to develop appropriate community consultation plans
 - Provide clear land uses permissible under the State Environmental Planning Policy (Transport and Infrastructure) 2021 and Standard Instrument Local Environmental Plan to now include reference to the renewable energy zone and appropriateness of renewable energy types within specific locations across NSW
 - Require renewable energy proponents to commit to an environmental management bond to ensure the land is returned to its pre-use state (or other defined future state)

The Mitchell's Flat Solar Farm

Whilst acknowledging that this project is in its early stages of development, the proposed Mitchell's Flat Solar Farm is an example of the issues identified above. The project is proposed in a policy vacuum that creates uncertainty and lacks transparency. Importantly, the proposed project is seeking to install high voltage transmission lines over 14 kilometres within the road reserve along several roads including, but not limited to Gresford Road and Mirannie Road. The extent of clearing for the transmission line would have significant impact on an identified Endangered Ecological Community. The area of the proposed transmission line is located within an area of core flora and fauna connectivity.

The proposed project is located on land that is mapped as Biophysical Strategic Agricultural Land. Whilst this doesn't preclude development, it requires a level of assessment ahead of lodging a development application to ensure appropriate protection of significant agricultural value occurs.

Whilst the strategic agricultural land map for the Upper Hunter identifies this land as Biophysical Strategic Agricultural Land, unlike coal mining and coal seam gas developments, there is no statutory requirement for renewable energy developers to obtain a site verification certificate for renewable developments on strategic agricultural lands.

Had the matters raised above been introduced prior to the commencement of the Mitchell's Flat Solar Farm, they would have provided a higher level of transparency, allowed the community to participate in the strategic decision making around developments that may affect them and provided independent oversight of the impact of development on strategic agricultural lands.

In considering advice on this proposed project, Council must also consider impacts to

our own infrastructure as well as community concerns. As this is one of many proposed projects in the LGA, it is important that these impacts are considered cumulatively and in context with surrounding land uses.

155/24 **MOVED** Cr S Moore, Mayor **SECONDED** Cr H Jenkins that Council:

1. Oppose the site of the proposed Mitchell's Flat solar farm due to the proximity to numerous dwellings, potential fire risk and potential insurance increases; and
2. Staff delegations relating to Section 138 of the *Roads Act, 1993* for the installation of private infrastructure for energy production and other large projects in the Singleton LGA road reserves be withdrawn and determination to be by the elected Council; and
3. Should a development application for the proposed Mitchell's Flat solar farm be lodged, request an opposing submission be drafted for Council endorsement prior to submission to the Department of Planning, Housing and Infrastructure, Urbis, and Elgin Energy; and
4. Resolves to write to the Minister for Planning, Housing and Infrastructure, the Minister for the Environment and the Minister for Energy seeking:
 - a. Further strategic studies within the renewable energy zone; with an outcome being the development of mapping to provide transparency, clarity and certainty to communities already affected on the best locations within each REZ for renewable projects, and specifically, where State significant renewable projects are not appropriate; and
 - b. Amendments to the State Environmental Planning Policy (Resources and Energy) 2021 to include a requirement for all energy projects to obtain a site verification certificate prior to lodging a development application as well as a requirement for a renewable energy bond to ensure any land used for renewables is returned to its pre-used state (or other defined best use state); and
5. Resolves to seek a meeting with the Mayor, Councillors, General Manager and the Minister for Regional Transport and Roads, the Hon. Jennifer Aitchison MP, to discuss road related matters associated with REZ projects and the potential impact on local communities and councils.

CARRIED