Altomonte (Nominees)

16 November 2020

The Secretary Department of Planning, Industry and Environment 320 Pitt Street SYDNEY NSW 2000

Dear Secretary

PROPOSED DUNEDOO SOLAR FARM - SSD 8447

I am writing to object the proposal to construct a solar "farm" on prime agricultural land opposite the Dunedoo township being proposed by *i b vogt GmbH* on behalf of Sun Spot 4 Pty Ltd.

At the outset I would note that the word "farm" is a complete misnomer. What is being proposed is a full scale industrial complex, not a rural industry which may be permissible under the Warrumbungle DCP. There is no provision under the DCP for an approval of an industrial development of this scale on rural land.

My major concern is the visual impact the plant will have on the Dunedoo township and neighbouring rural residences which overlook the site. The objectives in the DCP clearly recognise that the maintenance of a rural outlook is an important part of the amenity of the district. The site proposed for the solar installation is approximately 112 hectares, all of which is in full view of the Dunedoo township and surrounding residences. If approved, an installation of this size would have a massive impact on the visual amenity of all residents in the Dunedoo township and surrounds and would dominate views of the countryside, destroying the rural outlook.

When looking at the objectives for rural development controls in the DCP, any proposed development should do the following:

- Protect the amenity of the locality
 - Ensure the development complements the natural characteristics of the area;
 - Achieve design that complements the landscape and does not cause adverse visual impact;
 - Ensure the development does not adversely impact on the existing and future agricultural and rural industry potential of the land, and
 - Minimise possible impacts on threatened species or their habitat.

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In my view, the proposal fails to meet all of these objectives. The location of the proposed solar installation is on prime agricultural land, on the river flats adjoining the Talbragar River, and is overlooked by the Dunedoo township. It is the location of the proposed plant opposite Dunedoo that is the concern and it should be moved.

The principle of preserving prime agricultural land for agricultural purposes has been fully aired in the recent coal seam gas debate, where it was clearly established. That principle applies equally to the current proposal, and in fact is even more applicable than the coal seam gas example, because the solar plant is able to be relocated to other sites. If it were relocated to the north western side of the ridge just behind the proposed site it would be out of sight of the township and this concern would be alleviated.

Another impact of the proposed installation will be from reflection and glare from the solar panels. Drivers travelling east along the Mendooran Road towards Dunedoo will be driving straight towards the installation for the last several kilometres of their trip. As the panels will be tracking the sun in the afternoon when the sun is in the west, the reflection from the panels will be towards drivers travelling this route, and is therefore a potential safety hazard for road users.

In addition, our company Altomonte (Nominees) Pty Ltd owns the farming aggregation "Corumbene", which adjoins the proposed solar farm site, and where there are a number of homes which overlook the proposed solar installation. Reflections from the panels will also disturb and annoy the occupants of those dwellings.

I note the Visual Impact Assessment lodged with the application rates the overall visual impact of the project as low, taking into account mitigating factors such as proposed plantings and existing buildings in the Dunedoo township. None of the viewpoints that were included were from private property, so this assessment is not comprehensive and no proper analysis of the impact on affected residences has been included. I would add that the fact that mitigation measures are necessary supports my principle objection, that the proposed development is in the wrong location. This has not been addressed at all in the application

For all of these reasons, which are also why I declined the opportunity to have this plant situated on our Corumbene property, the proposal to situate a major solar installation in the proposed location should not be approved. The proposal is contrary to the proper planning and sustainable development of this area and is inconsistent with the objectives of the Warrumbungle DCP and the interests of residents.

Yours faithfully

George Altomonte Chairman Alto Group