Context for objection:

Our small rural property is within one kilometre of the south-western boundary of the proposed development. Our home (although beyond the one kilometre zone) and other parts of the property (including a proposed new double-storey house site) have a clear line-of-sight to the Springdale development (including the proposed sub-station). The house has an elevated position in the landscape, part of which overlooks the proposed development. Access to our property from Sutton Village or Canberra requires travelling through the development zone, which will occupy both sides of Tallagandra Lane.

Because of the direct and ongoing impact on our property, we OBJECT to the current proposal to build an industrial scale development, on the following grounds.

Rural values:

In land use planning, there should always be a presumption against significant changes in land use, or introducing inconsistencies, unless it occurs as part of an established statutory framework of planning, characterised by genuine consultation and local decision-making. In the current case, the solar farm proposal would establish a very large-scale and visually-intrusive industrial site in the middle of rural farmland, and represents a considerable change in land use (despite the term "solar farm") and affect the legitimate expectations of surrounding residents (based on the application of planning laws to date, and reinforced recently by the Yass Valley Council's RU6 development buffer zone).

The sheer scale of the development--which according to the proponent will comprise more than 350,000 solar panels and a sub-station with a 100 x 100 metre footprint—is an industrial facility that is inconsistent with local land use (in scale and form), and that traduces the rural landscape amenity that is the basis of many people choosing this area to call home.

Visual amenity:

The development site itself is overlooked by several properties at a higher elevation (including ours, and several other neighbours). Due to topography of the site, it is unlikely that plantings on the development site will ameliorate the impact on us (our suggestion to the developers that mitigation plantings on other properties, including our own, have been disregarded).

We are also concerned that the width of proposed landscape buffer plantings is too narrow to effectively conceal the large fences proposed. Wider planting belts would allow for greater species diversity and contribute ecological offsets. We have also suggested that boundary faces could be placed on the inside of the plantings (rather than at the site boundaries), and we have asked for smaller, less intrusive fencing to be used.

Since our own visual amenity is most likely to be affected by construction of the sub-station and panels South of Tallagandra Lane, we are particularly concerned that the proponents haven't been able to answer any questions about its actual size, height, design, construction material or colour. One off-hand comment at a public consultation suggested that it could be "two to three storeys high, we just don't know until we go to the next stage after approval". This absence of key information makes it very difficult to assess the likely impact.

While there are existing intrusions in the landscape, most notably powerlines, these tend to disappear into the background. The concentrated form of the solar farm—massed blocks of hundreds of thousands of black panels—will not be able to be so easily accommodated.

Noise and vibration:

The development is said to include driving tens of thousands of piles to anchor the 350,000 solar panels (noting that there are no published particulars of the infrastructure that is actually planned).

Although the construction period is finite (possibly up to six months), it can still be expected to be highly disruptive to neighbours. The soil structure and topography in the valley appears to be one that readily transmits sound and vibrations (as we know from every time roads are graded in the area), and so pile-driving may be an especially disruptive construction method. Similarly, the excavation works required to grade, trench and bury thousands of inter-connecting electrical cables will also have a negative impact on neighbours, many of whom (like us) work from home.

The development is planned to last for thirty years. On an ongoing basis, the constant noise associated with the thousands of motors as they reposition each individual panel throughout the day is unknown. We understand that the developers are planning several large containment walls to mitigate some of the noise expected, which have then been factored into the noise abatement heat map to reduce the sound impact. To justify this expense, we can conclude that the physical effort involved in moving each panel (essentially, each one a large air-catching "wing", with pivot points subject to dust and rust) would not be insignificant, and potentially noisy. The visual impact of the sound-abatement walls is unknown, as no designs are available.

The noise impact of the sub-station is also unknown. However, it is unlikely that transformers and switching gear would operate in silence. The positioning of the facility on top of a hill may exacerbate any noise problem, as well as being unsightly.

Traffic:

The EIS and community consultation presentation sessions held by the proponents incorrectly identified only "minor" traffic movements on Tallagandra Lane. However, the traffic statistics quoted are more than 15 years old (before sub-division of properties within the valley) and therefore under-estimate significantly both the effect of construction traffic on commuters, and the numbers of people who will be affected by the diminution of visual amenity as we wait for trees to grow around tall chain-mesh fences.

Our good-will suggestions to the proponents that they tar 2-3 km of the road (North and South of the development)--to improve safety, to reduce dust in vicinity of the panels, and to offset in a tangible and meaningful way the impact of the development on many of those most affected—has to date not been taken up.

Impact of sub-station:

As noted above, we have insufficient information about the visual and noise impact of the sub-station, proposed to be on top of a hill. Visually, due to its size and location, the sub-station may end up being one of the most impactful components of the development from our perspective. Accordingly, the lack of specifics about this aspect of the development is breath-taking.

For us, this omission significantly undermines the genuineness of the consultation and is a fundamental weakness of the EIS in addressing the statutory provisions of the Act.

Water:

Local bore water, which is calceous and high in iron and salt, will likely be unsuitable for washing the solar panels to ensure their ongoing efficiency in a notoriously dusty local environment.

A prohibition on use of bore water, dam water and stream water should be imposed to prevent wastage of this most valuable of local resources (other than for initial establishment and maintenance of vegetation belts, and for watering of stock).

Aboriginal heritage:

The EIS under-estimates the cultural and archaeological significance of the valley, which is rich with indigenous artefacts and is thought to be a well-established ancient trade route between the Coast, the Snowy Mountains and Brindabella Ranges, and out to the west. We raised this issue with the developers at a community consultation, and they have told us it will be managed by the construction contractors "if issues arise". They propose no checks other than to "leave it to the professionalism of the contractors".

However, the archaeological and cultural heritage survey appears to be have been undertaken at a cursory level, seemingly unaware of the context noted above--even though there are scar trees nearby, indicating intensive use. This inconsistency points to this component of the EIS needing to be re-done (and independently supervised) before planning consent can be considered.

Consultation:

Disappointingly, the proponents have been unwilling to engage beyond a cursory level with individual residents whose dwellings are beyond 1km of the boundary of the development area—our concerns are "noted", but never responded to directly or answered with any accuracy (only broad assurances). While the developers may argue that their approach conforms the technical requirements of their statutory responsibilities, it has meant that many of the issues raised above remain unaddressed or unresolved.

Many neighbours support solar power as part of Australia's energy mix—however, the current process leaves us feeling uncertain as a community, and having little confidence in the accuracy of the EIS, or in the genuine commitment of the proponents to deal fairly with issues that will inevitably arise over the 30+ year lifetime of the development (including its upkeep, maintenance of the site plantings, how the site will be remediated if destroyed by bushfire or becomes uneconomical to maintain, managing its possible sale and its eventual end-of-life decommissioning).

All of these "future issues"—particularly doubt about how they will be handled past the point of planning approval--are additional "aggravating factors" we would wish the decision maker to bear in mind. In our view, these factors add weight to a cautious approach—namely a decision not to give planning consent to the development.