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 29 November 2020

Mr Jim Betts

Secretary,

Planning, Industry & Environment

GPO Box 39

SYDNEY NSW 2001

**Re: Objection to proposed Jindera Solar Farm (SSD – 9549)**

Dear Mr Betts,

Thank you for the opportunity to comment on the Environmental Impact Statement (EIS) prepared by ngh environmental on behalf of Jindera Solar Farm Pty Ltd dated September 2019.

I am writing to object to the proposal as my 40 hectare farming property shares the boundary with one of the properties where the proposed 521 hectare solar farm will be situated.

I declare that I have not made a donation to any political party in the past five (5) years.

My four primary objections to the establishment of the proposed solar farm are:

1. **Visual impact and amenity** – I am 87 years of age and the proposed solar farm is clearly visible from my home. Currently I look out at quiet open paddocks with cattle grazing. Despite ongoing consultation with the proponent (Green Switch Australia) we have not been able to agree on a suitable form of screening that will adequately mitigate views of the 3 metre high solar arrays. During the consultation I requested that any tree screening along my boundary be a minimum of 4 metres in height to both hide the solar arrays and associated security fence. I now find that they are proposing to plant small trees and install shade cloth on the full length of the security fence[[1]](#footnote-1). I do not consider this to be in any way a show of “good faith” negotiation. Synthetic shade cloth also presents a genuine risk of fuelling a grass fire during a fire event. Undoubtedly the unsightly cloth (which is incongruous with the farm landscape) would need to remain in place for many years until the trees were tall enough to screen the infrastructure. This unsightly material would undoubtedly put downward pressure on property values.

1. **Devaluation of property values** – My farm has been my home for the past 30 years. It has recently been valued at between $850,000 and 1.1M. This valuation is based on the highly sought after 40 hectare property size in addition to the infrastructure (Brick veneer home, shedding & cattle yards) combined with pasture improvement and a strong fertilizer history which has been undertaken on the prime agricultural land throughout the 30 year period. Unfortunately, the Valuer was not able to provide a price post construction of a solar farm but expects that a significant devaluation would occur at Auction. To this end, I would be interested in understanding whether affected landholders will be compensated should a solar farm be constructed and property values be significantly affected. A precedence for compensation has already been set with the NSW Governments’ compensation package for the taxi and hire car to accommodate “Ride-Share” (Uber).
2. **Fragmentation/Loss of Prime Agricultural Land** – From the outset, I am not opposed to renewable electricity but am genuinely concerned with the loss of Prime Agricultural Land which will inhibit Australia’s ability to not only feed its increasing population but also export to the world. The proponent (Green Switch Australia) claims *that the proposal is not located on Strategic Agricultural Land. However; it is partially located on Class 3 Agricultural Land[[2]](#footnote-2).* They later acknowledge that this categorisation is based on outdated and repealed legislation. Further in the document[[3]](#footnote-3), the proponent correctly identifies that *Land that is considered State Significant Agricultural Land is listed in Schedule 1 of the Primary Production SEP which is currently incomplete/blank with mapping yet to be complete or publicly available.*

While the SEP is yet to be completed or gazetted, I know from personal experience that the nearby land on which the proponent wishes to establish a solar farm is highly productive and like others in the area has significantly benefitted from rotational cropping, pasture improvement and fertiliser inputs. The area has a reliable rainfall (compared to most) and properties are highly sought after given their ability to produce:

* prime sheep and cattle;
* high value oil seed and cereal crops;
* certified seed production; and
* hay and silage fodder which is exported throughout Australia to assist in maintaining a dairy industry and feeding stock in time of drought.

In addition to the above, it would appear mischievous to infer that the proposed solar farm will continue to be used for agriculture including strategic grazing[[4]](#footnote-4). Dust is the bane of solar panels given it significantly reduces their ability to produce maximum electricity. Any stock movement within close proximity (or underneath) panels will create dust that not only reduces panel efficiency but will also require additional panel cleaning from a scarce water resource. Accordingly, the proponents may wish to reassess the amount of water that they estimate will be needed for panel cleaning should they attempt to run sheep within a solar farm.

 We are already losing prime agricultural land on the fringes of cities and can do without further loss in rural NSW. One could ask, why can’t we place floating solar farms on large water catchments/dams similar to that which successfully operates in Europe rather than lose further highly productive land in the Jindera area.

1. **Increased heat carried by prevailing wind** – My home is downstream and in close proximity to the proposed solar farm. I am concerned about the potential heat that will be generated and carried in my direction by the prevailing wind. In 2018 we suffered a number of days in excess of 40 degrees Celsius which was not only demanding for my stock but challenging for myself. Despite the proponents claim that studies into *Heat Island Effect* show negligible temperature increases I remain unconvinced that the temperature will not increase through direct heat radiation. I would suggest that the jury remains out on this issue and it will be too late to complain should the solar farm be established and my fears be subsequently realised.

In closing, thank you for the opportunity to comment on the EIS and I would implore both you and the Minister to not approve the application given it will:

* visually impact on neighbouring residential amenity;
* result in a devaluation of property values;
* fragment and remove significant areas of highly productive farmland; and
* potentially increase mid-summer temperatures for neighbouring properties downstream of the solar arrays.

Please don’t hesitate to contact me on 0400949884 or nduncan15@bigpond.com should you have questions in relation to this matter.

Yours sincerely,

SN Duncan

1. Page 145 Results & Visual Concerns dot point 1. [↑](#footnote-ref-1)
2. Executive Summary Page xviii Project Benefit Dot Point 4 [↑](#footnote-ref-2)
3. 4.2.9 State Environmental Planning Policy (Primary Production & Rural Development) 2019, Page 52 Paragraph 2 [↑](#footnote-ref-3)
4. Page 62, Table 4-5 Directions, actions and consideration of the NSW Riverina Murray Regional Plan 2036 – EIS Considerations Para 4 and 5 [↑](#footnote-ref-4)