

Mr John Goodall
Program Leader – Building and Development
The Armidale Regional Council
PO Box 75A
Armidale
NSW 2350

Stringybark Solar Farm Pty. Ltd.
44 Quayle Street
Sandy Bay
TAS 7001

By Email

30th October 2019

Dear Mr Goodall,

**Re: Stringybark Solar Farm (DA-112-2019):
Response to consultation concerns raised in the submissions received by Council.**

I am writing on behalf of Stringybark Solar Farm Pty Ltd (the 'Proponent') in response to issues raised in submissions to the Armidale Regional Council regarding the community consultation process conducted to support the Development Application (DA) for the Stringybark Solar Farm (the 'Proposal').

While respectful of the views of respondents to the DA in relation to community consultation, it is important to note that some of the comments provided in submissions diverge from the Proponent's experience of the consultation process. As such, this letter has been compiled to clarify the consultation process conducted by the Proponent and address concerns raised in the submissions.

The letter is set out under the following headings:

1. Summary of consultation;
2. Consultation area;
3. Consultation timing; and
4. Conclusion.

1. Summary of consultation

The Statement of Environmental Effects (SSE, Section 6, pg 48 - 53) outlines steps taken to ensure the local community were informed about the Proposal and were given opportunities to ask questions or provide feedback that could be considered with respect to the design of the Proposal.

Consultation is summarised as follows:

- **Adjoining neighbour consultation** - All properties that adjoin the Site were notified directly about the Proposal through a range of avenues, including letters, emails and telephone calls.
- **Residential consultation in the local area** – To initiate consultation within the local community a letter was sent to all residents within 2km of the Development Envelope and

1km of the substation. Residents were invited to an Information session that was held in Armidale on the 22nd of May 2019. Note, the Proponent offered to organise an alternative meeting time for those individuals who could not attend the scheduled information evening. Any individuals beyond the consultation radius who contacted the Proponent were also included in the consultation process.

- **1st Information Session, 22nd of May 2019** - attendees were presented with a series of information boards about the Proposal and the project team were on hand to answer questions and listen to issues raised in relation to the Proposal (see Appendix D of SEE).
- **Residential assessment of potential landscape impacts** – to better understand visual concerns that local residents raised during the initial information session, the Proponent organised a landscape architect (as part of the Landscape and Visual Impact Assessment), to assess the potential visual impact of the Proposal from the homes of any of the attendees who provided their contact details and wished to participate.
- **Design modification** – the Proponent adopted a series of design changes to reduce the potential visual impact of the project in the local area:
 - A modification of the array area to reduce visibility;
 - The substation location was selected so that it could be screened from residential views;
 - All cabling associated with the Proposal would be installed underground to avoid the requirement for any new overhead power lines (except where the Substation connects to the Essential Energy 66kV line); and
 - The inclusion of strategically placed vegetation screens to minimise the extent of views where possible.

The modification of the Proposal demonstrates how the Proponent has responded in a measurable way to concerns raised by the community during the consultation process.

- **2nd Information Session, 25th of July 2019** - this session was held to demonstrate to local residents how the Proposal had been refined in response to concerns raised during the previous information session regarding the potential visual impact of the Proposal. The Landscape architect who conducted the Landscape and Visual Impact Assessment (Appendix E, SEE) attended the consultation session to present A-0 scale visualisations of the Proposal. This was to allow attendees to understand more fully how the refined Proposal would sit within the landscape. The visualisations were accompanied with commentary on how they were generated and how they should be interpreted. Two members of the development team were also on hand to discuss the updated plans and to answer any other project related questions. Note, a summary of the issues raised at the information sessions is provided in Table 6 -1 of the SEE (pg. 42).
- **Ongoing engagement** – A further meeting was held between a neighbouring resident and their representatives (Castle Doyle Action Group organiser and legal representation), and the Proponent and its environmental consultant in response to a detailed list of questions that were raised via email. A broad range of topics were discussed at the meeting. After the meeting there was an email request from the resident's legal representative for further contact details, these were provided but the Proponent has not received any further communication.

After the second information evening a pro-forma like email was received from a number of attendees thanking the Proponent for the information evening but highlighting that they did not feel that all their concerns had been addressed. There was also a request to be notified when the DA had been submitted to the Council. As no details were provided regarding the nature of the outstanding concerns the Proponent responded to the emails requesting further information. No responses were received. The Proponent notified the individuals

who requested to be informed that the DA had been formally accepted by the Armidale Regional Council on the 27th of August (note: the Proponent missed responding to two emails; both individuals were contacted once the omission was realised).

Telephone calls have been made to local residents and interested parties, and numerous emails have been written to the local community as part ongoing consultation activities.

- **Local Government Consultation** – Armidale Regional Council was formally briefed about the Proposal on two separate occasions (3rd of April, 2019 as well as 17th of July 2019).
- **State Government Consultation** – A meeting was held with the Member for Tablelands on the 21st May 2019. The Member was briefed on the location and nature of the Proposal.

2. Consultation Area

Submissions from some community members have indicated that they think the area used for local consultation did not reflect the potential for offsite impacts in the surrounding area. As stated in the SEE (p.g, 40), the *'consultation radius [area] reflects the distance at which a solar farm of the nature and scale proposed has the potential to have effects on local amenity (note, the environmental studies that are included in this SEE support this assumption)'*. This includes potential effects with respect to visual impacts which diminish with distance. The LVIA states that given the scale and type of proposal, visual change beyond 2km would be *'potentially noticeable, but will not dominate the landscape'* (LVIA report, pg 22) and as such, visual impacts beyond 2km are assessed as low to negligible.

It should be noted, that consultation is a dynamic process which changes over time. This is reflected in the number of individuals outside the initial 2km consultation radius that participated in the consultation process. This was welcomed by the Proponent.

3. Timing of Consultation activities

Concern has been raised that the Proponent notified the community late in the project development cycle, in order that the community would not have time to consider project information or object to the Proposal if they wished. This is clearly not the case as is demonstrated by the time line presented in the summary of the consultation process described in Section 1 of this letter. There were two months between information sessions, and a further month before the DA was submitted. Further, individuals who requested to be alerted when the DA was submitted to Council were notified by the Proponent via email.

The development application has also gone through the Council's own notification process which included advertising the application, providing a hard copy of the DA and the accompanying SEE for viewing at the Council offices and access to the application via the Council's website.

4. Conclusion

In conclusion, it is clear that the Proponent has implemented a considered consultation process to inform relevant stakeholders about the proposed Stringybark Solar Farm.

Yours sincerely,

A handwritten signature in black ink that reads "Jane Ross". The signature is written in a cursive, flowing style.

Jane Ross

Project Director for Stringybark Solar Farm