

Submission to NSW Department of Planning, Industry and Environment

Stubbo Solar Farm

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Stubbo

NSW 2852

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Abbreviation

EIS Stubbo Solar Farm Environmental Impact Statement, December 2020, UPC\AC
Renewables Australia

Renewable Energy

The generation of electricity from renewable energy sources, such as solar energy, is a vital part of Australia's future energy strategy. Like all developments, solar farm developments must preserve the amenity and character of the region.

Community and Stakeholder Engagement

My first knowledge of the Stubbo Solar Farm proposal was not a letter but a fact sheet on the proposal, that was in an envelope with a hand-written address on the front and the wrong surname, that was attached to my gate in September 2020. On reading the detailed information in the EIS it has become quite clear how much I have missed out on by my property not being included in the detailed consideration of the impact on close neighbours, and from not having been contacted earlier.

The EIS claims, “UPC made attempts to get in touch with all immediate project neighbours” (EIS, Appendix B Community Stakeholder Engagement Plan, Section 3.3). My view is that these attempts were not satisfactory. All of my property is within 2 km of the development site, with the closest boundary at 500 m (EIS, Figure 11.4). Impacts on my property need to be added to the proposal.

Consultation has started more recently. I met two staff members from UPC\AC Renewables Australia on 28 January 2021 and two staff members visited my property on 18 February 2021 in order to interpret the draft viewshed analysis. We have also communicated by email between those dates.

In summary, consultation with me was not been timely nor satisfactory prior to the submission of the EIS. The developer seems to be sincere in their acknowledgement of this and their desire to remediate this situation.

Biodiversity and Transport Assessments

At a meeting of neighbours and UPC\AC Renewables Australia staff, held on 28 January 2021, the staff members verbally informed the neighbours that an upgrade to width of Blue Springs Road from Cope Road to the Solar Farm entry point may be part of the modified proposal after the submissions phase of the proposal. This would be done because Blue Springs Road is narrower than recommended by AustRoad Guidelines (also noted in EIS Executive Summary page 7).

The proposed upgrade to Blue Springs Road would be in areas that are outside the biodiversity plot locations (EIS, Appendix C Biodiversity Development Assessment Report, Figure 5) therefore have not been assessed in the current EIS. Road reserve vegetation at proposed access sites were noted to include plant community types in moderate-good condition (Table 14). Significantly longer stretches of road reserve vegetation would be impacted by the road upgrade therefore would need to be assessed for biodiversity impact.

In summary, road safety is of utmost importance to the community and visitors. The proposed upgrade to Blue Springs Road is welcome but needs to be assessed with respect to potential loss of valuable ecological communities, with the potential for a higher number of ecosystem and species credits requiring offsets as a consequence of the upgrade.

Landscape Character and Visual Assessment

Additional land was added to the north of the original project site after the Scoping Report (Stubbo Solar Farm Scoping Report 1.3, UPC\AC Renewables Australia, 7 April 2020) was submitted in April 2020. The EIS reports that before increasing the development footprint to the north, “UPC\AC directly engaged with the closest neighbours ... No specific comments were raised following this targeted consultation” (EIS 3.4.1), however, I am one of the closest neighbours, and I was not consulted.

Draft viewshed analyses for my property indicate that close to 20% of the solar farm area under panels will be visible, which amounts to approximately 150 – 200 ha of visible panels. Nearly all of the visible area is in the northern extension. Given the topography of the relevant area, tree plantings would not mitigate the visual impact (discussion with UPC\AC Renewables Australia staff on site, 18 February 2021).

The solar farm is in close proximity to my property, leading to a high visual sensitivity (EIS, Table 11.1), the view will contrast with the background or setting, leading to a high visual effect (EIS, Table 11.2) thereby giving a visual impact rating of High Impact (EIS, Table 11.3). Furthermore, the Mid-Western Council requires that land zoned as Primary Production should, “maintain the visual amenity and landscape quality of Mid-Western Region by preserving the area’s open rural landscapes ...” (EIS, Section 11.2.1). Assessment of visual impact on scenic vistas is also required (EIS, Appendix A Secretary’s Environmental Assessment Requirements and Agency Comments, page 4).

Overall, I must disagree with the statement that, “visual impacts associated with the project are generally considered low or negligible”, (EIS, page 6).

In summary, the northern extension of the proposal will have a high impact on my property with visual amenity severely reduced. Scenic vistas will be heavily impacted and the landscape will not be in keeping with the Mid-Western Council’s goal of maintaining visual amenity and landscape quality. I object to the northern extension of the proposed solar farm.

Noise and Vibration Assessment

My property was not included in the Noise and Vibration Assessment Report (EIS, Appendix G). Furthermore, the noise monitoring locations (EIS, Appendix G, Figure 2) show that the monitoring was done at locations closer to roads than my property and that the monitoring near Blue Springs Road was done adjacent to noise-reflective hard surfaces (EIS, Appendix G, Figure 4). Indeed, my property may be closer to the proposed sites of the panels than the non-associated sensitive receivers that were identified in the EIS.

Staff from UPC\AC Renewables Australia have more recently agreed to complete the noise and vibration assessment for my property (Zippel, letter by email, 12 February, 2021).

In summary, I object to the proposal moving forward without an assessment of the noise and vibration impact on my property and the development of a suitable remediation plan, if needed. Removal of the northern extension to the development would likely mitigate the risk of noise and vibration impact.

Bushfire Risk

In the preliminary hazard analysis it was reported that, “vegetation that forms a bush fire threat exists in all directions on and surrounding the study site” (EIS, Section 15.2.3). The likelihood of lightning strike (EIS, Section 15.3.1, Table 15.6 and EIS, Appendix J Hazard Identification and

Analysis, ID 17) was assessed as “very unlikely”, with the same rating being assigned to the risk of bushfire (EIS, Section 15.3.1, Table 15.6 and EIS, ID 7, Appendix J Hazard Identification and Analysis), and the consequence rating for both being “major” including potential loss of life. In reference to State Environment Planning Policy No 33, the “highest risk level associated with the project is medium” (EIS, Section 4.2.15.1), however this assumes that the likelihood of lightning strike and bushfire is “very unlikely”.

Unfortunately, I know from experience of living here that the likelihood rating is not correct. There have been two quite large fires, with one involving the loss of hundreds of sheep, that were caused by lightning strikes on The Pinnacle property. The most recent one was a strike within the proposed project site. Furthermore, Beryl Solar Farm recorded a lightning strike in December 2020. Therefore, the “very unlikely” rating of the likelihood has been substantially underestimated. I am concerned that a lightning strike with the solar farm in place would increase the fire risk to my farm and those of my neighbours, because the Rural Fire Service will need to gain access to the secured site very rapidly, and will not be able to cross the security fence line, which will be constructed from chain-link or mesh (EIS, Section 2.3.7), with the same ease that they are able to cut through farm fences in order to access a fire front. Therefore, a fire within the project site may develop into a major fire front before escaping the perimeter control zones. Such a fire could get onto my property very quickly. Neighbouring properties would be at similar risk.

I note that the proposed Bushfire Management Plan (BMP) will address the risk to the solar farm itself and not the risk to the surrounding district, “The Project’s BMP will detail the management measures to mitigate impacts on the operation of the project from bushfires” (EIS, Appendix E Land Use Conflict Risk Assessment). EIS Sections 15.1.1 and 15.3.3 also appear to focus on bushfire risk to the solar farm and not to neighbours.

I understand that consultation with the Rural Fire Service and Fire and Rescue NSW would be part of subsequent processes, should the development proposal move forward, however the impact of fire is a very serious matter to landholders and, in making a considered response to the proposal, I need to understand how the bushfire risk to neighbours will be mitigated.

In summary, I object to the proposal moving forward without a compelling plan to mitigate the risk of bushfire to neighbouring properties.

Concluding remarks

I have provided comments on

- Renewable energy
- Community and stakeholder engagement
- Biodiversity and transport assessments

I have raised objections with respect to

- Landscape character and visual assessment
- Noise and vibration assessment
- Bushfire risk