

Sutton Solar Action Group (SSAG)

Our work in 2018

As 2018 draws to a close, the group would like to bring you up to date on our progress. There is no way of knowing how long the process will go on, but our team will continue to oppose this development no matter how long. We believe the better our arguments against the development are, the more our chances increase to defeat this development. One thing that we all need to bear in mind is there are developers watching this project to see what the outcome is. If you don't want this area overtaken by development, then let's show them all that this community won't be pushed around, and we will fight to protect what we call home.

Here is our summary for 2018. If anyone would like to see any of the documents or have ideas or comments, please share them with us. We would be more than happy to talk with you.

February	
20	SSAG Representatives meet with Mayor
22	1 st Community meeting – very well supported
28	SSAG Representative attended NSW Government Community Cabinet meeting in Goulburn, spoke to Minister for Planning and Deputy Premier
March	
7	SSAG representatives meet Federal Member Mike Kelly in Gundaroo, provided him a list of objections
May	
	Sutton Chatter article – up to 75 heavy vehicle movements per day planned through Sutton Village
June	
27	Yass Valley Council passed resolution to reject any further wind energy projects until each project is evaluated
29	SSAG wrote to NSW Ministers for Environment, Energy and Planning <ul style="list-style-type: none"> ○ Energy, no response ○ Environment, no commitment to action ○ Planning, see below Sutton Chatter article – Springdale development raises matters of national environmental significance
July	
	Sutton Chatter article – NSW Energy Minister supports renewable energy zones (REZ's)
August	
2	2 nd Community Meeting – attended by Deputy Mayor Kim Turner and Cr Geoff Frost who told us we raised very important issues and provided advice and ideas on other strategies. Copy of presentation was sent to all council members
7	Department of Planning and Environment (DPE) staff visited the project site and resident's homes adjacent
8	SSAG representative met with Senior Advisors for Minister for Planning – impressed with our list of objections, however no commitment on action
22	SSAG representatives addressed YVC meeting and outlined our objections
22	YVC meeting resolved to provide a submission for the proposed Springdale development which supported our objections, this is a change from their previous position
29	Submissions for Springdale project closed Sutton Chatter article – Springdale solar development Environmental Impact Statement lodged
September	
21	SSAG Representative meet with Deputy Premier John Barilaro Sutton Chatter article – Council voters to make submission to NSW Government on Springdale development
November	
12	SSAG representatives meet with Local Member Pru Goward, supportive of position SSAG made submission to Commonwealth Senate Inquiry: Australia's faunal extinction crisis Sutton Chatter article – Update on Springdale project
December	
	Sutton Chatter article – Springdale Solar development's potential impact on threatened fauna

So, what's next?

- ✓ Submissions are still being reviewed by Renew Estate, they will prepare a Response to Submissions (RTS)
- ✓ The government departments who provided submissions will review the RTS to see if Renew Estate has

addressed their questions, this continues until departments are satisfied

- ✓ Renew Estate has recently advised the DPE that no response would be provided prior to Christmas and the DPE contact thinks it is unlikely that the RTS will be received before the end of January
- ✓ Once the RTS is finalised the DPE will prepare an assessment based on the EIS, submissions and the RTS
- ✓ When completed the DPE sends the assessment to the Independent Planning Commission (IPC)
- ✓ The Community will meet with the IPC, this is where we will have an opportunity to speak against any aspect of the assessment you disagree with. We certainly will be. Anyone can speak (you must register to speak) and we would like as many of you as possible to attend this meeting to support us and show our strength. It will be held here in Sutton, date and location will be advised when we know more. We will be pushing for the meeting to be out of work hours so that people can attend.

As a refresher here is a list of reasons why this proposed project **should not be in Sutton**, they are in no particular order other than grouped by themes:

Residents and YVC, NSW and ACT governments

- The Sutton community overwhelmingly opposed the proposed development with only three (3) supporting.
- Yass Valley Council (YVC) do not support this development and have raised similar concerns as SSAG.
- The location is inconsistent with the Yass Valley Settlement Strategy and will negatively impact on the visual amenity of the area.
- YVC has proposed a 5km RU6 exclusion zone/buffer zone around the ACT border to protect the regions agricultural heritage and visual amenity.
- NSW Office of Environment and Heritage (OEH) strongly supports the recommendation of a 5km wide RU6 transition/buffer zone and believe it is clearly justifiable from an environmental viewpoint.
- The ACT government supports the 5km buffer zone around their border to show the separation of NSW and ACT.
- The proposed development contravenes the NSW Department of Planning and Environment's own DRAFT Large-Scale Solar Energy Guidelines.

Environmental

- This project violates both federal and state environmental key threatening processes:
 - Clearing of native vegetation
 - Loss of hollow-bearing trees
 - Removal of dead wood and dead trees
 - Alteration to the natural flow regimes of rivers and streams and their floodplains and wetlands.
- The development is a 'controlled action' under the EPBC Act.
- The proposed development is located 3.5km from the NSW border with the ACT.
- The NSW/ACT border runs along Mulligans Flat Nature Reserve and the Gorooyarroo Nature Reserve.
- Together the two reserves (totalling about 1500 hectares) make up the largest and most intact contiguous area of Yellow Box – Red Gum Grassy Woodland reserve in public ownership across the original range of this community type in Australia.
- The rampant bulldozing of native vegetation and destruction of habitat to make way for numerous suburbs in the northern area of the ACT in the past 15 years has pushed even more native fauna into our region.
- The proposed 5km RU6 transition/buffer zone is to separate NSW and the ACT and retain the rural landscape and prohibit intensive development (**350 hectares of solar facility is intensive!**).
- The OEH considers this area to have high environmental values and contains important regional biodiversity corridors to connect to other regions of NSW.
- The proposed site is surrounded on the north, west and east sides by NSW biodiversity corridors and in the south by Mulligans Flat and Gorooyarroo Nature Reserves.
- This proposed site is also within the Greater Gorooyarroo Strategic Planning Area.
- The EIS identified five threatened species, but there may be others present.
- There are small areas of endangered ecological communities.
- Is in a Birdlife Australia key biodiversity area (south-west slopes of NSW).
- The proposed site is within the Great Eastern Ranges (GER) Kosciusko to Coast area.
- According to the Great Eastern Ranges (GER) website the **NSW section of the GER alone contains 59% of NSW threatened animal species and 64% of NSW threatened plants.**

- The entire site has a variety of trees with an estimated 86 hollows (14 of which are suitable breeding habitat for not only superb parrot, but other species).
- The scattered paddocks trees within the development envelope provide a corridor or 'stepping stones' between the biodiversity corridors on both sides and provide habitat for many species, not only threatened species.
- The golden sun moth and the superb parrot are not the only fauna on the site, what about all the other animals, lizards, kangaroos, echidnas, turtles etc that move across the site what happens to them when all these man-made objects such as 2.2m fences, buildings, steel piles and roadways are placed in their way?
- Residents surrounding the proposed site have voluntarily taken part in the Save our Species program for threatened Glossy Black Cockatoo by planting large areas of allocasurina's.
- NSW Biodiversity Conservation Investment Strategy 2018 has identified this area as a Priority 2 (1 being the highest and 5 the lowest) area for investment.

Land, water and erosion

- This area is not in, nor, has ever been in a Renewable Energy Zone (REZ) refer to the [NSW Submission to AEMO Integrated System Plan](#).
- NSW government has been aware of preferred solar resources precincts since 2010!
- AEMO's ISP released in July 2018, endorsed the NSW REZ's [AEMO ISP Final Report](#).
- AEMO's ISP stated there should be no further renewable energy development in the region due to lack of community support.
- Approximately 500-600 trees will be removed to make way for solar arrays.
- Removing all the trees to make way for solar arrays will be like clearing the landscape and replacing it with 350 hectares of glass, lots of roadways, 24 buildings and other ancillary structures.
- Removal of these trees will increase the erosion risk especially the large radiata pines along Back Creek.
- A causeway is planned to be built across the lowest part of the floodplain, which contravenes a KTP.
- Considering the document for approval of a project is called an '*environmental impact statement*' there are **no detailed earthworks** for the project!! How would you know what the environmental impact will be without knowing what Renew will do! Renew Estate propose looking at this once approval is given! The NSW government has asked for a full earthwork plan to be submitted.
- There is no onsite water, the NSW government has asked for the water requirements for the life of the project.
- The AACHIA showed at least half the site is of high archaeological sensitivity (the consultant neglected to carry out the necessary sub-surface investigations). A full sub-surface report will be provided along with the RTS.
- The site sits at the bottom of a 3500+ hectare catchment area for the Yass River, several streams run through the entire site.
- The lowest point of the site is 600m and rises to at least 660m.
- Is productive agricultural land

Traffic, roads and safety

- The heavy vehicle route is through a 40kmph School Zone, and then through our village which has three (3) 90 deg bends in 770m. The EIS has no concerns about the causeway as you leave the village.
- Renew proposes to remove some road signs to allow heavy and oversize vehicles to manoeuvre the bends.
- One family is bounded on two sides by the proposed development and only access is through the proposed development!
- There is a high-pressure gas pipeline running through the entire site and because of the land use change from agriculture to electricity generation a safety study had to be conducted. The owner of the gas pipeline was not consulted during the preparation of the EIS. A safety study has been carried out alongside the EIS.
- An interstate fibre optic cable runs through the entire site, it hasn't been mentioned in the EIS.
- Waste disposal arrangements for construction waste, there are no local waste disposal sites able to take this amount of waste, and YVC has stated that Gundaroo waste transfer station is unsuitable.
- The site is in a bush fire prone area.
- Small- and large-scale photovoltaic installations present "unique electrical hazard risks" to firefighters and are high voltage hazards.

Visual

- There are 34 residences within 2 kms of the site.
- The proposed site is like an amphitheatre and will not be able to be screened.

- the EIS has grossly underestimated the visual impact, which we will address in the IPC meeting.

As you can all see the group has been very busy throughout the year. It may seem like nothing is happening but in the background the work continues. Most of the time is taken up with monitoring the media to keep up to date with what's happening regarding renewable energy and the environment. Much of the media provides us with areas to research and in many cases provide supporting arguments that SSAG can use to back up our objections.

Since Renew lodged the DA for the project we have been able to carry out a lot of research to help us build a body of evidence that will be used in presentations to the IPC. If anyone has a particular interest in any of the areas of objection listed above and would like to help out by furthering research, please contact Dianne Burgess on dianne_mark@bigpond.com or 0407 449435.

Current work: these are just two of the issues,

In depth analysis of the EIS looking at various sections to fact check many of the statements made by AECOM and other consultants. There are some claims that aren't correct or are played down to suit the client and, in some instances, relevant information that just doesn't appear. It isn't until you have the time to read through the various sections and think things through that particular points stand out and prompt further research.

The other area of research is the visual impact assessment and how AECOM came to the conclusions they did! It may or may not surprise you that there is NO standard for visual assessment in Australia. Visual assessments are based loosely on versions of visual assessment processes that includes the UK and the US, which then becomes the pseudo 'standard'. They call themselves 'visual experts', which is a stretch. These 'standards' are interpreted and applied very differently by various consultants. Visual impact assessments play a large part in the assessment process yet there is absolutely nothing consistent or substantive about them.