

159 East Tallagandra Lane  
Sutton NSW 2620

## **Springdale Solar Farm – State Significant Development Application - Comments and Objection**

My name is Bill Campbell and I have resided at 159 East Tallagandra Lane, Sutton, NSW for 14 years. I wish to comment upon, and object to the application by Renew Estate Pty Ltd to build the industrial-sized Springdale Solar Farm (SSF) at Tallagandra Lane, Sutton. The proposed project will be totally out of keeping with the rural landscape and lifestyle currently enjoyed in Sutton and its surrounds.

2. In making this submission I wish to be clear that I do not oppose the development of additional solar energy generating capacity *per se*, but to place this industrial-sized development of over 800 acres in the close confines of a tightly knit rural and farming community is simply beyond the pale. The New South Wales Government has designated three Energy Zones in New England, the Central West and the South West suitable for solar generation and that is where the proponent should be looking to be placing its large-scale solar developments.

3. The primary focus of my comments will be on aspects of project as outlined in the *Springdale Solar Farm Environmental Impact Statement* (EIS) of 29 June 2018. I cannot hope to address all aspects of the project. However, those aspects that I have addressed leave me sceptical about the likely sufficiency of the information provided on other aspects.

### ***The application is premature given the early stages of planning***

4. The first and general point I would make is that the EIS appears to be quite premature given the number of important details of the project that are yet to be decided, or which are to be the subject of further planning. Without being comprehensive, let me take you to some of these aspects:

- The project would be subject to the execution of a Voluntary Planning Agreement with Yass Valley Council (YVC) on a number of important construction matters. Consideration of that agreement is only at an early stage (EIS pages v, 22, 23 and 29-30);
- Surface water quality and quantity to be the subject of an Evolution and Sediment Control Plan (ESCP) the content of which is yet to be determined (EIS pages vii and 112);

- Chemical storage and spill management procedures to be part of a Construction Environmental Management Plan (CEMP) the content of which is yet to be determined (EIS pages vii, 28 and 113);
- The large increase in traffic on local roads is proposed to be covered by a Traffic Management Plan the content of which is yet to be determined (EIS pages ix and 33);
- A Bushfire Management Plan is proposed and yet to be developed (EIS page x);
- The on-site switch-yard and substation are to be finally designed in collaboration with TransGrid and AEMO (EIS page 17);
- Finalisation of the Landscape Plan "in consultation with the most affected visual receptors and other stakeholders" (EIS page 104);
- Prepare an O&M Plan for the operational phase (EIS pages 113); and
- Undertake a comprehensive archaeological salvage program prior to ground disturbance (EIS pages 180).

5. I fully understand that some more detailed planning would need to take place if the go-ahead were given to the project. However, much of what is to be covered in the above plans is highly relevant to whether or not that go-ahead should be given. There are many matters proposed to be covered in the subsequent plans that must be decided and made public before the Significant Development Application can be the subject of a final decision. In the absence of that information, the application should be refused.

***The SSF application contains too much leeway for change in the course of development and operation***

6. Leaving aside the lack of adequate information, the planning for the SSF contains significant qualifications and "outs" which provide too much scope for the proponent to change matters in the course of the development and operation of the facility. Many such changes would likely be to the detriment of the environment and the Sutton community, particularly those residents living adjacent to the proposed facility. Again, without being comprehensive, let me instance a few of these qualifications:

- "Approximately 22 containerised power conversion stations" [Underlining mine] (EIS page v)
- "[T]he operation of the project is expected to be compatible with current adjacent land uses" [underlining mine] (EIS page vii)
- "Up to approximately 400 light vehicle and 75 heavy vehicle movements per day are anticipated [underlining mine] (EIS page ix). Without belabouring the point the word "approximately" is on my count used 126 times throughout the EIS. In a proposal of this magnitude and effect on the local community much more certainty in explanation, planning and outcome is needed.
- "The intention is to establish vegetation with characteristics of local communities to maintain a consistent and landscape character". [Underlining mine] (EIS page 22). The use of the word "intention" indicates either that it is a present intention that could change, or that it is not certain whether such a form of vegetation could in fact be achieved.
- "Work is generally expected to be completed within standard hours. Out of hours work may be required, however would be limited to activities with low noise generation where practicable." [Underlining mine] (EIS page 31).
- "Earthworks are unlikely to intercept the groundwater table." [Underlining mine] (EIS page 109).
- "Construction works are generally not proposed to be conducted at night-time; therefore a sleep disturbance assessment for the construction works is not required" [Underlining mine] (EIS page 129).
- As part of noise management and mitigation measures "consider using bored piling for construction works where practicable". [Underlining mine] (EIS page 138).

These qualifications, if subsequently relied upon, would result in significant impacts on the environment and/or the local community. Much more certainty is needed before any Development Application is granted.

### ***Traffic and transport***

7. It must be said that the information and assumptions concerning traffic and transport contained in the EIS are completely out of date and incorrect. I make this observation both as one who has lived in the area for 14 years and as

somebody who lives on the proposed route of the transport supporting the proposed development. More particularly, I (and anyone else who lives along that route) have witnessed a vast increase in the amount of both light and heavy vehicle traffic over the past 2 ½ years none of which is reflected in the traffic volume figures from Yass Valley Council set out in Table 48. In this respect I note that the latest figures in that table are from May 2016, and some are as early as January 2008 that being over 10 years ago.

8. The reasons for the increase in traffic over those past 2 1/2 years are many:

- First and foremost is the large increase in both light and heavy traffic on that part of the proposed route between the Federal Highway turn-off to Sutton and the start of Tallagandra Lane. These vehicles are travelling to and from Gungahlin in the ACT to Sydney, Queanbeyan and now Canberra. The route of Mulligans Flat Road, East Tallagandra Lane, and Sutton Road through the village of Sutton is the quickest route between North Gungahlin and Queanbeyan and North Gungahlin and Sydney. The reason that route (as opposed to travelling through the ACT) is being used more frequently is that it is now fully sealed.
- Secondly, there is now a large amount of traffic along that route each workday morning and evening travelling from North Gungahlin to central Canberra and return. This is the result of the extensive road works and light rail works in the ACT that are likely to continue for some period of time. It is therefore incorrect to "assume" that the traffic along the proposed route "is evenly spread throughout the day" (EIS page 135). In other words despite the much longer journey, many residents of North Gungahlin find it quicker to travel to work via Sutton to reach central Canberra and other destinations such as Fyshwick and Canberra airport.
- Thirdly, there is now a much heavier volume of traffic travelling along Sutton Road to and from the direction of Gunning and Gundaroo. To a degree this seems reflected in Table 48 if one compares the figure of 2075 vehicles in item 4 concerning Sutton Road which was counted in 2010 as compared to the figure of 2917 vehicles again from Sutton Road (albeit in a slightly different position which would make no difference) which was counted in May 2016.
- Fourthly, a practice has developed over the past couple of years of transporting spoil from ACT building sites (of which there are many) and

depositing it in nearby areas of New South Wales. One of the sites at which such material is deposited is near Tallagandra Lane just beyond the proposed solar development. The spoil is transported in large dump trucks with trailers travelling along the route proposed for the transport supporting the building and operation of the SSF. This form of heavy vehicle traffic is periodic in the sense that it will occur for a week, or even weeks at a time and then be in abeyance for varying periods of time. However, when it does occur, as it has over the past couple of weeks, there can be 40-50 additional movements of heavy vehicles per day along the whole of the route from Monday to Saturday starting early in the morning and finishing just after sunset.

- Focusing on East Tallagandra Lane for a moment, I also hold real reservations about the veracity of the April/May 2015 traffic volume figures in Table 48 of 434 vehicles and 405 vehicles given, from my own observations, the sensor cable forming part of the measurement device used at the time was removed from the road surface within a few days of being installed in Segment 1 near Sutton Road.

I have previously drawn the increase in traffic to the attention of Yass Valley Council and made certain recommendations to alleviate its effects.

9. In summary, the traffic flows along the proposed transport route are markedly greater than those reflected in the EIS and this must affect the assumptions and assertions that are made in the EIS.

10. For example, it is simply incorrect to say "[h]eavy vehicle volumes appear to be relatively well-dispersed across the local network and there does not appear to be any one road that could be considered to be carrying too many heavy vehicles or that could be expected to become notably congested or have capacity issues due to the addition of construction traffic." In fact, all of the heavy vehicle traffic other than that travelling towards Gunning uses the route proposed for the proposed solar development. This is not least because that route is the only route that does not have a weight limitation on it, though the reasons for the lack of a weight limitation are very cloudy indeed. There is no doubt whatsoever that the "additional construction traffic during the relatively short construction period" will not be "easily accommodated" as suggested at page 143 of the EIS.

11. Indeed, I would go so far as to suggest that the movement of the proposed construction traffic through the actual village of Sutton in conjunction with the already increased traffic mentioned above would be approaching chaotic, particularly during peak hour periods. Also the EIS makes very little mention, if at all, of the presence of Sutton Public School that faces on to the proposed route and which does not contain a pedestrian crossing over the proposed route. Real concerns have been expressed over the recent increase in traffic and its safety consequences for school pupils. This will be exacerbated by the projected increase in light and heavy vehicle traffic associated with the SSF should that development come to fruition. In this respect, I assume that some of the street signage proposed to be removed due to heavy vehicle passage through certain turn locations in the village would include the school speed signs at the corner of Bywong and Victoria Streets. (See the second item in Table 50 148 of the EIS).

12. The Traffic and Transport element contained in Part 14 of the EIS seems to focus on the relatively short (2 km) Tallagandra Lane element of the route as opposed to the whole of the route starting at the Federal Highway (14 km) (noting that "East Tallagandra Lane" is quite separate and distinct from "Tallagandra Lane"). For example, the following statements are made at pages 143 and 150 of the EIS:

"In particular, Tallagandra Lane is known to have a low amount of existing traffic overall (light and heavy vehicles) and the additional construction traffic during the relatively short construction period is expected to be easily accommodated."

"[I]t is not expected that these additional vehicles would affect the Level of Service experienced on local roads such as Tallagandra Lane"

13. Noting that the "easily accommodated" aspect would require changes to Tallagandra Lane as set out the EIS, it is true that there is far less light vehicle traffic on that small element of the proposed route. But that is neither here nor there given the amount of existing traffic consisting of both heavy and light vehicles on by far the majority of the proposed route of 14 km. In the short, contrary to the statement made at page 150 of the EIS, the majority of the local roads in the area (and particularly those along the proposed route) are not "generally low traffic".

14. As an aside, I doubt whether "car pooling" and "shuttle bus arrangements" with a view to minimising vehicle numbers during construction would be utilised as most, if not the entire workforce, would likely be driving themselves. (EIS page 152)

***Miscellaneous comments***

15. I have a number of miscellaneous comments and these are set out below:

- I take issue with the statement on page vii of the EIS that "the operation of the project is expected to be compatible with the current adjacent land uses." It would not be so compatible as any comparison of a photograph of the area in its current use with a digital representation of the same area incorporating the SSF would have shown. However no such visual comparison is made in the EIS.
- At page ix, the EIS states that "[the] Site does not lie on an area designated as bushfire prone land'. I am not aware of its designation or otherwise, but as residents of the district well know there was a very serious bushfire at the western end of East Tallagandra Lane some 2 km from the proposed solar site in January 2017. This fire caused a good deal of damage to infrastructure and threatened several properties. It was extinguished through the good efforts of the Rural Fire Service including through the use of extensive water bombing. It would be wrong to underestimate the threat of a bushfire in the area of the proposed development.
- At page 9, the EIS asserts, "[t]he project has received broad support from the local and regional community and Yass Valley Council". I have attended a number of meetings concerning the proposed solar development and have seen no evidence of that broad support. As to the Yass Valley Council, there is a distinction to be made between the elected Council and those employed by the Council. I stand to be corrected but it is my understanding that the matter of the SSF has not been before the elected Council and the elected Council has not passed a resolution supporting the development.
- Section 2.3.4 of the EIS concerning the "Do Nothing" option is a furphy. Nobody is suggesting that further solar capacity should not be

developed in New South Wales. What is being suggested is that the site selected by the proponents is totally unsuitable and the proponents should look elsewhere for more suitable sites, particularly in areas identified by the New South Wales Government. However, there is one element of the proponent's consideration of the "do nothing" option with which I do agree and that is that doing nothing "would leave the Site in its current agricultural land use, which is largely dominated by livestock grazing ". That would be a commendable outcome.

- Page 49 of the EIS asserts: "Of the survey forms handed in, 50% per cent supported the project, 28% did not support it, 11% were undecided and 11% did not state their position". I have a number of reservations concerning these statistics. First, a fundamental element is missing and that is the number of survey forms that were actually handed in. Without this missing element, the asserted statistics carry little, if no weight. Of relevance also is the number of survey forms that were actually handed out. In this respect I note that the survey forms were handed out at the First Community Information Session held on 7 December 2017 at which "an estimated 40-60 people attended".
- I do not claim to have expertise in the natural sciences. That said, I am not convinced by Part 7 of the EIS concerning Biodiversity. For example, in relation to the diurnal bird survey referred to on page 67 of the EIS it is not actually clear to me as to how much effort was devoted to the survey. What does a "4 x 20 - 60 minute bird survey as well as opportunistic observations " entail? Is a "four person hour" search of tussock grasses for the striped legless lizard adequate? These are not questions I can answer but given the importance of the maintenance of biodiversity nationally, regionally and locally, I urge that Part 7.0 of the EIS be given very careful consideration in terms of its adequacy. In this respect, the proximity to, and possible plant and animal connections with the close-by Mulligan's Flat Nature Reserve cannot be ignored.

### ***Conclusions***

16. I have not attempted in this submission to cover all aspects of the Springdale Solar Farm proposal. However, for the reasons stated above I urge that the State Significant Development Application relating to this proposed solar development be refused. While development of further solar power generation capability is undoubtedly to be commended, industrial sized solar



power developments such as the Springdale Solar Farm are totally out of place in a close-knit rural and farming community such Sutton.

Bill Campbell QC

23 August 2018