

Our aim is to protect our rural landscape and the biodiversity of this area for the benefit of all.



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THE SPRINGDALE SOLAR ELECTRICITY GENERATING FACILITY SSD 8703, At a glance:

<p>is NOT a permitted activity</p> <ul style="list-style-type: none"> in RU1 zoning of the Yass Valley LEP 2013 	
<p>Is INCONSISTENT with the:</p> <ul style="list-style-type: none"> Aims of the Yass Valley LEP 2013 Objectives of the RU1 zoning in Yass Valley LEP 2013 Yass Valley Settlement Strategy (YVSS) 2016-2036 South East and Tablelands Regional Plan Proposed 5km RU6 'buffer zone' round ACT/NSW border NSW renewable energy zones (REZ's) priority zone is for New England reg NSW OEH assessment of this area (in YVSS) being critical in maintaining biodiversity corridors for the remainder of the state. <p>Is ONLY ALLOWED because</p> <ul style="list-style-type: none"> State Environmental Planning Policy (SEPP) Infrastructure 2007 – prevails over all of the above. Basically, it says anything can be built on any land in NSW, even those areas with high environmental value. 	<p>Is INCOMPATIBLE with the:</p> <ul style="list-style-type: none"> existing, approved and likely preferred land uses in the following ways: <ul style="list-style-type: none"> Will have an adverse impact on the rural character of land in the vicinity; Will have an adverse impact on the residential and rural-residential uses in the vicinity; Will have adverse impacts on the agricultural uses in the vicinity; and Will have adverse impacts on tourism uses in the vicinity, <p>The measures proposed by Renew Estate will not avoid or minimise the incompatibility of the proposed Springdale development with the rural character and the residential, rural-residential, agricultural and tourism uses in the vicinity of the proposed large-scale solar electricity generation facility (does not meet the SEARS requirement under 'Land') refer also (<i>GRL v minister LEC 2019 7, 58-82</i>)</p>
<p>Is NOT SUPPORTED by:</p> <ul style="list-style-type: none"> Sutton residents (62 objected, 3 supported) Yass Valley Council 	

<p>Communications since 2017 by:</p>	
<p>Sutton Solar Action Group (SSAG)</p> <ul style="list-style-type: none"> 19 monthly articles in Sutton Chatter (latest February 2020) 2 x public meetings (Feb 2018, Aug 2018) 2 x letter box drops Website created mid-2019 to collate all SSAG information and readily accessible to anyone Regular updates posted on website (emailed to mailing list at least one per month) latest 5 Jan 2020 SSAG attended all Sutton District Community Association (SDCAI) bi-monthly meetings to provide updates <p>Since 2017 there has been ongoing communications between the community and the SSAG.</p>	<p>Renew Estate</p> <ul style="list-style-type: none"> 5 x Newsletters (last Aug 2018) 2 x Drop-in sessions (Dec 2017, Aug 2018) to SSAG March 2018, no follow ups last emails to adjacent landholders only was Sep 2018 23 December 2019, Renew Estate emailed only seven people, NOT the community, with this message: <p><i>... 'We wanted to let you know that Renew Estate has been continuing to progress the development of the Springdale solar farm and the other projects we are developing in NSW.</i></p> <p><i>We remain committed to the development of the Springdale Solar Farm. Together, with our partners we expect to complete the project's additional planning studies in early 2020.</i></p> <p><i>We anticipate being able to make further detailed announcements on the development pathway for the project in the new year...'</i></p> <p>Between September 2018 and 23 December 2019 there is a 15-month gap of absolutely no contact between Renew Estate and the adjacent landholders or the community. The above was not an update; it was only at DPIE's request.</p>

Renewable Energy Zones (REZ's): nothing new, have been known for a decade

- **2010** NSW Government commissioned study to find suitable locations for large-scale solar- **This region rated the lowest for electricity generation out of the 15 areas selected.** AECOM prepared the 2010 study for suitable areas and told the NSW government this region wasn't suitable, **YET in 2019** the Springdale EIS also prepared by AECOM, says it has some of the best resources in the world!!! **How can you trust this company!**
- **2015** – Transgrid held the NSW large-scale solar workshop. In conjunction with NSW government the New England region was highlighted as a prime area for developing renewable energy generation.
- **2017**– Finkel Report highlighted potential areas for REZ's, again reflect the 2010 and 2015 areas.
- **2018 (March)** – NSW Government submission to AEMO's Integrated System Plan, again highlighted the same areas as 2010, 2015 and Finkel Report.
- NSW Infrastructure Strategy – 2018 included same REZ's as previous

Given that all this knowledge was available to all developers as well as known by AECOM, why would any developer choose this location? Certainly, it is not driven by the states need, it is purely a business decision between two parties.

Over the past 12-18 months the location of these developments has become even more relevant due to emerging deficiencies in the transmission system. Noting, of course that Transgrid's only obligation is to connect facilities to the electricity network, nothing more. Whether a facility actually participates in producing output isn't their concern.

It has been stated by Transgrid, the NSW Energy Minister and even the DPIE's Executive Director of Resources Assessments and Business Decisions, that only one in 20 projects can be connected to the grid. Transgrid themselves talk about some of these renewable energy developments becoming 'stranded assets' due to the inability to participate in the NEM, WE DO NOT WANT A WHITE ELEPHANT SITTING IN OUR VALLEY.

As recent as September 2019, many large scale solar facilities have had the generation output slashed by AEMO <https://reneweconomy.com.au/aemo-slashes-output-of-five-big-solar-farms-by-half-due-to-voltage-issues-42232/> and again, in January 2020, with the falling profitability of solar facilities there is a major risk that this development could prove to be a 'lame duck'.
<https://www.abc.net.au/news/2020-01-28/solar-profits-threatened-by-nem-rules-killing-investment/11903706>

Assessment Timeframes for State Significant Development

NSW Department of Planning, Industry and Environment - Annual Report 2018-19, page 9

'In March 2019, the Department met the State Priority of halving the time taken to assess and determine state significant proposals. By June 2019, it recorded an average time of 144 days, a marked improvement from the November 2014 baseline of 298 days. The Department achieved this while maintaining robust processes and meaningful community engagement.'

Number of days for DPIE to review submissions and issue

State Significant Development	LGA	Number of public submissions	Public exhibition closed	Number of days for DPIE to review submissions	DPIE Response to Submission (RTS) request dated	Applicant to respond by:	Days for applicant to respond to DPIE RTS request
Springdale solar SSD-8703 EPBC ID Number 2018/8173	Yass Valley	215	29/8/18		Not requested		Days since exhibition ended = 530 days and counting (as at 10 Feb 2020)
Silverleaf solar SSD-9358	Narrabri Shire	5	1/10/19	NA	None recorded	NA	NA
Quorn Solar SSD-9097	Parkes Shire	41	3/12/19	6 days	9/12/19	20/1/20	42 days
Bonshaw Solar SSD-9438	Inverell Shire	2	4/12/19	2 days	6/12/19	20/1/20	45 days
Jinderra Solar SSD-9549	Greater Hume	106	13/11/19	9 days	22/11/19	13/1/20	52 days
Walla Walla SSD-9874	Greater Hume	145	2/12/19		No date	20/1/20	49 days?

If DPIE's best is 144 days to make a decision, then the Springdale project which as of 10 February 2020 is 530 days and still no RTS has been submitted, means **it is already 386 days over DPIE's average!!!!** **What is going on with the project?**

The completion of **additional archaeological studies** was used as the reason for the **delay of the RTS in December 2018, April 2019 and again in October 2019**. While the SSAG encourages thorough assessment practices, surely if an additional 14 months has not helped finalise these studies then **Renew Estate should be explaining to DPIE what the hold up is.**

Bearing in mind that the additional archaeological studies is only one issue that required a response, what about the numerous other issues that also require responses? What is the status of those?

Having said that, the SSAG doesn't know what all the issues are? We expect that as part of the assessment process a summary of all issues raised in submissions would have been collated by the DPIE, otherwise how would they know if Renew Estate has addressed all the issues raised?

Communication between the Department of Planning, Industry and Environment (and the former DPE)

The Springdale EIS public exhibition period opened on 18 July 2018 and closed on 29 August 2018.

<p>5 December 2018, 98 days after close of submissions SSAG contacted DPE re the RTS.</p> <p>DPE responded and advised the SSAG that Renew Estate had been contacted by the Department a week or so ago and said that Renew Estate would not get back to DPE before Christmas. DPE indicated Renew Estate would likely respond with the <u>RTS towards the end of January 2019</u> as they were still working on the <u>additional archaeological survey work.</u></p>
<p>24 January 2019, 148 days post close of submissions Second time SSAG contacted DPE about progress of the RTS</p> <p>29 January 2019, DPE responded and said Renew Estate was <u>still preparing the RTS</u></p>
<p>11 April 2019, 225 days post close of submissions Third time SSAG contacted DPE about progress of the RTS</p> <p>DPE responded and SSAG was told that the DPE would not be contacting Renew Estate and said Renew Estate was still working on the <u>additional archaeological survey.</u> DPE also said the SSAG could contact Renew Estate if we wanted more information.</p>
<p>4 October 2019, 401 days post close of submissions Fourth time SSAG contacted DPIE about progress of the RTS</p> <p>24 October 2019, DPIE contacted SSAG and informed us they had contacted Renew Estate and the <u>completion of additional archaeological survey was again given as the reason for the delay of the RTS.</u> Renew Estate advised the DPIE that <u>the RTS would be provided by late November 2019.</u></p> <p>DPIE also emphasised to Renew Estate the importance of keeping the community informed and requested that Renew Estate provide the community with an update on the project.</p>
<p>4 December 2019, 462 days post close of submissions Fifth time SSAG contacted DPIE about progress of the RTS SSAG also asked the DPIE what happens next if Renew Estate doesn't lodge the RTS?</p> <p>19 December 2019, DPIE responded and informed the SSAG that the <u>RTS HAD NOT been lodged.</u></p> <p>DPIE also informed the SSAG that they had been in contact with Renew Estate and reiterated to them the importance of keeping the community updated. <u>Renew Estate advised the DPIE that a project update would be provided before the end of year.</u></p> <p><u>DPIE also stated they will consider possible next steps in the new year, including finalising the assessment of the project in the absence of receiving a RTS or any material updates on the status of the project.</u></p>
<p>20 December 2019, 478 days post close of submissions Sixth time SSAG contacted DPIE about progress of the RTS The SSAG acknowledged the possible finalisation of the project as indicated by DPIE as both reasonable and appropriate given the circumstances.</p> <p>The SSAG also stated that after reviewing the DPIE Major Projects website it showed that the average timeframe for assessing the 41 solar developments approved since 2010 was 138 days (from close of submissions to determination). As of 10 February 2020, it is 530 days since submissions closed for the Springdale solar project, and the RTS hasn't even been lodged. THIS IS 386 DAYS ABOVE THE DPIE AVERAGE of 144 DAYS.</p> <p>As of 10 February 2020, DPIE has not responded</p>

Communication with the NSW Office of Environment and Heritage (NSW OEH) and the NSW Natural Resources Assessment Regulator (NRAR) regarding flooding, potential erosion and site access

On 21 March 2019 the SSAG wrote to the NSW OEH and the NRAR regarding our concerns about flooding, erosion and site access for the development. The flooding concern is the result of a roadway that has been completed by the landowner adjacent to the northern boundary of the proposed development, which in effect has created a 'dam wall' (yellow line in image below) across a 1190 hectare floodway. The OEH responded on 26 March 2019 by saying they had spoken with the DPE but wouldn't discuss it with the SSAG. The NRAR has never responded. Whilst not a component of the Springdale development it will have significant impact on the area and the proposed solar facility.

Residents safety

The image below shows the number of residents within 2km of the site, the majority of which would overlook the proposed development as it lies at the bottom of the valley at 600m. The **three red icons** show the number of residents who will **live behind** the proposed solar facility. Nowhere in the EIS does it state that the **only means of access** for these three properties is via Tintinhull Road, **they will have to drive through the middle, and should there be a fire or any hazardous situation they will be trapped behind this development.** 99

