

Gemma Burke
18 Thunder Circuit
Harrison ACT 2914

7 August 2018

To: Planning Services
Department of Planning and Environment

Submissions in support of objection to Springdale Solar development

To whom it may concern,

Having grown up in the Sutton area and as a member of the local community, I wish to make the following submissions in relation to my vehement opposition to the proposed Springdale Solar Development:

1. The draft NSW Government Large-Scale Solar Energy Guideline identifies the following preferable site conditions:

- a. *Optimal solar resources in order to maximise energy generation*

The proposed site is subject to thick lingering fog in late autumn and in the winter months due to its position which encompasses a large valley and creek. Often the fog does not lift until lunchtime.

- b. *Sites with suitable land area, geology and hydrology, and adequate access and road connections, including options for managing construction traffic*

The proposed site is affected by water inundation in years when the area is not impacted by drought (in this regard, it is notable that all surveys have been undertaken during a severe and longstanding drought).

The current roads are simply not capable of supporting the amount of construction traffic a project of this nature is likely to involve. Sutton Road and East Tallagandra Lane and Mulligans Flat Road are narrow bitumen roads with one lane in each direction. Tallagandra Lane itself, on which the project is proposed to be built, has a short narrow portion of bitumen surface, but is thereafter a narrow dirt road which is commonly in poor condition. Tallagandra Lane is also only just wide enough for a car to pass in each direction.

These roads are all frequented by school buses during term time. They are all also regularly used by cyclists and are occasionally used by horse riders. Construction traffic arguably presents a considerable risk to other road users given both the state of the roads, and the likely volume of traffic the project would generate during the construction phase.

- c. *Sites with characteristics that may assist in minimising localised impacts such as:*

- i. *Land that does not contain native vegetation or has previously been cleared and utilised for industrial-type purposes (brown field sites) in rural settings.*

The proposed site does not meet this criterion. It is a site with a scattering of native trees, which has largely been cleared for livestock farming purposes. It contains a creek running through the valley. It has not been used for "industrial-type purposes" and is, in fact, prime agricultural land which has been used for grazing of livestock.

ii. Unobtrusive sites with flat, low lying topography

The proposed site is not flat, and involves hills and a valley through which a creek runs.

iii. Sites with potential to be screened, such as those that can readily be vegetated along boundaries to reduce visual impacts

The proposed site has multiple neighbouring properties, some of which look directly down onto the site from higher ground. There is also a road that runs along one boundary, and I believe glint and glare could pose a safety issue for road users. The potential for screening is highly questionable. In any event, proposed plantings will not provide effective screening for in excess of 20 years and elevated neighbouring properties will never benefit from the proposed screening.

d. Land that can be readily decommissioned and rehabilitated back to pre-existing or better condition

Noting that the proposed project has a term of 30 years, decommissioning is a question for the future and is of considerable concern. What guarantee is there that money will be available for remediation at the end of the term? What if the company running the project goes bust and has no money to remediate? Who is the judge of the quality of remediation work and what guarantee is there that the site would be returned to current or better condition? What guarantees are there that all above and below ground infrastructure will be removed?

Regardless of any safeguards or plans that may be intended in terms of decommissioning and remediation, the 30 year term of the project means that there is no comfort to neighbouring landholders, who will likely be forced to put their properties on the market (at significantly reduced prices) to escape this eyesore.

e. Localities where the community broadly supports the development

My attendance at community meetings suggests that the local community is very much opposed to this proposed development and the negative impact it is anticipated it will have should it be approved. It has already caused considerable upset and disharmony. I understand that the Yass Valley Council ("YVC") has voted to oppose any further wind farm developments, hence it is anticipated that YVC will also oppose the proposed solar development.

f. Localities identified by Government as optimal for renewable energy development

The proposed development site **does not** fall within a renewable energy zone identified by the NSW Government.

g. Proximity to the electricity network and connection capacity available at the anticipated connection point

Whilst there is electrical infrastructure running through the proposed site, one must query who will benefit from the energy generated? If it is for the benefit of ACT

residents, being the largest nearby population, it is in my submission completely inappropriate that NSW residents should suffer the negative impacts of this development in order to benefit their Territory neighbours (and I say this as a person who resides in the ACT).

2. The draft NSW Government Large-Scale Solar Energy Guideline identifies the following areas of constraint:

- a. *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*

The Mulligans Flat Nature Reserve is within 5 kilometres of the proposed development. Further the proposed site is a key biodiversity area providing connectivity between the largest remaining and most intact contiguous area of Yellow Box and Red Gum Grassy Woodland and other regions of NSW.

The proposed site is a flyway/flight corridor for native birdlife.

The proposed site is within the Greater Gorooyarroo area.

Biodiversity (including critically endangered and threatened species, specifically the Golden Sun Moth, the Superb Parrot, and the legless lizard) will be affected both directly and indirectly during construction and operation. Project infrastructure and fencing will negatively impact movement corridors for native fauna, including turtles, shingleback lizards, skinks, kangaroos, wombats, echidnas, and the like.

I am given to understand that aboriginal artefacts have been found on the site and there remains the possibility that additional artefacts of this nature could be disturbed.

- b. *Important agricultural lands, including Strategic Agricultural Land (both critical industry clusters and biophysical strategic agricultural land), and land with soil capability classes 1, 2, and 3. Consideration should also be given to any significant fragmentation or displacement of existing agricultural industries*

The land is currently used as grazing for livestock. It could equally be used for cropping. It is excellent fertile agricultural land, and the size of the project (some 850 acres) is such that there would undoubtedly be an impact on existing agricultural activity.

- c. *Residential zones or urbanised areas, with consideration for proximity to dwellings and potentially affected properties, which will increase near and within urban areas including some rural zones (such as R5 Large Lot Residential and RU5 Village)*

There are multiple neighbouring properties which will be unable to avoid the glare, glint, and noise that will emanate from the proposed development. I am led to believe that one such property has already been placed on the market. The area has numerous small hobby farms used for rural residential purposes. The proposed development is completely out of keeping with the usage of neighbouring properties.

An 850 acre solar development constitutes intensive use of the land, which I understand is opposed by the NSW Department of Environment (NSW OEH), Yass Valley Council, and the ACT Government. It is of note that the proposed site falls within 5km of the ACT border, which is supported as an exclusion zone for intensive development in order to retain the rural character of the region.

- d. *Sites with high visibility , such as those on prominent or high ground positions, or sites which are located in a valley with residences with elevated views looking toward the site*

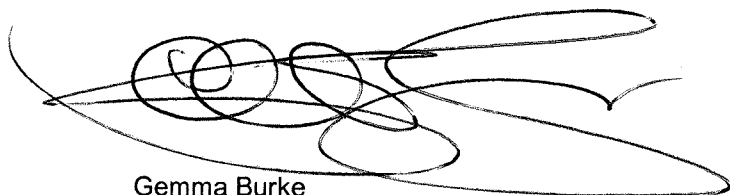
The proposed site incorporates a valley area, into which elevated neighbouring properties look. These properties will be unable to avoid the glare emanating from the site. As noted above, I understand that one such property has already been placed on the market. It is also anticipated that noise from the site and the traffic associated both with its construction and ongoing function will detract from the quiet enjoyment of neighbouring properties.

- e. *Prospective resources developments, including areas covered by mining leases, petroleum production and exploration licences.*

Not applicable.

3. I am concerned by high temperatures which may surround solar infrastructure and the risk to both wildlife and neighbouring properties, and the possibility of fire in what can be a very dry area during the summer months. The risk of fire to neighbouring properties cannot, in my view, be overstated. What safeguards are anticipated for the prevention of fire and dealing with any fires?
4. I am concerned by the need for water in the construction and running of the proposed development, and the impact this may have on the water table in the area. Further, there are significant concerns about discharge/runoff to surface water and groundwater resources, and the impact on neighbouring properties and Yass Valley Catchment in this regard.
5. I am concerned by potential health impacts including those posed by electromagnetic fields.
6. The site for the proposed development is an area of beautiful rural land situated in an area traditionally used for hobby farms and smaller scale farming. The community is a vibrant and close one and the suggestion that a large scale development of this nature should be built within it has caused considerable upset and tension amongst the local people, who share a common love of rural life and the serenity associated with it.
7. The site for the proposed development is prime agricultural land situated within a stone's throw of the ACT border. People residing in the area have paid significant sums for their properties, and their quiet enjoyment of their rural surrounds will undoubtedly be adversely impacted by the installation of hundreds of thousands of solar panels, and the increase in traffic on an already poorly maintained dirt road. Traffic and construction noise, glare, glint, reductions in visual amenity, and detract from the surrounding landscape will clearly have an impact on property values in the area, which could be expected to decrease significantly.
8. It is of note that, whilst job creation and economic benefit are touted as positives of the proposed project, solar projects in Queensland have largely involved highly mobile workforces and 457 visa holders. Further, it is anticipated that tourism to local destinations such as wineries may be adversely impacted by construction traffic.
9. It is of concern that large scale solar arrays will negatively impact soil functioning and the surrounding environment.
10. The size of the proposed development (850 acres) is extraordinarily large and, as such, it shares boundaries with multiple properties. Accordingly, its potential impact is very far reaching.

In short, I urge you to consider the proposed development with great caution. Large scale industrial development of this nature simply does not belong in the Sutton area.

A handwritten signature in black ink, consisting of several overlapping loops and a long horizontal stroke extending to the right.

Gemma Burke

7 August 2018