

Richard Downes , S9, Sunhill Dairy, Dad- 645 The Gap Rd Salisbury Plains – Approx 6km East of Uralla

Objections to The ‘New England Solar Farm’ Development -Approx. 6kms East of Uralla

Attn – To all that it concerns (My apologies if I’m over 9500 characters)

This first page is an email received by Sunhill on the 4/2/2018.

Hi Corinne and Richard,

Further to my previous email at the end of last year, I wanted to provide you an update on the New England Solar Farm and respond to the most recent communications we have had with respect to the neighbour agreement negotiations.

Firstly, in response to your feedback relating to the vegetation proposed to screen views of the southern array from the Sunhill property, we have moved the southern vegetation screen closer to your property boundary, so that it is now proposed along and adjacent to this boundary. This has increased the effectiveness of the screen and will be illustrated in the Environmental Impact Statement.

Secondly, we have noticed you have been strongly objecting to the project via social media and in the news. We completely respect your right to object to the project, and in fact feedback on the project is encouraged. However, some of the public comments have included what UPC and EMM believe to be misleading information, such as inaccurate representations of the proposed project layout and a perceived lack of community consultation, that seems contrary to the discussions that have been held with you and the broader community since early 2018. I hope you can appreciate it is very difficult to negotiate a neighbour agreement unless both parties are open and honest in their communication and willing to act in good faith.

UPC have therefore asked me to convey that they are not in a position to continue discussions regarding the options you have put forward under the current circumstances. However, please let us know at any time if you would like to resume the negotiations on these terms. UPC are happy to do so.

As promised I will let you know when the Department of Planning and Environment place the EIS on public exhibition. Feel free to get in touch with me if you have any further questions in the meantime.

Kind regards,

Nicole

Nicole Armit

Associate Director – Environmental Assessment & Management

The Objections.

It is with a heavy heart that I object to this development proposal. I had always expected the renewable revolution to be rolled out and championed by decent clear headed people/companies.

My initial objections were in fact limited to the effect, inconvenience etc that this development posed directly to me personally, my family and my business. These of course still stand.

Not one of the involved landholders in the southern array approached myself, my wife nor my business in relation to the investigation of a lge scale solar project being developed. Whilst this appears not to be a legal requirement it is noted in the (wind farm guide for host landholders) pg31 that this has been found to be the 'best approach'. I have been disgusted by UPCs approach which would appear to be more of a 'divide and conquer' mentality. For such a young industry it is appalling that developers are allowed to behave in this manner. Furthermore the level of support for 'affected' parties has been overwhelmingly lacklustre. WHO DO YOU CONTACT? When S9 was first contacted by UPC the large scale solar development guidelines were in fact still in draft form. Similarly there was no large scale solar development commissioner to offer advice. SUNHILL (S9) now holds the rather dubious honour of being the first large scale solar complainant in NSW.

Over the ensuing 13 months it has become more apparent (particularly in the southern array) that the proximity to waterways, use of BSAL land, proximity to other dwellings, unaddressed potential impact to wildlife, lack of identification of ALL affected landholders and placement on an iconic tourist route leaves this development as financially positive (for some) but seemingly unnecessary from a 'solving the nation's energy crisis' point of view.

I am completely aware that the entire New England area has been identified as a renewable hot spot zone. In saying this, I fail to see why/how proposing to surround a 12ac residential/ commercial block of land on 3 sides can even be considered. Surely there is enough land throughout this region, still within proximity to the grid, still relatively flat and still boasting all the altitude/solar irradiance benefits that are being sought. That aside, IF a fully exhaustive search has been done and there is no other choice available then surely some form of compensation/s should follow. S9 has been a functioning residence, dairy, cosmetic manufacturer and tourist destination for over 9 years. It is as though we are simply being told shut up, bend over and 'take one for the team'.

It also disgusts me that a developer with the depth of experience that UPC purports only lists 3 alternatives . The first being rather defeatist in 'do nothing'.

It is also astonishing that for a development of this size (720MW) to have not drawn the attention it deserves and for **the relevant minister to have not called for a public meeting**. Largely the SSD solar developments I have seen proposed and approved in NSW have been in the order of 100MW.

Consultation, Negotiation.

1. See Email PG 1. This is highly indicative of how this developer has behaved in regards to S9. The fact they note that this 'seems contrary' highlights the amount of attention they have paid.
2. I would further go on to say **very little** negotiation has gone on. It was reiterated to the developer of several occasions that to surround a property on 3 sides (and a close 4th) is completely 'unfair and unreasonable'. This was also highlighted to us by a staff member of the DPE. I understand the significant reduction in the southern array. It's all I hear about. Throughout the EIS this is attributed to several concerns from several residences along The Gap and Gostwyck Rds and potential flood risks. Upon the reduction of the proposed southern array it was noted to the developer that this at least seemed like a reasonable **starting point** from which to negotiate. From this point the negotiation has effectively ceased. Proposed screening along 2 sides of our property is all that has been raised.
3. It should also be noted that the mapping/images associated with this screening are completely inaccurate.
4. Pg 80 of the EIS alludes to UPC 'maintaining open lines of communication' with S9

S9 was never made aware that the EIS to which it was able to respond to was in fact likely to be a 5 book document. Upon this realisation I contacted UPC to request a hard copy. This is a request that was openly denied by Mr Tim Kirk (UPC) – twice. Some 13 days later I was delivered a copy.

The experience I have had with UPC has been intolerable, unprofessional and nothing short of straight out bullying. The representative viewpoints illustrated in the EIS are misleading to say the least. I have attached photos in an attempt to prove this point. See Mapping/Images

In regards to Community consultation- I personally attended the first 3 community drop in sessions. The pictures in the EIS are truly representative of the amount of people who turned up. The presentations were atrocious and little more (in my humble opinion) nothing short of box ticking. The 4 (and now a 5th, approx. 1 wk prior to Public display ceasing) community sessions have I believe been in the order of 16-20 hrs. This is ridiculous for a development of this magnitude.

On open, effective consultation with ALL affected landholders and broader community I consider this developer to have failed miserably. Considering that 1/3 of the development borders a main road in& out of the town and not a single representative view of what this may look like have I seen.

Mapping/Images

UPC has consistently provided us poor maps/images. This has been pointed out to the developer several times. We have had several issues with scale. I also feel that lack of reference points. Ie Dangars Lagoon and Gostwyck Chapel have not helped with community flyers.

App I Fig 4.2 Landscaping. –again mapping is incorrect. During discussions (prior to cessation) S9 was of the understanding that screening would be adjacent to its boundary. This fig clearly shows this not to be the case. In conjunction with this, Photograph C.4 (not seen by S9 at all until release of the EIS) shows vegetation some distance from its boundary.

Some images from S9



Photo B4 in the EIS was taken from just behind this gate.

I wouldn't class it as a representative view



These two photos are a panoramic view from a Tour Point



Visual Amenity

Supporting infrastructure 4.3.6 – the installation of chain link fence (2.4m) is another visual concern. There are no proposed setback distances from either The Gap Rd , nor Salisbury Plains Rd. This being the main (and signposted) access for the business at S9 again raises concerns on the impact of tourists/ customers, residents visual amenity.

The simple fact is that when I leave my property or for that matter when potential customers arrive at Sunhill via The Gap/ Salisbury Plains Rd they /I will be driving past 2.4m chain link fencing , undoubtedly with appropriate signage to deter public access. This is the route that my family take to the school bus each day (twice). UPC has proposed NO setback distance from these roads. Citing that this is a transient view for motorists. We bought this property (15yrs ago) largely for wide open views and landscape and apparent fertility. It has regularly been pointed out to me that (you don't own the view Richard), fair point. However neither does UPC nor involved landholders, so to significantly change the landscape is no small matter. Approx. 6mths ago I met 2 fellows who own blocks overlooking Salisbury plains. They are not mentioned in the EIS as far as I can tell. And again the fact that it borders a major thoroughfare (Thunderbolts Way) into and out of the region has not drawn the interest it deserves.

As for potential screening, this has been proposed on 2 sides of S9. That's it.

Local knowledge/advice shows without doubt that any screening vegetation planted from tube stock will not even come close to partially obscuring project infrastructure within 2 years.

Considering the amount of involved landholders (2) who actually reside within close proximity to an array area, it seems highly unfair and unreasonable to have this position thrust upon S9 (an operating tourist venue) without any reasonable compensation/s. S9 is rather singular in its visual amenity. In addition to this the fact that it is an operating tourist venue highlights even further the potential for a negative experience. Who knows if it will affect the milkers?

Pg 77 – Appendix I –indicates a lack of knowledge about the potential visual impact of such facilities.

I also draw attention to UPC's seemingly default minimum distance to a dwelling being 50M. The first email we had from UPC said 'because you are within 500m' blah, blah. In the EIS it states that the distance from S9's boundary has been increased from 50m to approx. 240m. (The map I have indicates 200m). Again vagaries from UPC, the distance from project boundary , distance to closest array. Prior to the reduction of the southern array, the distance from the boundary on the southern side had never been discussed.

I have as yet been unable to find the premise for this calculation.

50m!!!!

In discussions with (Andrew Dyer) the Large scale wind and more recently the Large scale solar commissioner a (twice the height of the tip of a wind turbine) approach had been suggested as a reasonable calculation for **minimum** setbacks. I would like to suggest (in regards to Large scale solar) a minimum setback calculation. In this case (the average distance from all involved landholders residences to the nearest panel would be the minimum distance from any 'affected properties' residence. I do not see how it is fair and reasonable for a developer to dictate a distance for affected properties when the lease holders are largely not subject to the same impact.

V.A. Bulletin –VIA Pgs 9&10. –Visual sensitivity has been assessed based on the viewer sensitivity level classification given in the V.A Bulletin in table 2.1. Whilst table 2.2 shows a source point, table 2.1 does not. Who's interpretation is this? In Table 2.3 I would rate S9's situation as a clear 'substantial'

Water / Land classification

What is blatantly clear from the EIS is that the southern array is in essence ALL BSAL classed land. It is also clear that 5th and 6th order waterways run through and along its boundaries. This is not the case for the Northern & Central arrays. The refinement of the southern array has taken this into account. Statements reiterating the reduction of use of BSAL does nothing to change the fact that it IS being used. Again, surely until a complete and utterly exhaustive search of land has been investigated developments should not occur in such locations.

Health

Pg 212 – Although the adverse health impacts have not been established , the possibility of impact due to exposure to EMF cannot be ruled out.

There are 3 children residing at S9- 200m proximity, aged 10, 13 & 14.

Until the adverse health impacts HAVE been established there can be no good reason for this potential exposure to minors. In addition to this these children are also being expected to deal with construction work hours of 6am -6pm, 7 days a week , with a high probability of the construction phase occurring during high school examinations. Noise level data & spreadsheets WILL NOT stop this noise. We live on Salisbury Plains. It is flat, wide and open. I know it sounds daft but 'you can hear for miles'. This makes for an unhappy Dad. Who knows how this will affect the milkers?

I would like to finish with a final request. (in bold text)

Complainants' are limited to 9500characters. Due to the complexity of the EIS & tardiness in being granting a hard copy **I would ask for a minimum 14 day extension to allow for a further submission/s so as to fully address all my concerns.**

These will include but likely not be limited to- wildlife, livestock, more health issues, more water issues and generally more issues.

Overall I think this development has been handled appallingly and am concerned that these submissions will not change its current course. It has been made clear by the developer that due to making a 'political donation' the development automatically goes to an independent commission irrespective of the amount of submissions received. I am as yet to find out how this independent commission is chosen.

-Richard Downes – Sunhill Dairy – S9 – Dad.