

Planning Services
Department of Planning and Environment
GPO Box 39
Sydney 2001

14 th August 2018

Attention Director- Resources and Energy Assessment

Submission in objection of the proposed Springdale Solar Development, Sutton NSW

Dear Sir/ Madam,

I am writing to you to express my objections to the proposed Springdale Solar development near Sutton NSW.

I strongly believe the site located on Tallagandra Lane is not appropriate for a large-scale solar farm development.

Firstly, the proposed project site near Sutton does not fit within the New South Wales Government's Priority Energy Zone areas. These include the New England area, Central West and South-West regions. These three areas have been chosen for their "*outstanding energy resources, and are close to existing network infrastructure and have reduced environmental and energy constraints*" (energy.nsw.gov.au/legislation-and-policy/energy-zones). The Sutton area is not within the region of optimal solar exposure for NSW.

The proposed site is set in a valley which is regularly prone to hanging fog. It is very common for this valley to be blanketed in heavy fog and for this fog to linger up until midday or later. Please see attached photo.



Hanging dust clouds and stirred dust are also a common occurrence in this valley, largely due to Tallagandra Lane which is a gravel road. The dirt is continuously stirred up by the ever-growing flow of traffic on this road. Research I have undertaken concludes that dust sediment impairs the effectiveness of the panels. As the Springdale Solar development currently has the road running through the site, not even adjacent to it, what impacts will this amount of dust in the air have on the efficiency of the panels?

The Large Scale Solar Energy Guidelines state, that *'as a large scale solar development is not constrained by access to resources to the same extent that mines and other renewable energy generators are. As such, site selection provides a strong opportunity for a solar development to minimise its adverse social and environmental impacts.'* From conception, community consultation and engagement has not been approached appropriately. The site was not chosen in consultation with the community and neighbours. The project's location was decided based on an agreement between the landowner of Springdale and Renew Estate. Neighbours were not given the opportunity to decide whether this was a development that they wanted in the community. Several local neighbours have felt very frustrated by the community consultation process. Renew staff are not familiar with rural living and apparent lack of understanding or empathy for the neighbours' concerns has made them feel incredibly frustrated and powerless. The offering of 'incentives' for the neighbours and the wider Sutton Community, has helped fuel division amongst the locals and community. Those who feel 'unaffected' through locality or other environmental impacts are most open to receive the incentives offered. I feel that this project has failed to create the trust within the community that it may have hoped to develop and which is crucial in developing the social licence necessary for a community to embrace the project.

I also have great concern for the mental health and wellbeing of several of the neighbours of Springdale. Over the past roughly nine months I have been witness to the incredible stress and strain that this project has already placed on the local families and neighbours. Some incidental quantitative data collected from neighbours;

"I can't sleep at night, I can't stop thinking about it (SSF)"

"I just feel like I want to pack up and move away if this solar farm goes ahead"

“ I just feel like it is all too much dealing with this”

“ I feel so betrayed by my community”

“What happens if a fire occurred there (Solar Farm) we would have no way out”

“ I won’t be able to go out into my garden because all I will see is panels reflecting”

“What about the health effects of being so close? I have to think of my kids.”

In response to the Environmental Impact Statement (EIS)

Heritage- non Aboriginal Heritage.

The EIS refers to Sutton and Gundaroo as being historical villages. Sutton was settled in 1869. The report also states that there is no historical significance on the site or surrounding areas. My ancestors moved to the Gundaroo area in 1849 and then purchased the land on which is now known as Springdale and the adjoining property of Spring Flat to the south in 1859. There is a rich history attached to the proposed site and close surrounds. Stories of farming, of hardships and the building of Canberra, have been recorded. There are remains of the original homestead, sheep pens and sheep dip. There was even an old school house. Some of this history has been documented and detailed in the Reid Family history book. I am the sixth generation of Spring Flat and the ancestor that once owned Springdale, my children being the seventh. Both the current 5th generation land owners still farm the land. The very home that my great grandmother grew up in is being restored by a family that would have this solar development that within a few hundred meters of their doorstep. The history of Springdale and its neighbouring property, predates the historical village of Sutton. Our family’s long attachment to this land and community, with historical stories, photos, written memoirs and historical residential remains, would be considered under the NSW heritage assessment criteria (d). Assessing heritage Significance: Office of Environment and Heritage

Visual Impact

- Aesthetics of site and visibility to site: Neighbour (Receptor 3, figure 19) on the adjoining property has an elevation of approximately 55 m above and an approximate distance of 500m from the proposed site. Considering this elevation whereby receptor 3 currently has visibility across the entire valley for many kilometres, the aspect and visual impact noted in the EIS assessment is completely inaccurate. EIS as stated *Views to north to north-west towards the project from the residential receptor and immediate property curtilage would be partially screened by existing vegetation and cultural planting. (Table 23)* ***Sensitivity to change: Low, Magnitude of change: Negligible, Significance of Visual Affect; negligible.*** Please see attached photo from this aspect. Note: No project planner stood on this location and I believe this is an incorrect assessment.



Please provide a reasonable solution for screening this receptor from the site?

Quality of Springdale Site

- The grassland and vegetation have been classified as poor. There was no reference made that this may be a result of drought. Historically, for at least the past 70-100 years, Springdale has been fertilised to enhance the quality of the pastures for optimal grazing. However due to prolonged lack of water as a result of the current drought, conditions may have appeared 'poor' but this may not necessarily reflect this particular land when not in drought conditions.

Environmental impact

- EIS *"For both this and the fauna element an initial desktop assessment was undertaken. This includes searches of the NSW Wildlife Atlas and the Commonwealth Protected Matters Search Tool (PMST). Both of these searches were considered to a 10 km radius from the Site and were used to inform field surveys and for the preparation of a likelihood of occurrence assessment."* I am lead to believe after reading this EIS, in its entirety that the ACT (roughly 3.5 km away) was omitted from this search radius. Reasons being;
- Failed to mention the close proximity to critically endangered wildlife of the **Mulligans Flat Nature reserve approximately 3.5 km from this development**. Mulligans flat is a sanctuary for endangered species including the Eastern Bettong and Eastern Quoll. Why is there no mention of Mulligans Flat Sanctuary in the EIS addressing this, considering its close proximity to the site?

- **The Horse Park Wetlands** which is also less than 10 km from site, is considered to be of national importance and is listed in the 'Directory of Important Wetlands in Australia'. The wetland is also listed in the Register of the National Estate as *important habitat of Latham's Snipe and as containing one of the best regional examples of a permanent, lowland freshwater marsh*.

www.environment.act.gov.au/__data/assets/pdf_file/0010/576847/Gungahlin_Biodiversity_KF-MM_final_version.pdf
- No discussion on potential harm to migratory birds (such as Latham's Snipe) which follow the East Asia- Australasian flyway. This proposed solar site is situated on this flyway path. What impact will such a huge array of panels have on birds flying over such as the 'lake affect,' where birds fly into the panels mistaking them for water? What is the potential impact of this particularly on these migratory wetland birds? Pelicans have also been seen on several occasions flying over this particular valley.
- Taken from the EIS: *"PV panels although having a low heat capacity can be up to 20°C warmer than the ambient temperature during the day causing the surrounding air mass to heat and rise"*. This can result in a heat plume. Although the probability of it affecting aircraft is seen to be low, what is the risk for birds on the migratory flyway path?
- What is the impact of the above-mentioned temperature rise (up to 4 degrees in the evening research has shown) on the local flora and fauna? What impact could this have on the grasslands that are home to endangered species such as the Golden Sun moth and legless lizard? What affect will elevated ambient temperatures have on the surrounding neighbours flora and fauna, particularly those who are close to the site but at a higher elevation? Considering the current severity of the drought, which is already causing stress on the local flora and fauna, what additional stress could be placed on the local ecosystem?
- Please outline measures in place to protect the striped legless lizard if all ground cover is going to be cleared during construction?
- What protective strategies are identified for other vulnerable bird species such as the Scarlett Robin which migrates to Canberra in the cooler months and is present in this location? According to an ABC report 7.04.16, the Scarlet Robin could be facing extinction within 30 years if habitats are not protected. One SR was observed on the adjoining property this week. The Scarlett Robin is listed vulnerable in both the ACT and NSW with greatest prevalence noted in the ACT Environment and Planning Distribution Map shown in the Mulligans Flat area and across the NSW border.
- What mitigation measures are in place for Kanagroo's that will be displaced from the grasslands at this site? This can cause additional risk to traffic on the roads. The kangaroos will be forced to seek refuge in neighbouring properties that are already desperately lacking feed for stock.

- What about the rodents and pests such as rabbits, foxes, rats and mice that also inhabit the grasslands? Are they going to be forced onto neighbouring properties and put additional stress on their existing resources?

Roads

- The main arterial road through the Sutton Village and Tallagandra Lane are not suitable for heavy machinery or additional influx in vehicles. The road is already busy with local traffic and additional traffic from the northern suburbs of Canberra diverting through the region to avoid roadworks and heavy delays. These roads are narrow, often no lane markings, have tight corners, feed from many private driveways, has culverts and gravel edges.
- The EIS makes mention that several signs may need to be removed in order for large trucks to manoeuvre past. I believe this poses a significant safety risk for the local and wider community (Table 50).
- Potential vulnerable persons at increased risk: large numbers of cyclists from the ACT and surrounds use the Mulligans Flat and East Tallagandra Lane. This is a very popular route for cyclists who also bring business into Sutton Bakery and Gundaroo.
- Local school bus: the bus makes multiple stops along this road with children embarking/disembarking. The bus runs 4 trips a day, twice in the morning and afternoon.
- Safety for local traffic: local traffic would be exposed to the additional risk with additional cars, construction and heavy machinery.

Bushfire

- Houses are far too close to the site; some neighbours could potentially be 'trapped' if a fire was to occur on site.
- The sites proximity to a public road increases the risks of accidental or deliberate arson.
- EIS bushfire mitigation measures includes: *'Seek 'mutual assistance' agreement with local property owners to use dams as water sources in the event of an emergency'*. Due to the worst drought on record, neighbours should not be placed in a position to have to agree to sacrifice their already stretched water supplies.
- *'BF14 Suitable and adequate emergency response equipment shall be provided and maintained on-site during the construction of the project. This would include fire extinguishers and 20,000 litre static water supply that would be installed at the early part of the construction.'* In my opinion this would seem rather insufficient, even in an interim until fire brigades arrive. My residential home houses a 5,000 L water tank in our back yard for the plants.
- The EIS mentions 4 fire stations within 16 kilometres of site. This is untrue, both Wallaroo and Charnwood fire stations are approximately 25 km from Springdale.
- Will the site be staffed around the clock? If not, what is the fire management plan after hours?
- The EIS statement states there is a 20 m access around all assets for access for fire trucks. Could Renew Estate please provide a more comprehensive map with more precise measurements including distances from neighbouring fence lines, size and heights of large infrastructures such as the substation?

Economic benefit to the local area

- Potential financial disaster for neighbouring properties that adjoin the Springdale site, both in the present and within the next thirty-year period. These values could drop as much as twenty percent or more. Large scale solar developments are not historically positioned in semi-rural land on primer locations (approx. 25 km to city centre of Capital city).
- What would the value loss be to the property that sits within a few metres of the proposed substation? This will impact on the land owner and future land owner's ability to be able to use the land to its full potential?
- With property prices expected to decrease in value surrounding the development. Will the Yass Council adjust and decrease rates accordingly?
- I cannot see how this project will bring any significant economic advantage to the Yass community. The project is located less than 5 km from the ACT border and less than 8 km to supermarkets, cafes and accommodation in Canberra. Employees and workers will most likely come from Canberra (if not a transient workforce) and access local services in Canberra.
- The largest shareholder in the Springdale development is the German, Wircon Group. Beast solutions are also stakeholders and they are not based in NSW. Renew Estate is a Sydney based company.
- The generated power will be utilised by the ACT and will not benefit the Yass or Sutton area and deliver them low cost energy. *'The more southern feeder (TRANSgrid transmission line) is the Canberra to Queanbeyan circuit that the project would be connecting to.'* Extract from the EIS

Noise and Vibration

- Several of the neighbours in closest proximity to the site are retired and therefore will be at home during the peak hours of construction activity. This will no doubt further impact the mental health and wellbeing of these neighbours.

Aviation Flight Path

- Stating the EIS: *'The PV solar panels would be aligned as much as possible to face directly into the sun and follow its path across the sky from east to west throughout the day. As approaching and departing aircraft would be traveling in a southern and northern direction respectively, the likelihood of an aircraft being in direct reflection from the sun would be reduced to the middle of the day. Arrivals and departures at Canberra Airport are concentrated to the morning and afternoon peak periods with relatively few movements between 11 am and 1 pm.'* Flight schedules and the Canberra Airport's capacity will increase dramatically over the next thirty-year period. At present aircraft heading south towards airports such as Melbourne, depart north and then make a left hand turn south, appearing to make this turn around the proximity of Springdale. What further glare risk could this have on morning flights, which require turning from north to south in a westerly direction when the panels are facing east?

Further clarification

- Why are residents only identified within a 2 km radius on impact maps in the EIS? According to the Community Engagement and Benefit Sharing in Renewable Energy Development Guide, (Victorian Department of Environment, Land, Water and Planning) a layout of hosts and neighbours within a **3- 5km radius** should be indicated as part of the social impact site map.
- EIS refers to *'The nearest residential dwelling is located approximately 150 m to the north of the Site and the nearest town, Sutton, is located approximately 7 km to the southeast.'* Why has ACT been omitted? The Canberra suburbs of Bonner and Forde are closer or similar proximity to the site as Sutton. Gungahlin town centre is within 10km from this site.

Thankyou for considering my objection to the proposed Springdale large scale solar development, your time is appreciated.

Regards,

Lisa Navarro

Gungahlin (ACT)