

New England Solar Farm – UPC Renewables

Application: SSD 18_9255

I am writing in objection to the proposed New England Solar Farm currently on public display. My opposition is specifically with the Southern Array and Salisbury Plains.

I also support the Uralla-Walcha Community Responsible Solar/Wind Action Group in their objection to this project.

I propose the Southern Array be removed from the project for concerns regarding; visual amenity, construction disruption, large land mass, cumulative impact, prime agricultural land, BSAL, impact on tourism, inadequate consultation with residences and neighbouring properties, benefit to landholders leasing, nil compensation for neighbours, disruption and inconvenience to a family and small business, size of EIS and limited time frame, drought and weather conditions, insensitivity to neighbours, missing viewpoints, screening limitations, water interferences, animal welfare, migratory birds and Dangars Lagoon, reduction in property values,

I am a resident and business owner within close proximity to the development. Identified as S9 in UPC Renewables EIS document.

There are a significant amount of concerns and conditions I believe have not been addressed adequately in the EIS. Due to the extensive details required I request an extension of 2 weeks to submit a full objection regarding this SSD project. I will provide my complete submission by 3/04/2019 to Iwan Davies, Department Planning and Environment.

BACKGROUND

In 2005 my husband, myself and our 10month old son moved to Salisbury Plains, 645 The Gap Road. We bought this 12 acre property knowing it would become our dream home and fulfil our future business ambitions.

The wide open plains, magnificent views and vista sold us straight away. The close proximity to Uralla town ship, The Thunderbolts Way, schools and work meant the spot was ideal. The flat land, luscious pasture and an abundance of water also meant our dream of starting a commercial dairy goat stud would be achieved.

In 2010 Sunhill Dairy Goats began operating. With hard work and raising 3 young children we were able to start our journey towards a sustainable, self-sufficient lifestyle and business. The business began as Sunhill Skin Essentials, a handmade natural skin care range, made on farm from our own herd of milking goats. Our products are sold around the world, online and in various retail outlets. In 2012 I was announced finalist for The RIRDC Rural Womens Award for our agritourism and a diverse agricultural business plan.

In 2014 we identified the need to expand our business and my husband, Richard Downes, joined me working fulltime on the farm, therefore off farm income ceased and we relied solely on the business to provide all financial income for our business and family. Our commercial dairy goat stud also employs 3 casual workers at various times throughout the year.

The farm has been operating as a licensed commercial dairy and manufacturer (Food Authority NSW) since 2015. We produce goat cheese products sold locally at Dales Downtown Meats Uralla, The New England Brewing Company Uralla, The Top Pub Uralla, The Fruit Shop Walcha, Walcha Farmers Markets, DJ Foodie Bliss Armidale, Armidale Farmers Market, Gloucester Farmers Market, and various events, luncheons, festivals and catered functions. The farm shop encourages the public to drop in or we take bookings for coaches, groups, University New England, schools and others for an educational and agricultural tour and presentation. This is growing every year and we have had to change our opening hours so that we are closed two days a week, Monday and Tuesday, to keep up with additional business pressures.

This year our aim was to employ a part time employee but with the drought finances have had to be diverted to maintaining the health of our livestock.

Our farm is a tourist destination and is featured in many information centres, Destination NSW, Destination Tamworth, New England High Country, Tourism events and is widely known as a point of interest in the New England region. We have great support from other local tourism destinations and we have helped in making Uralla a great place to visit and stay.

Every week is full of visitors, coaches, groups, tourist locally and overseas wanting to come and see our beautiful part of the New England. Visitors' often comment about our magnificent location, spectacular views and how green we are compared to everywhere else. No so much now that the drought is impacting significantly. Hundreds of people visit Sunhill every year and these numbers are increasing indicated by the Destination NSW Regional Tourism Statistics.





VISUAL AMENITY

- **Visibility and topography** – sites with high visibility, such as those on prominent or high ground positions, or sites which are located in a valley with elevated nearby residences

with views toward the site. This is particularly important in the context of significant scenic, historic or cultural landscapes.(Large Scale Solar Guidelines)

- ***Visual impacts: The impacts on landscape character and values and the visual amenity of landholders and communities.(large Scale Solar Guidelines).***
- As discussed in the background the visual amenity when purchasing this property was a large factor.
- Our visual amenity starts from our tourist information sign on the crossroad of Thunderbolts Way and Salisbury Plains Rd, this is our visitors first experience to their destination 'Sunhill'. They are then greeted with another tourist information sign on the Salisbury Plains Rd and The Gap Rd, again part of their experience in approaching 'Sunhill'. Finally welcomed to Sunhill Dairy Goats with a big sign indicating they have made it to their destination. (photos to be provided of the viewpoints described).





- The proposed buffer zone of 240m from Sunhill is not reasonable. I refer to The National Wind Commissioner for his recommendations and the recently determined Gunnedah Solar Farm with buffer zones no less than 900m. A measurement based on each affected party should be individually mitigated i.e. Geoff Potts on Salisbury Plains Rd currently 40m is not fair or reasonable.
- If I wish to leave my property I will always be in view of the solar farm and its infrastructure, this will occur on a daily basis and is not acceptable to myself or my family. UPC has not adequately provided screening or setbacks off Thunderbolts Way, Salisbury Plains Rd or The Gap Rd.
- ***The project is ideally located close to Transgrid's 330 kilovolt (kV) transmission line, which passes through the northern and central array areas (Figure 2.1). It also has access to the regional road network; including the New England Highway and Thunderbolts Way (Figure 2.1)(EIS).*** There is plenty of land for UPC to locate another option that will not impact on neighbours and the visual amenity, being close to the transgrid is not an excuse for a project to go ahead.
- ***All land surrounding the development footprint is zoned RU1 Primary Production under the Uralla LEP (refer Figure 2.5), with associated minimum lot sizes of 200 ha.(EIS).*** Sunhill is 12acres and this is a complete inconvenience and disruption to their primary production.
- ***Chain-link (or mesh) security fencing will be installed within the project boundary to a height of up to 2.4 m high. The specific location of the security fencing will be determined in consultation with the contractors selected for the construction of the project and project landholders. Fencing will restrict public access to the development footprint. Where possible, fencing will be positioned to minimise disruption to ongoing agricultural operations on land adjacent to the development footprint.(EIS).*** As a tourism destination this will be extremely off putting, it will feel like living inside a prison and I expect the repercussions will be felt financially.
- Cumulative impact from other solar farms proposed for the area. Salisbury Plains will become an industrial landscape. ***Cumulative impacts: Any cumulative impacts from any other developments (proposed, approved and operating), especially biodiversity, visual impacts, socio-economic and construction traffic impacts. For example, multiple solar developments in close proximity to each other may have a cumulative impact on other rural industries or adjacent land uses, amenity, biodiversity, visual effects or scenic landscapes.(Large Scale Solar Guideline).***

DAIRY GOATS

- Richard and I have been dairy goat farmers since 2000 and have 19 years of experience behind us regarding Dairy Goats. We are a registered stud with the Dairy Goats Society of Australia and have been members for 12years. Our expertise in this area has gained us public speaking roles at the Sydney Royal Agricultural Show, High Schools, Universities, Agricultural Tour Groups from overseas, open days and media releases. We pride ourselves in the breeding of our animals and their health and wellbeing. This is the utmost importance to our business and reputation.

- Milking times are staggered over the year in relation to season and weather conditions, the milking does are milked at sunrise as this is when they have had the perfect amount of sleep. Peak of summer milking starts at 5.30am, Peak of Winter milking starts at 7.30am to 8.00am, sometimes later due to frozen pipes and fog. Construction times of 6am-6pm 7 days a week will impact on the stress of our milking goats and their milk production. I fully expect a decline in milk production over the construction period. Therefore contributing to a loss in income.
- Dust- goats are browsers and extremely fussy eaters, they will not eat dust coated pasture, tree branches and foliage. The stress caused to milking animals will dramatically impact on their production and health. I have major concerns about guaranteed dust proofing of our farm.
- Stress to pregnant animals; our goats kid in early spring, late August to late September, this is the ideal time for kidding and milk production to increase. Winter is the down time when animals rest and are dried off to cause the minimum amount of stress to growing babies. The construction period will inconveniently disrupt this resting period for the goats and possibly cause stress to mother and baby.
- Who pays for goat health issues and complications during construction time and possibly the life of the solar project? There is no research regarding milking goats and EMF and I should not be out of pocket for any unknown expenses and impact on our milking herd. Without optimal health for our animals we will suffer financial constraints.
- ***Land use conflicts: assessment of the compatibility of the solar project with the existing land uses (particularly agricultural and residential land uses) on the site and adjacent land, during construction, operation and after decommissioning. This requires reference to the zoning provisions applying to the land, and consideration of post-development remediation. Remediation should involve removal of panels, footings, underground pipes and cables, and access roads, and reinstatement of soil profiles and land form based on pre-development soil surveys.(Large Scale Solar Guidelines).***



CONSTRUCTION

- ***Stage 2 will include complete construction of the central array area and southern array area and is anticipated to take approximately 20 months to complete. Stage 2 also includes the construction of the BESS, which is also anticipated to take approximately 20 months to complete. Stage 2 will commence approximately 12 months after the commencement of site establishment works planned as part of Stage 1. (EIS)***
- 36 months of construction staggered over the 3 arrays, this will dramatically impact on customers wishing to enjoy the Sunhill experience. Coaches and groups minimum stay on our property is 1.5 hour, this includes a tour and cheese platter enjoyed in our outdoor area provided. This allows our visitors to browse the farm shop and make further purchases. I strongly believe construction hours will limit customers wishing to stay for the optimal experience. Or even want to come at all. Noise, dust, traffic and the general off putting that a construction site provides will determine this. I foresee loss of income during construction time.
- ***Construction activities will be undertaken from 6am to 6pm Monday to Sunday. Exceptions to these hours may be required on limited occasions. Uralla Shire Council and surrounding landholders will be notified of any exceptions(EIS).*** 6am – 6pm, 7 days a week is completely unreasonable. The stress caused to our milking herd with interrupted sleep and the stress caused to my family suffering no relief at all is unacceptable. We work and live here therefore we will have not one day a week break from the relentless construction phase of

this project. This is an inconvenience and completely unreasonable to a family and business the lack of consideration is ridiculous.

- ***As part of Stage 2, a peak workforce of approximately 650 people may be required on-site. It is anticipated that the average construction workforce throughout the 20 month construction period for Stage 2 will be approximately 290 people. As noted in Section 2.4.3, Stage 2 includes the complete construction of the central and southern array areas, as well as the BESS (EIS).*** The safety of my children and family are priority. This is a huge work force that will be with in close proximity to our home and business. This causes significant concerns as majority of workers will be men. Our residence is isolated and I have fears of so many people in such close proximity to myself and young children. At times I will be home by myself or working on the property.
- My sons are 13 and 15, in year 8 and 9 at AHS. They will potentially be sitting the HSC in the middle of this construction time 2021-2023. Adverse impact to their future is of great concern. How is this to be mitigated with UPC proposed construction time?
- Dust – as stated Sunhill is a commercial dairy with licensing to produce and manufacture milk products for human consumption. For us to maintain our A grade rating we must adhere to all requirements provided by the NSW Food Authority. As part of this requirement we must have clean, dust free areas. Currently the drought already makes this a concern but with further dust penetrating our licensed facilities it is a major concern. The dairy is closest to the solar farm and dust generation will impact our license requirements. How does UPC plan to ensure our licensing will not be compromised by their construction period?
- ***Appropriate wash down facilities will be available to clean vehicles and equipment prior to arrival and when leaving the work areas. This mitigation measure will help manage the transfer of weeds and pathogens to and from the development footprint.(EIS)*** The spreading of weeds is of major concern, how will this be guaranteed? What water will be used? The state is in drought!

TRAFFIC

- ***Traffic and transport: consideration of whether the local and classified road network can accommodate the traffic generated by the construction of the solar project, and the need for any road upgrades and ongoing maintenance, having regard to any advice from relevant road authorities.(large Scale Solar Guidelines).***
- The Gap Rd and passing traffic will also increase dust generation. UPC during consultation has said there will be no traffic that will be using The Gap Rd and passing our property. How can this be guaranteed?
- Our children catch the local buses to school. Our daughter who attends Kentucky PS is picked up and dropped off at the end of our driveway school days 8.00am and 4.00pm. Our sons are picked up at Talisker every morning at 7.30am and dropped off at the intersection of Thunderbolts Way and Salisbury Plains Rd at 4.20pm. I am concerned about delays in getting my children to their buses on time. If I miss the bus because of delays who will take my children to school? Who is at fault? I foresee on occasion having to drive my children to Armidale this will impact on my time and pocket.
- How will people using the Gap Rd and Salisbury Plains Rd be able to travel safely during construction and not be impacted? Do I need to tell groups, visitors, schools, coaches that

there may be delays? Again another barrier in place for our business to continue to run smoothly. I foresee loss of income because of these delays.

- UPC have indicated they will not upgrade Salisbury Plains Rd or The Gap Road, surely this would be neighbourly.
- Traffic blockages.

WEATHER CONDITIONS

- ***Natural hazards – areas subject to natural hazards such as flooding and land instability.(Large Scale Solar Guidelines).***
- Winter Months are commonly below 0 degrees and our house pipes are frozen for days at a time. How will frozen water and frozen equipment be addressed during construction? Equipment failure due to minus temperatures.
- Winter on Salisbury Plains also means fog coverage for 6-8 weeks of the year that lingers till 11.00am daily. This does not seem to have been addressed in the EIS. These conditions as we know from our own solar system mean very little solar is produced throughout the winter months. (see photos of fog coverage).





- Flooding – At various times throughout the 15 years we have lived here we have seen extremes in flooding, from flash flooding to days or weeks of flooding in the floodplains that we overlook. The only access to and from our property is by Salisbury Plains Rd. Salisbury Waters and Cookes Station Creek are often impassable. ***Water: Surface water-related impacts, such as flooding and erosion, discharge/runoff and sediment control. If there is any water take associated with the project, the applicant should identify the source of water and may need to acquire water access licences if the project is approved.(large Scale Solar Guidelines).***
- ***Limited parts of the development footprint are prone to flooding or overland flow in the case of a 1 in 100 year flood event; however, flooding generally follows the alignment of watercourses and there is no substantial overbank flooding within the development footprint, (page 15 EIS).*** Over the years we have seen overbank flooding on several occasions directly along The Gap Rd and Salisbury Plains Rd near Geoff Potts residence and the bridge.

MIGRATORY BIRDS AND BREEDING POPULATION

- ***Biodiversity – areas of native vegetation or habitat of threatened species or ecological communities within and adjacent to the site, including native forests, rainforests, woodlands, wetlands, heathlands, shrublands, grasslands and geological features.(large Scale Solar Guidelines).***
- There are currently a family of Wedge Tailed Eagles residing and breeding in Salisbury Plains approximately 2.5km from Sunhill on The Gap Rd. It is an absolute joy to see them every

morning flying above our farm while milking and taking groups on tour. This again adds to the beauty that Salisbury Plains is abundant of. What will happen when there are only solar panels to hunt?

- Thousands of migratory birds descend on our property and all of the Salisbury Plains every year. This is a spectacular event. What will happen when they have nowhere to land?
- See bird identification attached.

TOURISM

- Salisbury Plains is the gateway to Uralla from the south, Walcha, Port Macquarie, Newcastle, Gloucester, Forster, Taree. The magnificent vista provides a grand entrance to the New England. I believe the solar farm and its close proximity to Thunderbolts Way and Salisbury Plains Rd will be an eyesore and a hazard. People who may wish to stop will not have a safe place to do so. People passing through will be distracted by the sheer size of the infrastructure and the close proximity to the roads.
- Security chain link fencing will also distract from this vista.
- Tourist will not bother coming to see the little goat farm in the middle of the solar farm because the landscape will be uninviting.
- I foresee a loss in income due to the drop in tourism to our destination.





NEIGHBOURS AND THE COMMUNITY

- We have always had a very good relationship with our adjoining neighbours and communication has always been open. Unfortunately since the initial contact with UPC and our neighbours we have had very little contact and communication has stopped. This has been extremely isolating and distressing. We have contacted both adjoining neighbours, by phone, in person and via letter addressing our concerns. It seems they were not willing to discuss this and were happy with UPC's consultation with us. Please see attached letters.
- As part of my concern of this project I asked to be part of the community sharing benefits reference group. I was made aware straight away that not many members of the community were interested in partaking in this group. This was very disappointing. I became disillusioned with this process as to me it seemed very much objective driven by the consultant and significant issues raised seemed to have little value. I believe the consultant did a very good job but I was not convinced of the benefits being seen by all members of the community. I withdrew from this group out of protest as I could no longer believe in or

participate in this group when I could see the ultimate outcome was not being beneficial for the whole community.

- Community consultation during winter was pointless. Here in Uralla we hibernate over winter and it takes an event like the Business Chamber Awards to get people out and about. When talking to community members most said they knew nothing about it, or had something else on, or just wasn't interested. Unfortunately Uralla can be very apathetic during the winter months. I attended to two and unfortunately like others I was unable to attend due to other commitments. The two I did attend I found of very little benefit.
- I have found this process extremely isolating and I can see the community is very split with the impact this project may or may not have on it or the benefits it may or may not receive. When speaking to community members the first comments are: "Surely they will buy you out?", "Surely you are getting some compensation", "Can't they just move it further away", or "Won't they upgrade your road" or "What about the goats?", "It will be good for Uralla", "The landholders will do well", "there will be lots of jobs". I believe the community has not had enough time to digest this project to the full extent.

CONSULTATION

- ***existing vegetation was observed along the boundary of this property; however, additional landscape screening is proposed to mitigate visual impacts at S9;(EIS)*** As discussed it takes many years for any vegetation to grow in Salisbury Plains due to the extreme weather in winter. This screening kindly provided by UPC will do nothing for a number of years. ***Screening solutions proposed by developers should be realistic and effective. If trees are proposed, trees should be planted in a timely fashion and well maintained so to provide effective visual screening within a reasonable timeframe. Other screening solutions, such as structures, should also be considered when proposing and negotiating a visual screening agreement. (2.2.4 2017 Annual Report National Wind Farm Commissioner)***
- ***Other potentially affected stakeholders – to discuss concerns, identify potential impacts, inform project design and develop mitigation measures. This is likely to include owners and occupiers of adjacent land and those in the vicinity of the solar development. (Large Scale Solar Guidelines).*** I feel this has not been adequately addressed.
- Consultation was first initiated by Killian Wentrup and David Richards. We were told about the proposed project and they answered as many questions as we could think of at the time, this was a very intimidating experience. The feeling created by Killian was that this was a SSD project and would be going ahead.
- Each one on one consultation was highly stressful, intimidating and very objection focused by Killian. The mental stress each meeting caused would linger for days and we felt there was no one to go to for help or even know what to do about a SSD project if you had concerns.
- Visual amenity, to be mitigated.
- Devaluation of land, to be mitigated.
- Dust and noise, monitoring.
- Loss of income, to be mitigated.
- Tourism, to be addressed.
- Health, more research results to be presented.

- Viability of project, more information required.
- Flood plains and aquifer, more information required.
- Water, drought conditions.
- Consultation by UPC has already impacted on our family, business and relationships with neighbours and the community. The drive and passion we once had for our job and business has deteriorated and this state of limbo of not knowing what will happen lingers.
- As a family we no longer wish to live here if this project goes ahead as it is in the EIS. You can't just up and move a commercial dairy so the business will close as well. This is unfair and unreasonable.

BSAL

- ***Agriculture – important agricultural lands, including Biophysical Strategic Agricultural Land (BSAL), irrigated cropping land, and land and soil capability classes 1, 2 and 3 . Consideration should also be given to any significant fragmentation or displacement of existing agricultural industries and any cumulative impacts of multiple developments.(Large Scale Solar Energy Guideline)***
- BSAL map indicates the whole of the Salisbury Plains, Southern Array is classed BSAL. We are well aware of this prime land and this was a key reason when purchasing the property. Knowing that dairy goats would produce an abundance of milk. This prime land should be prized and not given away lightly. Future agriculture of Australia relies on this land.
- Prime agricultural is an important feature to the New England, there is plenty of land it does not have to be prime land.



RECOMMENDATIONS

- Neighbours Agreement as recommended by Wind Commissioner. ***Developers should consider the merits and use of appropriate neighbour agreements as a potential component of its overall neighbour and community consultations and project strategy. If utilised, neighbour agreements should be negotiable, fair and reasonable, written in plain English and the neighbour should have access to and obtain appropriate legal and financial advice before entering into any agreement. Agreements should not restrict the neighbour from being able to raise issues and concerns about the wind farm, including subsequent proposed changes to the wind farm's design, make complaints about the wind farm nor should they subject the neighbour to conditions that exceed normal permit requirements. There may be existing, operating wind farms where a retrospective neighbour agreement should be considered. Developers may of course opt for a broader community support model that benefits a wider group of community members, including neighbours, that excludes specific neighbour agreements. (2.2.3 2017 Annual Report, National Wind Farm Commissioner).***
- Sufficient screenings and setbacks mitigated with affected neighbours. Distances.
- Compensation provided on each affected parties circumstances.
- Removal of the Southern Array until further investigations are completed.
- Independent audit on the EIS.

I believe I have covered only a fraction of concerns I see as significant in regards to this project and require more time to be able to add and elaborate.

Thank you

Corinne Annetts

Sunhill Dairy Goats