

**Submission
No 142**

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

Name: Peter Reardon

Date Received: 11 May 2025

**SUBMISSION TO THE INQUIRY INTO THE IMPACT OF RENEWABLE ENERGY ZONES
ON RURAL AND REGIONAL COMMUNITIES AND INDUSTRIES IN NEW SOUTH WALES**
From: Peter Reardon, Affected Landholder – Geurie, NSW

1. Submitter Details

Age : 61. Owner of the land and resident for nearly 25 years

2. Project Information

Project Name: Boree Solar Farm

Proponent: Venn Energy Pty Ltd

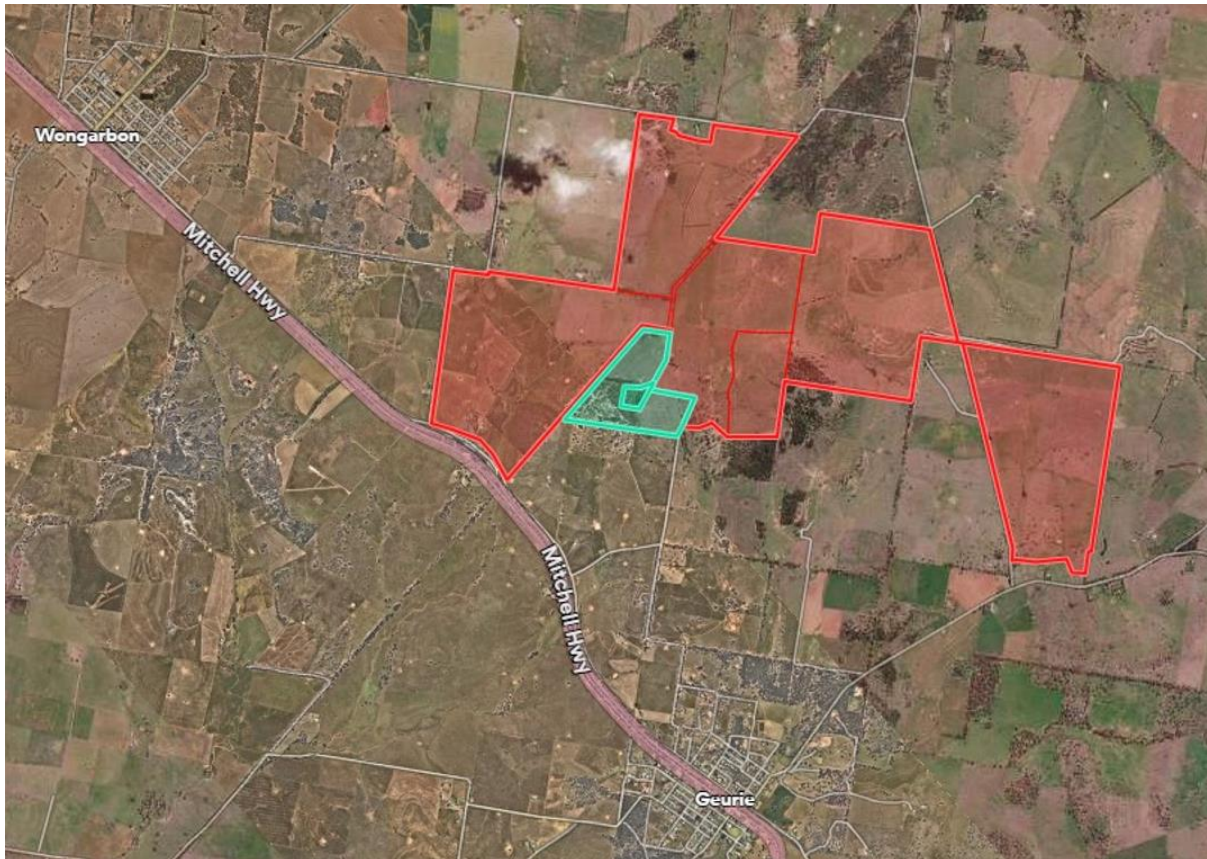
Location: Geurie, Central West Orana REZ, NSW

Distance to Infrastructure: Approximately 300 metres from my residence

3. Introduction

I make this submission as a directly affected landholder in Geurie, NSW, in relation to the proposed Boree Solar Project being developed by Venn Energy Pty Ltd within the Central West Orana Renewable Energy Zone (REZ). The proposed development borders my 200 acre property and has already caused significant disruption to my peace of mind, myself and family's mental health, land use security, and broader community cohesion. The project area is on 5 of my 6 boundary fences, with the nearest only 40m from my home. This is NOT fair and reasonable. (Please refer to my original correspondence with the proponent attached).

The RED zone is the proposed project area. The GREEN area is my farm. There are many impacted neighbours – two in addition to me are bordered on three of four sides as well. The sheer scale, size and complexity of the RED project area at a glance in this picture tells the story of why the little towns of Geurie and Wongarbone are **against** this project.



My engagement with the project to date has been met with vague, dismissive, and often misleading responses from the proponent and its consultants. These experiences are not isolated but part of a growing pattern of poorly managed consultation under the REZ framework. This submission outlines how the current REZ rollout model, particularly for State Significant Developments (SSDs), is failing rural communities—compromising landholder rights, eroding trust in regulatory systems, and fuelling division across close-knit regional areas.

The key terms of reference that apply include (but not necessarily limited to):

(a) current and projected socioeconomic, cultural, agricultural and environmental impacts of projects within renewable energy zones in New South Wales including the cumulative impacts

Prime agricultural land is being removed from the farming landscape. It is not just the % of land, it is the number of viable farms. The proposed Boree project will take out 4 viable farms from the farm pool, reducing the ability to manage biodiversity and be available for the younger generation of farmers. These highly productive agricultural farms will not be available for decades. This reduces the ability for the younger generation to learn and apply farming techniques and keep producing food and fibre for the citizens of Australia.

There have been no evidence based assessments on the cumulative socioeconomic effects on all these projects compounding on small communities. The original number of REZ projects has ballooned out of control with no clear regulation, governance nor end point.

These developments are not environmentally sustainable. They are destroying land pastures and harming the biodiversity of the areas including those adjacent areas. My property has a large hill with mature, old gum and ironbark trees - one of the last in the whole area. It is a part of the wildlife corridor from Burrendong to the Macquarie marshes. Wildlife will be "boxed in" on three sides by 10ft security fencing, and will not be able to migrate or pass through these sheltered refuges.

(b) current and projected considerations needed with regards to fire risk, management and containment and potential implications on insurance for land holders and/or project proponents in and around Renewable Energy Zone

My home is boxed in by the project so there will be no means of escape from a bushfire because of the security fencing around all sides of the project area.

My family is at direct threat of this facility.

This should have been worked out at the site selection stage and not back-analysed and justified in the SEARS / EIS. The site selection does not meet the government's own guideline : **Large-Scale Solar Energy Guideline (August 2022, updated November 2024)**

(g) projected impact on visitation to regional areas with renewable energy zones resulting from changes to land use

As part of my retirement (I am 61 years old), I have started to develop an eco-farm retreat with mobile mini homes (within the guidelines provided by government). Once my eco-retreat is surrounded by a power generation facility, this will greatly reduce the attraction of visitors to the area and will significantly impact the financial viability of my self-funded retirement. Visitors want to see the pristine landscape and views around Geurie and immerse in the bushland and wildlife. This will not be possible when this facility is constructed.

(i) adequacy of community consultation and engagement in the development of Renewable Energy Zones, and associated projects

The majority of the angst at the moment (see below) is because the proponent is not adhering to any standards expected with respect to consultation. They are doing the bare minimum and making a mockery of the whole process. There is no governance at this stage.

(j) how decommissioning bonds are currently managed and should be managed as part of large scale renewable projects

If a mining company put forward an application for a mine site without a clear site closure plan, rehabilitation plan and significant bonds up front, they would not even be considered let alone approved. It is our understanding that allowances are not made by the proponent until 5 years from the end of the project (which could be 25 years away). These companies may go broke, seel or “flip” the asset or not adhere to their commitments leaving the government of the day and taxpayers to rectify the damage done.

We call for the same level of due diligence and governance expected of other developers (such as miners) so it is consistent.

4. Key Issues Arising from the Boree Solar Project

The consultation process doesn't meet the *Quality Assurance Standard for Consultation and Stakeholder Engagement (IAP2)*

A. Exclusionary and Disingenuous Consultation Practices

The consultation process for the Boree Solar Project has been fundamentally flawed from the outset. Despite the project's direct proximity to existing homes and agricultural operations, the only official notification many residents received was a single, generic letter—sent without tracking or verification—on 28 March 2025. This letter:

- Was designed in a way that closely resembled junk mail, leading to the risk of it being overlooked or discarded;
- Lacked any visual clarity or detailed mapping to help recipients understand their property's proximity or relevance to the project;
- Contained no information on how to engage, object, or request more detail;
- Was not followed by any personal contact—no phone calls, door knocks, or in-person engagement from either Venn Energy or its consultants;
- Made reference to the project “moving into the next stage of planning,” subtly implying approval and undermining the community's right to object or shape outcomes.

The proponent later claimed that briefing sessions were offered to residents within 2km of the project boundary, but this critical eligibility detail was never disclosed in the original communication—leaving many confused and excluded.

Such an approach is not just poor practice; it directly contradicts the NSW Government's SSD and REZ consultation expectations. This failure to engage transparently with those most affected constitutes a breach of good faith and undermines the legitimacy of the entire planning process.

B. Flawed and Biased Community Survey

Following this inadequate notification, the proponent released a digital-only community survey that was riddled with bias, omissions, and structural flaws. The survey:

- Was presented using loaded, promotional language (e.g., “enhancing sustainability” and “ensuring energy security”) that framed the project as inherently beneficial;
- Provided restrictive answer choices (e.g., limited three-point scales), leaving no room for dissent, strong objections, or nuanced feedback;

- Excluded essential issues such as:
 - Agricultural land loss and productivity concerns;
 - Bushfire risk and insurance implications;
 - Potential property devaluation;
 - The risks and unknowns surrounding battery energy storage systems (BESS);
 - The impact of construction and project uncertainty on mental health;
 - Toxicity and decommissioning of solar panels;
 - Cultural heritage values and land access restrictions.

The survey's digital-only format excluded many rural residents who lack reliable internet. Community members were forced to replicate the survey by hand and collect 39 hard copy responses independently—highlighting a complete failure of the proponent to accommodate rural communication realities.

Despite repeated, formal requests for the survey to be revised and reissued in an accessible and unbiased format, Venn Energy has refused to do so. This decision is a clear indication that the proponent is not interested in genuine community feedback—only the illusion of consultation. It is very disingenuous. Venn refused to do any group or community sessions so we organised and held our own. Venn were invited but refused to attend. Below is myself addressing the concerned and interested community members who attended on the 27 April 2025 (with only a few days' notice). The Mayor, Deputy Mayor and some counsellors from the DRC, The Hon Mark Banasiak MLC (Chair of the REZ Enquiry) and Andrew Gee MP (re-elected Independent to Calare – our area) were all in attendance providing support.



C. Lack of Transparency and Withholding of Critical Information

Venn Energy’s approach to information provision has been equally problematic. As of the date of this submission, the project website remains a barebones holding page that fails to meet even the most basic expectations for a project of State Significant status.

- There is no high-resolution, labelled site map;
- No Frequently Asked Questions (FAQ) section;
- No visible project timeline or milestone tracking;
- No dedicated complaints or contact form;
- No Stakeholder and Community Engagement Plan (SCEP).

At the face-to-face briefing session—organised only after political intervention—staff from Ethos Urban and Venn Energy were unable to provide adequate responses to straightforward questions about site layout, construction staging, or proximity of infrastructure. When I requested meeting notes, I was told they would not be shared with participants, contradicting basic principles of transparency and violating IAP2 and NSW DPIE guidelines for engagement. They forwarded some notes later that were not sufficient.

This secrecy and defensiveness only serve to heighten community mistrust.

D. Psychological, Social and Community Impacts

The psychological burden of this project on nearby landholders cannot be overstated. The perception that the development is inevitable, combined with the dismissive nature of proponent communications, has caused severe anxiety, division among neighbours, and stress in rural households already managing drought, biosecurity, and rising living costs.

No mental health support has been offered by the proponent. No recognition of these impacts has been made in public-facing materials. There is no pathway for residents to raise these issues in a safe, supported environment. This neglect is ethically unacceptable and completely at odds with best-practice principles for community engagement.

E. Generic, Deflective, and Non-Responsive Communication

The written responses issued by Venn Energy and Ethos Urban to date have been tokenistic, evasive, and boilerplate. While the language is superficially polite, it fails to:

- Address specific questions;
- Commit to any corrective actions;

- Demonstrate that feedback has had any influence on the Scoping Report or project direction.

This includes the proponent’s refusal to attend a community information forum hosted by the Deputy Mayor of Dubbo Regional Council, and their continued silence when contacted by media outlets seeking comment. This level of disengagement is wholly inappropriate for a proponent operating under the State Significant Development framework.

F. Total Absence of a Complaints Handling System

Venn Energy has not implemented any formal complaints process. There is:

- No published procedure for logging complaints;
- No designated contact point or timeline for response;
- No publicly accessible complaints register or audit trail;
- No assurance that feedback will be addressed in the EIS;
- No Stakeholder and Community Engagement Plan available.

This absence of accountability mechanisms breaches expectations outlined by the Australian Energy Infrastructure Commissioner and is inexcusable for a project of this classification.

5. Broader Concerns with REZ Implementation

The Boree Solar Project reflects broader structural failures in how REZs are being rolled out across NSW. Key concerns include:

- **No cumulative impact assessment:** Multiple projects are being assessed in isolation, ignoring the combined effects on fire risk, emergency access, infrastructure strain, and land use compatibility;
- **Lack of regional planning balance:** There is no overarching strategy to protect agricultural land, manage biodiversity values, or guide long-term land use;
- **Privileging of speculative developers:** Long-term landholders and regional industries are being disregarded in favour of short-term commercial gain from external developers.

The current model risks irreversible damage to the social fabric, economic viability, and environmental values of rural NSW communities.

6. Timeline of Key Events

- 4 April 2025: Initial email to Venn Energy
- 7 April 2025: Face-to-face meeting arranged after intervention by MP Dugald Saunders
- 8 April 2025: Notification concerns raised on-site
- 14 April 2025: Formal complaint submitted by Renee Harrison
- 17 April 2025 : email received from Venn Energy post interview - less than adequate summary of meeting and no resolution of concerns raised
- 28 April 2025: Complaint issued to Venn Energy (receipt acknowledged but not addressed)
- 29 April 2025: Further complaint submitted
- 30 April 2025: Single, generic response received
- 2 May 2025: Complaint regarding failure to share meeting notes
- 6 May 2025: Proponent notifies Geurie residents in writing that the community survey will not be re-issued

To date, no detailed or corrective response has addressed these concerns.

7. Supporting Evidence (Additional Available on Request)

- Copy of original notification letter and envelope
- Formal complaint letters (14 and 29 April 2025) - includes information on previous emails to Venn (eg) paper copies of community surveys, number of signatures to petition(s) against the project (>1000)
- Analysis of consultation responses
- Supporting emails and images
- <https://www.facebook.com/groups/1181634050354627> - support for our concerns against this project (approaching 800 members)
- Video of Dubbo Regional Council meeting where Clr Jen Cowley (clrjen.cowley@dubbo.nsw.gov.au) first raised the issue at council regarding the angst in the Geurie community

- <https://www.facebook.com/share/p/15Ks82Uyrr/> - 7 News article regarding the Geurie community meeting. Venn declined to attend or be interviewed
- <https://www.facebook.com/share/p/1FZzGtVN7P/> - Land Newspaper article on the project. Venn declined to be interviewed
- <https://www.facebook.com/share/p/15L1kjq9aU/> - ABC Radio interview. Venn declined to be interviewed
- The AEIC has already been copied into a majority of the emails to Venn Energy regarding these matters.
- A complaint has been registered with the AEIC and case manager assigned to us/me

Note that all this evidence of concerns and objections have been collated within 5 weeks of the initial letter from the proponent. This indicates the high level of dissatisfaction with the proponent at such an early stage of the proposed project.

8. Pattern of Poor Practice – Venn Energy

This is not an isolated case. Other Venn Energy projects have reported similar failures:

- **Cooba Solar Project (Victoria):** <https://coobasolarproject.com.au/>
- Contact: Claire Tuohey

- **Lambruk Solar Project (Tamworth, NSW):** <https://lambruksolarproject.com.au/>
- Contact: Karen Fox

Please feel free to contact the coordinators above to obtain more evidence of the repeated inadequacies by this proponent.

Community representatives from both projects have raised red flags about poor consultation, inadequate mapping, and a dismissive proponent culture.

9. Project Site Selection

Landholder land access agreements have been on place for up to 3 years (for the four properties in the RED Zone) but there has been no consultation with nearby affected holders such as myself. This is in contravention of : ***NSW Department of Planning and Environment, Draft Private Agreement Guideline, Nov 2023, Section 3.1 General Guidance.***

Many of the directly impacted and adjoining neighbours, including myself, did not get informed about this project until 5 weeks ago. In the last few years there have been properties bought/sold and other decisions to keep investing on their farms. If this information was available at the time, some of these decisions would be significantly impacted by the fact there is a proposed 3000 acre solar installation next door.

The site selection process does not meet: ***Large-Scale Solar Energy Guideline (August 2022, updated November 2024):***

The site has been selected for a significant amount of time, and no engineering reports or studies have been provided by the proponent to demonstrate that the site selection meets the government's own standards. It is not good enough for the proponent to say that this will be assessed at the next stage (SEARS/EIS) because the site has already been selected. The SEARS/EIS can NOT be used to back-justify what has already occurred.

The Dubbo Regional Council (DRC) is a stakeholder and given the size and complexity of the project, should formally be a part of the scoping study but they have not been actively engaged by the proponent. To date the proponent has not been able to detail anything of the following that is of relevance to DRC:

- Use of local access roads to/from Wongarbron and Geurie and surrounds - narrow, unsealed, dangerous bends and crests, traveling through both Wongarbron and Geurie, past schools etc.
- Access to services - water, power, communications
- Interactions with Mitchell Highway - turn off lanes, passing lanes, railway crossings

10. Recommendations to the Inquiry

I respectfully request that the Committee:

1. **Pause non-compliant projects**, including the Boree Solar Farm, until all deficiencies are corrected to a transparent, accountable standard.
2. **Formalise protection of the community and agricultural land** from unsustainable development:
 - Consider 10km exclusion zones from the boundary of small towns and villages for large, complex facilities similar to the Boree project
 - Consider legal protection against the use of prime agricultural land for these industrial facilities
3. **Mandate minimum standards for consultation** under REZ-based SSDs, including:
 - Physical and digital distribution of notices;
 - High-resolution maps and visual aids;
 - In-person briefings for all affected landholders;
 - Inclusive, unbiased surveys with hard copy options.
 - The proponent verifies that all impacted people within 10km of the project area are informed and included directly in the consultation process – not just a letter by post and think that is sufficient. There needs to be a follow up verification by various means of communication channels to ensure all socioeconomic persons are contacted
4. **Require independent audits of community engagement** before any SSD progresses beyond the Scoping stage.
5. **Require council consent and support** prior to approval of the project
 - Legislation is being considered in Queensland that provides for more direct involvement and consideration of the local councils prior to project approvals
 - Local councils act for and on behalf of their citizens so should have significant weight on the decision making process

6. Require proponents to provide a detailed report and supporting studies that details how the site selection meets the requirements of : ***Large-Scale Solar Energy Guideline (August 2022, updated November 2024)***

7. **Ensure all project websites must include:**

- Labelled maps;
- FAQs;
- Project timelines and contact details;
- A formal complaints handling system.

8. **Undertake a full cumulative impact review** of all projects within a 20km radius of communities in REZ areas (eg) Geurie and Wongarbon communities combined.

9. **Introduce enforceable consent safeguards**, such as:

- Veto rights for immediately adjoining landholders;
- Cooling-off or remediation periods following engagement failures
- Proponent has to secure the buffer zone around the outside of these projects and not use neighbours as part of the buffer zone without consent or safeguards

10. Conclusion

The Boree Solar Project is a textbook example of how NOT to engage rural communities in the energy transition. The proponent has failed to uphold even the most basic principles of respectful, inclusive, and transparent planning.

Without urgent reform, the REZ model will continue to alienate communities, damage livelihoods, and provoke justified backlash. I urge the Committee to hold proponents accountable and demand a higher standard for future developments.

My mental health has been severely impacted including my family. Every time I look out from my veranda and see my neighbours fence – the RED ZONE (40m away), I visualise thousands of solar panels and 10ft security razor wire security fences on all three sides around my home like a prison yard....and cry. It is NOT fair and reasonable, and does not pass the pub test.

I am available to provide further information or appear in person before the Committee.

11. Consent

I grant permission for this submission and my contact details to be shared with Venn Energy, Ethos Urban, and other relevant parties as required to assist with inquiry and resolution.

Signed:

Peter Reardon

Long Term Geurie Resident and “boxed in” on three sides by the Boree project area

11 May 2025