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NTEPA

Via <https://ntepa.nt.gov.au/consultation/make-a-consultation-submission?id=1566984>

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To Whom it May Concern,

Thank you for the opportunity to communicate my concerns about the environmental impacts of building the massive SunCable Precinct in the proposed location on Muckaty Station.

I want to see the NT transition to renewable energy but the impacts of all industrial developments must be minimised. Costs to the environment are not justifiable to minimise costs for developers.

ISSUE	WAYS TO MINIMISE NEGATIVE IMPACTS
<p>Unchecked growth in demand for energy makes:</p> <ul style="list-style-type: none">• any kind of supply unsustainable• claims that such precincts are part of a transition unconvincing (we are just adding massive expansion of solar to massive expansion of gas here in the NT, there clearly is no transition planned)	<ul style="list-style-type: none">• Take urgent comprehensive all of government action to reduce demand for energy
<p>Installation of a huge number of solar panels which take up a lot of space. Clearing of native vegetation (where required) destroys ecosystems, causing widespread death of plants and animals, loss of threatened species and greenhouse gas emissions.</p> <p>This site is especially problematic involves clearing a bilby stronghold. The case for this has not been justified and the impacts on bilbies is shamelessly understated in the proposal.</p>	<ul style="list-style-type: none">• Site selection<ul style="list-style-type: none">○ Install panels on land that is already cleared.○ Avoid areas with threatened species• Agri-solar generation is recommended by the Clean Energy Council. <p>I just drove from Charters Towers to Cloncurry – almost all the land between these two locations is completely cleared and full of nothing but weeds.</p>

	<p>I understand country that is not being used for industrial purposes is seen by some as wasted, but this is not the case – such country is offers the only true hope for future resilience.</p> <p>I also understand pastoral lease holders are difficult to deal with, but at the end of the day they are on public land and their interests should not override what is best for the NTs future.</p>
Some solar power plants require large amounts of water for cleaning solar collectors and concentrators or for cooling turbine generators.	Design, operations and maintenance must minimise water consumption
Production of huge number of solar panels which require material such as metals and glass that are energy intensive to make, have a finite lifespan (around 35-40 years) and will become waste	<p>Recycling must be mandatory</p> <p>www.energy.gov/eere/solar/end-life-management-solar-photovoltaics</p>
Some solar cells use hazardous chemical and heavy metals. This creates risks of toxic waste streams and environmental pollution	Strict planning and regulation of waste handling
Mining of non-renewable rare earths has significant negative environmental impacts and produces large amounts of toxic waste ⁵ .	Ensure suppliers of rare earths follow best practice and are strongly regulated
<p>Solar farms are recognised as having major and complex impacts on bird, bats and insect communities.</p> <p>Native vegetation and proximity to Lake Woods makes Muckaty an especially bad site choice and has not been adequately justified by the proponents.</p>	<p>Detailed investigations to understand local issues</p> <p>Implement strategies to minimise risks</p> <p>Choose already degraded areas to minimise impacts</p>
Impacts on waterways and receiving wetlands (Lake Woods) from changes in flow intensity and transport of sediment, pollutants and spread of weeds	<p>Site selection:</p> <ul style="list-style-type: none"> • Avoid water courses • Locate in the upper part of the catchment. • Avoid locations of high conservation value (this site drains towards Lake Woods, a wetland of international Conservation Importance) • Design measures like buffers and site layout

	<ul style="list-style-type: none"> Operational measures – e.g. weed hygiene, monitoring, environmentally friendly cleaning products
<p>Impacts from power delivery systems. Powerlines</p> <ul style="list-style-type: none"> Installation involves land clearing causing loss and fragmentation Hinder animal movement Causes changes in microclimates Noise pollution Impact archaeological and cultural heritage, soil and water erosion and are associated with spread of weeds. <p>https://eecs.uq.edu.au/files/24307/00_Summary_Report-1.pdf</p>	<ul style="list-style-type: none"> Locate close to demand point Co-locate with other 'linear infrastructure' Carry out rigorous environmental impact assessment

The planned location is too close to Lake Woods, the ecosystem is relatively intact and is home to threatened species including the greater bilby, grey falcon and yellow spotted monitor.

- 1. This project should be built on already cleared land, and especially not in threatened species habitat and close to international significant wetlands.**
- 2. The project needs to be subjected to the highest level of environmental impact assessment by the NT EPA with opportunities for public input.**

Regards,



Jacqueline Arnold