- **Updated Noise Impact Assessment Annexure A**

  - The EIS (Appendix G, page Figure B2) suggested 'noise walls' for 14 of the shipping containers or PCS's, the updated assessment in the RFI shows just six (6) PCS's with 'noise walls'.
  - **If the PCS stands at approximately 4m high and (based on the image in the EIS) it is open along one of the long sides, how can a 2 m high, three sided "horse-shoe" shaped noise walls be of benefit to reducing the noise, especially when those PCS's are lower in elevation than the surrounding area?**
  - Predicted operational noise levels have been calculated for the 35 residents within 2 kms of the site and the results claim that the predicted noise emissions will comply with the most stringent operational noise triggers levels **in all locations** (page 3).
  - However, on page 2 it states ***"Operational noise contours calculated at 1.5 m above ground are provided in the Appendix. These contours are indicative only and should not be referred to for noise levels at specific receiver locations."***
  - In other words, noise levels at those 35 residences which vary in elevation are not known.

Construction traffic is expected to comprise the following number and type of vehicle movements:

- Light vehicles: up to approximately 400 light vehicle movements per day during peak construction (~5 month period)
- Heavy vehicles: up to approximately 30 heavy vehicle movements per day during the peak delivery period (~2 month period).

The previous noise impact assessment assessed construction traffic noise on Mulligans Flat Road and Tallagandra Lane. Table 5 below presents details of the other roads forming the construction traffic routes. It is noted that these roads are all classified as arterial/sub-arterial and therefore a $L_{Aeq,15hr}$ criterion applies (Table 4).

Table 5 Construction traffic noise levels

Road	Speed limit, km/h	Existing daytime (15 hr) traffic flow[1, 2]		Relative noise increase, dB(A)	Distance to nearest residential receiver from road, m	Indicative traffic noise level at nearest receiver, dB(A)
		Light vehicles	Heavy vehicles			
Sutton Road	100	2,392	268	0.6	180	$L_{Aeq,15hr}$ 50
Bywong Street[3]	50	2,204	166	0.7	20	$L_{Aeq,15hr}$ 58
East Tallagandra Lane	50[4]	326	57	2.5	45	$L_{Aeq,15hr}$ 49

Notes:

1. *Based on traffic counts presented in the Traffic and Transport chapter of the Environmental Impact Statement dated 29 June 2018 completed by Yass Valley Council.*
2. *Assumes 88% of the daily 24 hour traffic volume occurs during the 15 hour day (7 am to 10 pm) and traffic is evenly spread throughout the day.*
3. *This assessment is considered to be representative of construction road traffic noise levels on Bywong Street, Victoria Street and Camp Street.*
4. *Nearest house on East Tallagandra Lane is in an area where the speed limit is 50 km/h close to Camp Street.*

Source: RES RFI Report, 3.1 Annexure A, Page 5 of 8

- The light traffic and heavy vehicle traffic figures quoted in the two dots points above are confusing.
  - On page 7 of the RFI it defines 1 vehicle movement as entering and exiting the site. Which on paper looks like half the number of vehicles moving along the proposed route. It quotes 200 light vehicle movements and 38 heavy vehicle movements per day and have also revised the number of oversized vehicles from 16 down to three (3), which again looks a lot less, but doesn't mean that's all there will be. **It should be noted that all of these numbers are only approximations.**
  - Using RES's definition above, the **actual traffic movements will be double** (or more) the figures quoted above:
    - there will be 400 light vehicles, and
    - 75 heavy vehicle movements per day, and
    - an undetermined number of oversized vehicles, and all
    - between the hours of 7am to 6pm Monday to Saturday and 8.00am to 6.00pm Sundays and Public Holidays.

- The speed limit on Sutton Road has only recently been changed from 100kmph down to 80kmph due to the amount traffic accidents including fatalities.
- The traffic counts for Sutton Road and Bywong Street quoted in Note 1 above do not appear in Table 48 of the EIS. Neither does it state where on Sutton Road.
- Note 2 states that the traffic counts are for a 15-hour period (7am to 10pm) and are spread evenly in that time-period.
- Based on this then:
  - 2392 divided by 15 = 159 light vehicle movements each hour, and
  - 268 divided by 15 = 17 heavy vehicle movements each hour
  This is hardly a reliable or reasonable way to measure traffic movements and volumes.
- The SSAG on three separate occasions undertook **actual traffic counts** for four-hour periods during the morning and afternoon peak times i.e 6am - 10am and 2pm – 6pm. (We can supply all data collected)
- Based on our results on average we counted:
- 1435 divided by four (hours) = 359 light vehicle movements per hour (over a four-hour period)
- 99 divided by four (hours) = 25 heavy vehicle movements per hour (over a four-hour period)
  SSAG's traffic counts show a far more realistic picture of traffic volumes that pass through the village.
- **Road traffic noise**, the SSAG believes the DPIE should question the construction noise increase stated in the table above. The variation in the figures does not make sense. Bywong Street is shown as a minimal noise increase at only 0.7, yet the houses, the school and day-care are all within 20m of the road. There is approximately 700m of roadway between entering the village in Bywong Street and leaving the village after the causeway. In this distance all traffic slows from 80kmph to 50kmph, negotiates 4 x 90^{o} bends as well as when school zones are operating. The deceleration and acceleration of an additional 75 heavy vehicles a day will be a significant increase to noise levels.
- The RFI states (page 4 of 8) "***to assess noise impacts from construction traffic, an initial screening test should be undertaken by evaluating whether existing road traffic noise levels will increase by more than 2 dB(A)***".
- Just like the noise level assessment at individual residences above, the figures quoted for relative noise increases are also questionable. How were these figures derived?
- Overall, the information supplied in this document does not provide any value to the assessment.
- **More importantly the community's number one objection was around the increased risk to the safety of road users and pedestrians, yet there has been no consideration of their concerns.**

- **Assessment Annexure B - Viewsheds and Assessment Annexure C - Constraints**

  - In no way do these four images negate the dramatic visual impact this proposed development will have on the current landscape. As we have continually stated the entire area will be changed by the metal and glass irregular shapes and forms of a solar electricity generating facility which is incongruous with the surrounding area.
  - It appears that the developers cannot comprehend the reality of where this development is located and what this means for the two families (and potentially three) R2 and R35 that will **live BEHIND this development**, Tintinhull Road is the only access to these properties. **IT IS NOT A THOROUGH ROAD, THEY HAVE ONLY ONE WAY IN AND OUT**.
  - There is no vegetation screening proposed along the majority of Tintinhull Road which means that these families will drive for almost 2kms looking at these structures. I don't expect anyone would embrace driving through an industrial subdivision to leave or return to their home for the next 35 years which equates to 12, 775 days. The de-humanisation of people by referring to them as just R2 and R35 is rather offensive.

  The amount of effort that has gone into trying to address the community's number two objection about the visual impact only reinforces the fact that these types of development are not pleasing to the eye. As for the proposed mitigation, nothing has been able to overcome how you hide a development that is anywhere from 10 to 50m in elevation difference to the viewer.

  - **Stream orders and water crossings on both the Central Tributary and Back Creek.** The SSAG informed the DPIE, OEH, Yass Valley Council and the NRAR back in March 2019 expressing our concerns about the lack of oversight of the crossing of these two waterways, which are both significant flood-ways. We are unaware if the resident that constructed a roadway across the Central Tributary has complied by ensuring the roadway meets the relevant requirements for 3rd order stream crossings. Michael Saxon (South East BCD) informed the SSAG that this information

would be passed to the assessment team and the SSAG never received anything from the other email recipients. See below for the information previously sent.

Copy of email sent in March 2019

281128 Springdale Solar Farm OEH comments 2018Sep18_1657.pdf

Springdale Solar Farm DoI LW comments on EIS.pdf

1 and 2 for NSW DoI L_W.docx

DA180095 and DA180100 - Neighbour Letters - 76 Kiaora Lane.msg

- **Assessment Annexure D – BDAR Addendum Report & BCD Letter**

  - The BCD's letter of 18 June 2020 agreeing to a 15m screen planting vegetation offset will prevent impacts from shading. This is flawed as it doesn't allow for growth in the adjacent vegetation over 35 years.
  - The SSAG has previously raised with the DPIE about the how this proposed development fails to meet Commonwealth and state legislation, guidelines policies etc. Following is the information provided previously by the SSAG. Significant Impact Thresholds for GSM
  - **Aboriginal cultural heritage**
    The SSAG has previously asked questions about the timing of the sub-surface test excavation and we refer to DPIE's letter to the SSAG dated 20 August 2020 (see below), where it is stated, "*In May 2020, the new Applicant (RES Australia Pty Ltd) provided a letter to the Department that it proposed to undertake subsurface testing following determination and would accept a condition of consent to undertake subsurface testing prior to the finalisation of the detailed design of the project.*

    The Department accepted this approach and is completing its detailed assessment of the merits of the project and is examining all the issues raised during consultation by key agencies, Council, the local community and interest groups including those raised by the Sutton Solar Action Group."
    DPIE ltr to SSAG 20200820.pdf

  - If this matter was settled in May 2020, why does the letter from BCD to the DPIE dated 18 June 2020 still recommend that the sub-surface testing should be undertaken prior to project approval. The reasoning is to not only inform the design of the solar development, but also to address the concerns about the significant cultural values of the Springdale area raised by Ngunawal and Ngambri Elders following the assessment.