



**NAME REDACTED**

**OBJECT**

Submission No: 189524

Organisation:		Key issues: <i>Land use compatibility, Visual impacts, Hazards and risks</i>
Location:	<i>Australian Capital Territory 2615</i>	
Submitter Type:	<i>an individual making a submission on my own behalf</i>	
Attachment:	<i>Wallaroo Solar Farm Objection Submission.pdf</i>	

Submission date: 7/31/2024 10:09:53 AM

*Objection to Wallaroo Solar Farm (WSF) at 246-248 Southwell Road, Wallaroo NSW*

*I write to voice my objection to the proposed development of Wallaroo Solar Farm (WSF) at 246-248 Southwell Road, Wallaroo NSW.*

*As a nearby ACT resident of [REDACTED], Fraser, within 4km and with direct, elevated line of site to a substantial portion of this proposed development, I cannot identify any reference within the WSF Assessment Report of relevant consideration against the assessment criteria for visual impact, scenic quality and viewpoint sensitivity required under the NSW Department of Planning and Environment Technical Supplement - Landscape and Visual Impact Assessment Large-Scale Solar Energy Guideline.*

*Substantial and numerous objections have been put forward with similar concerns and many have articulated valid worries regarding water and environmental hazards and fire related risks of such an industrial facility, with a 1,645,450 square metres (165.45 hectares) amended development footprint in bushfire prone area, and in such close proximity to tens of thousands of residents.*

*This solar factory does not belong in this location.*

*Alternatively, efforts to minimise local environmental impacts and simultaneously achieve positive environmental gains alternatives for this development could include the planting of trees and other activities associated with Carbon Farming and collection/selling of Carbon Credits via the Australian Carbon Credit Unit Scheme, for example.*

*1,645,450 square metres of treescape, foliage and canopy would be a more appropriate use of the land in this rural RU1 zoned location, buttressed by so many established families, rather than imposing fields of metal, glass and concrete on tens of thousands of local residents for an entire generation (30 years).*

*The attached document, "Fraser Resident Objection to Wallaroo Solar Farm" attempts to highlight some of the key concerns and considerations for which I believe this proposed development should be rejected.*

*I implore the Independent Planning Commission to consider these concerns, and the scores already articulated in existing objections/submissions, for a 1,645,450 square metre industrial facility located under a kilometre from thousands of established families/residences, and for which, surely, the proponents of this project would similarly object were it proposed so close to their personal homes.*

*Sincerely,*

[REDACTED]

## **Objection to Wallaroo Solar Farm (WSF) at 246-248 Southwell Road, Wallaroo NSW**

I write to voice my objection to the proposed development of Wallaroo Solar Farm (WSF) at 246-248 Southwell Road, Wallaroo NSW.

As a nearby ACT resident of Bingley Crescent, Fraser, within 4km and with direct, elevated line of site to a substantial portion of this proposed development, I cannot identify any reference within the WSF Assessment Report of relevant consideration against the assessment criteria for visual impact, scenic quality and viewpoint sensitivity required under the NSW Department of Planning and Environment *Technical Supplement - Landscape and Visual Impact Assessment Large-Scale Solar Energy Guideline*.

Absent such formal assessment, the following images and Artist Impressions demonstrate the Visual Sensitivity, Scenic Quality and Visual Impact which we believe should form part of the Department's consideration.

*Primary View from Residence (current)*



*Visual Impact - Glare - Artist's Impression*



Substantial and numerous objections have been put forward with similar concerns and many have articulated valid worries regarding water and environmental hazards and fire related risks of such an industrial facility, with a 1,645,450 square metres (165.45 hectares) amended development footprint in bushfire prone area, and in such close proximity to tens of thousands of residents.

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Sincerely,

Glen Krummel

# Considerations for NSW Government Independent Planning Commission

## Objection to Wallaroo Solar Farm (WSF) at 246-248 Southwell Road, Wallaroo NSW

31<sup>st</sup> July 2024

### References:

#### Wallaroo Solar Farm (nsw.gov.au)

<https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=SSD-9261283%2120240627T075700.491%20GMT>

#### Large-Scale Solar Energy Guideline 2022

[https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub\\_pdf/Lisa+Drupal+Documents/16007\\_DPIE+Large+Scale+Solar+Energy+Guidelines\\_26-9-22.pdf](https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub_pdf/Lisa+Drupal+Documents/16007_DPIE+Large+Scale+Solar+Energy+Guidelines_26-9-22.pdf)

#### Technical Supplement - Landscape and Visual Impact Assessment Large-Scale Solar Energy Guideline

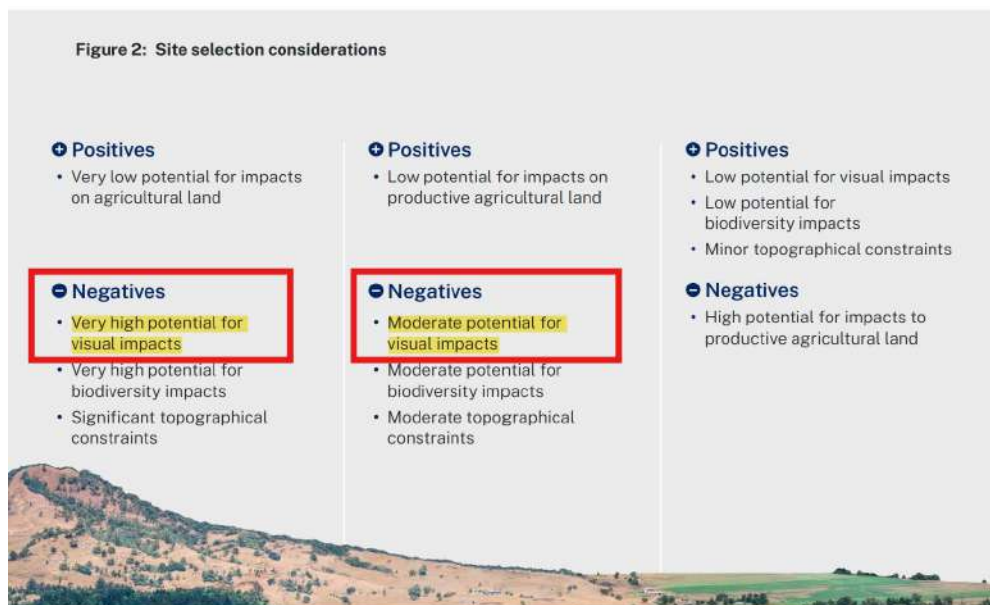
[https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub\\_pdf/Keelie+Drupal+Documents/GD2043\\_DPE+Visual+Impact+Assessment+Framework\\_28\\_09\\_22.pdf](https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub_pdf/Keelie+Drupal+Documents/GD2043_DPE+Visual+Impact+Assessment+Framework_28_09_22.pdf)

### Visual Impact

Per Item 74. of the **Wallaroo Solar Farm (SSD-9261283) Assessment Report:**

“The Department has assessed the proposed development against the provisions of the *Large-Scale Solar Energy Guideline (2022) and accompanying Technical Supplement - Landscape and Visual Impact Assessment...*”

[Large-Scale Solar Energy Guideline Excerpt \(pg 20\)](#)



**Section 5.3.3 Assessment**, detail the Department’s findings and are included below for convenience, accompanied by our feedback and supporting considerations articulating why these findings should be reconsidered.

KEY:

**Black Text:**

- The Department of Planning, Housing and Infrastructure **Wallaroo Solar Farm** State Significant Development Assessment Report (SSD-9261283) June 2024

**Blue Text:**

- Fraser Resident Feedback for Consideration

83. The Department has assessed the potential visual impacts of the project on the surrounding landscape character, residential receivers and public viewpoints and considers these impacts would be low. Further details of the Department's assessment are discussed in the following sections.

- *\*Wallaroo Solar Farm (SSD-9261283) Assessment Report | pg26*
- We believe insufficient consideration has been given to potential visual impacts of the project on **“surrounding landscape character, residential receivers...”** and that **these impacts would high or moderate** at the very least and certainly not low as considered.
- Per **Section 3.1.1 Preliminary Assessment Tools** of *The Technical Supplement – Landscape and Visual Impact Assessment* guidelines it appears no assessment has been undertaken considering visual impacts on residences in Bingley Crescent, Fraser ACT, including mine...:

a) within 4km of the proposed development;

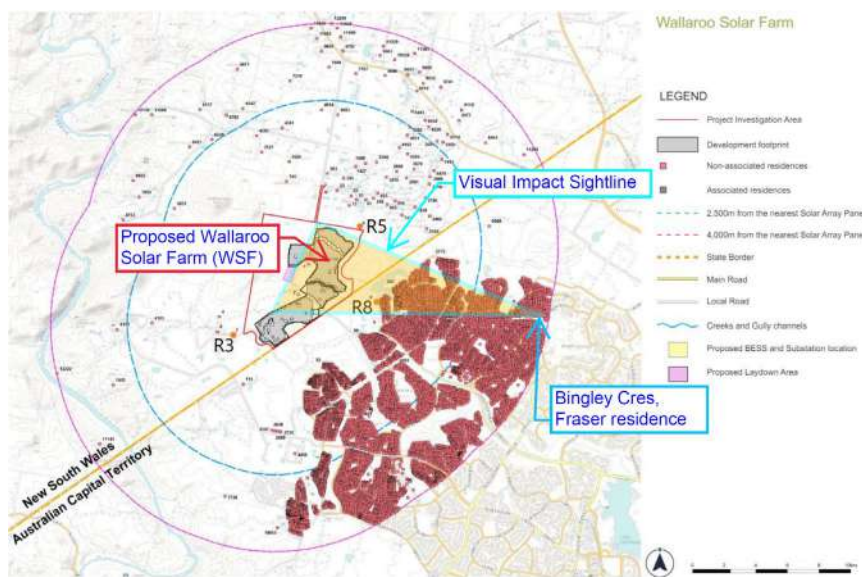




Figure 5 | Nearby non-associated residences



b) =>100m relative height difference between the proposed development and each viewpoint;

<p>Interactive map</p> <p>Click on the map to display elevation.</p>  <p>300 m 1000 ft</p> <p>TessaDEM   Elevation API   OpenStreetMap</p>	<p>Interactive map</p> <p>Click on the map to display elevation.</p>  <p>100 m 500 ft</p> <p>TessaDEM   Elevation API   OpenStreetMap</p>
<p>Proposed Wallaroo Solar Farm 550m   <a href="https://en-au.topographic-map.com/map-znpb3/Canberra/?center=-35.18765%2C149.00452&amp;zoom=15&amp;popup=-35.18698%2C149.00547">https://en-au.topographic-map.com/map-znpb3/Canberra/?center=-35.18765%2C149.00452&amp;zoom=15&amp;popup=-35.18698%2C149.00547</a></p>	<p>Bingley Crescent, Fraser ACT 655m   <a href="https://en-au.topographic-map.com/map-znpb3/Canberra/?center=-35.19342%2C149.04591&amp;zoom=16&amp;popup=-35.1939%2C149.04842">https://en-au.topographic-map.com/map-znpb3/Canberra/?center=-35.19342%2C149.04591&amp;zoom=16&amp;popup=-35.1939%2C149.04842</a></p>

- This viewpoint appears not to have been considered in the WSF assessment while clearly falling within the scope of the pertinent guidelines.

84. The Department considers site selection and project design is consistent with the Department's *Large-Scale Solar Energy Guideline*, particularly in avoiding sites with high visibility such as those on prominent or high ground positions.

- *\*Wallaroo Solar Farm (SSD-9261283) Assessment Report I pg26*

While residences such as mine in Bingley Crescent are sited within the 4km project range and subject to consideration, the Department's consideration of site selection does not appear to address key criteria of the *Technical Supplement - Landscape and Visual Impact Assessment*, including:

- Stage 3 - Visual sensitivity – “**Visual sensitivity refers to the quality of the existing view and how sensitive the view is to the proposed change...**”
- Step 1 - Viewpoint sensitivity – “**Viewpoint sensitivity relates to the relative importance of viewpoints and the value that the community or visitors may place on landscapes viewed from public use areas, public travel ways and private viewpoints such as dwellings.**”
- Step 2 – Scenic quality – “**Scenic quality refers to the relative scenic, cultural or aesthetic value of the landscape** within the viewshed based on the presence or absence of key landscape features known to be associated with community perceptions of low, moderate, or high scenic quality
- Step 3 – Visual sensitivity - Once the viewpoint sensitivity and scenic quality are determined, these can be combined using the visual sensitivity matrix in Table 8 to determine the overall visual sensitivity of each assessable viewpoint.  
*and*
- Stage 4 – Visual impact – “The overall visual impact rating of each viewpoint must be determined for each assessable viewpoint by combining the visual magnitude and visual sensitivity using the matrix in Table 9”

The following images and Artist Impressions demonstrate the Visual Sensitivity, Scenic Quality and Visual Impact which we believe should form part of the Department's consideration.

**Note:** Artist Impressions

The following Artist Impressions have been created considering a possible best case result, to avoid a perception of bias but to give weight to just how heavy and impactful on the landscape and local environment would be a solar factory of the proposed scale in this proposed location.

There is every likelihood that the final construction of this Wallaroo Solar Factory may have materially greater negative impact on the landscape and local resident's amenity.

## Visual Impacts

*Primary View from Residence (current)*



*Proposed Visual Impact - Artist's Impression*





Glint/Glare

*Visual Impact - Moderate Glare - Artist's Impression*



*Visual Impact - Minor Glare - Artist's Impression*



Landscape

85. Public submissions highlight that the rural landscape is valued by the community for its scenic character.
- *\*Wallaroo Solar Farm (SSD-9261283) Assessment Report I pg26*
  - **Agree.**
86. The Department notes that the site topography and existing and proposed vegetation screening, would minimise views of the project from the surrounding area. Impacts on the local landscape have also been reduced through project design, including a reduction in the solar array extent.
- *\*Wallaroo Solar Farm (SSD-9261283) Assessment Report I pg26*
  - **Disagree.** The proposed **vegetation screening will not minimise views of the project from the surrounding area where residents reside in at higher elevations as identified earlier.**
87. The Department recognises that the introduction of the proposed solar farm to a rural area would result in a change to the local landscape, but considers the development would have a limited impact beyond the project's immediate vicinity. Accordingly, the Department considers the project would have a limited impact on the broader landscape character of the region as a whole.
- *Wallaroo Solar Farm (SSD-9261283) Assessment Report I pg26*
  - **Disagree.** *The Department acknowledges that there are a large number of residences located in proximity to the site (Item 88.). In the ACT alone, and using the 4km radius specific in the Preliminary Assessment Tool of the Technical Supplement - Landscape and Visual Impact Assessment guide, as being within the “project’s immediate vicinity”, 14,314 residents in the suburbs of Dunlop and Macgregor, and in the manner in which these suburbs are designed for communities to coalesce and share amenities as many as a further 22,282 residents of neighbouring suburbs may be affected by changes to amenity of the local landscape.*

## Residences

88. The Department acknowledges that there are a large number of residences located in proximity to the site. For this reason, consideration of the visual impacts of the project on the amenity and character of the area has been a focus for the Department,
- *\*Wallaroo Solar Farm (SSD-9261283) Assessment Report I pg26*

**For Consideration**

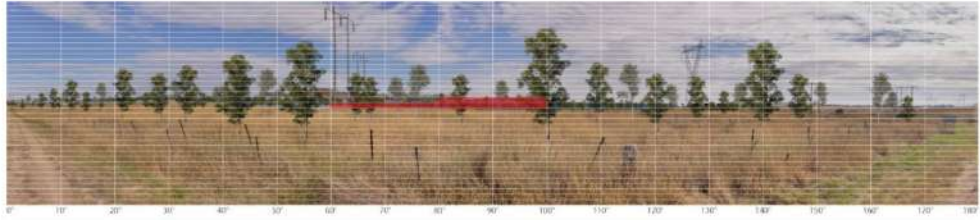
Suburb	# People	Source
Dunlop	7,265	<a href="https://abs.gov.au/census/find-census-data/quickstats/2021/SAL80049">https://abs.gov.au/census/find-census-data/quickstats/2021/SAL80049</a>
Macgregor	7,049	<a href="https://abs.gov.au/census/find-census-data/quickstats/2021/SAL80089">https://abs.gov.au/census/find-census-data/quickstats/2021/SAL80089</a>
Charnwood	3,055	<a href="https://abs.gov.au/census/find-census-data/quickstats/2021/SAL80035">https://abs.gov.au/census/find-census-data/quickstats/2021/SAL80035</a>
Fraser	2,126	<a href="https://abs.gov.au/census/find-census-data/quickstats/2021/801011010">https://abs.gov.au/census/find-census-data/quickstats/2021/801011010</a>
Flynn	3,671	<a href="https://abs.gov.au/census/find-census-data/quickstats/2021/801011009">https://abs.gov.au/census/find-census-data/quickstats/2021/801011009</a>
Holt	5,628	<a href="https://abs.gov.au/census/find-census-data/quickstats/2021/SAL80075">https://abs.gov.au/census/find-census-data/quickstats/2021/SAL80075</a>
Latham	3,767	<a href="https://abs.gov.au/census/find-census-data/quickstats/2021/SAL80084">https://abs.gov.au/census/find-census-data/quickstats/2021/SAL80084</a>
Higgins	3,321	<a href="https://abs.gov.au/census/find-census-data/quickstats/2021/SAL80073">https://abs.gov.au/census/find-census-data/quickstats/2021/SAL80073</a>
Strathnairn	714	<a href="https://abs.gov.au/census/find-census-data/quickstats/2021/SAL80120">https://abs.gov.au/census/find-census-data/quickstats/2021/SAL80120</a>
<b>Total</b>	<b>36,596</b>	

89. The nature of the proposed development would serve to minimise its visibility from surrounding residences as the solar panels would be relatively low lying (up to 4.73 m high), the BESS 2.6m high, power conversion units 2.9m high, and substation.

- *\*Wallaroo Solar Farm (SSD-9261283) Assessment Report I pg26*
- **Note that WSF proposed Vegetation Screening indicates potential growth progress at 5 years, not prior to construction or before commissioning.** Residents will be affected over many years while vegetation grows, and no amount of vegetation screening will minimise the visual impact to residents in neighbouring, elevated suburbs.







90. Given the high density of dwellings in the ACT, views of the project for the majority of these residences would be blocked by surrounding urban structures.
- *\*Walleroo Solar Farm (SSD-9261283) Assessment Report | pg26*
  - **The manner in which these suburbs are designed for communities to coalesce and share amenities may be affected by changes to amenity of the local landscape.**
91. 21 residential receptors were selected for detailed assessment, including five receptor locations representative of views from residential clusters within the ACT. Of the 21 receptors, four were identified as requiring photomontages for further detailed assessment of visual impacts.
- *\*Walleroo Solar Farm (SSD-9261283) Assessment Report | pg26*
  - **It appears no residential receptors were selected from affected, residential clusters in neighbouring elevated suburbs/locations. Eg Fraser ACT**
92. Photomontages identified that one receptor representing the viewpoints of approximately 23 dwellings along James Harrison Street, would be exposed to a moderate visual impact pre-mitigation. Post-mitigation, this was reduced to a low visual impact (refer to **Figure 7**). The remaining receptors were assessed as having low or very low visual impact pre-mitigation.
- *Walleroo Solar Farm (SSD-9261283) Assessment Report | pg26*
  - **It appears no Photomontages were undertaken representing viewpoints from affected, residential clusters in neighbouring elevated suburbs/locations. Eg Fraser ACT**
93. A summary of the visual impact assessment for each of the 21 residential receptor locations is provided in **Table 7**.
- *Walleroo Solar Farm (SSD-9261283) Assessment Report | pg26*
  - **This visual impact assessment excludes affected, residential clusters in neighbouring elevated suburbs/locations. Eg Fraser ACT**
94. ***The Department considers that both the direct and cumulative visual impacts on all potentially affected residences would be low, very low or nil***, due to the separation



distance, the undulating topography of land surrounding the site, the high density of dwellings blocking views within residential areas and intervening existing and proposed vegetation, which is consistent with the requirements of the *Large-Scale Solar Energy Guideline (2022)* and accompanying *Technical Supplement - Landscape and Visual Impact Assessment*.

- *\*Wallaroo Solar Farm (SSD-9261283) Assessment Report I pg27*
- **Disagree. As noted prior, affected residents in neighbouring, elevated locations will suffer high visual impacts, loss of scenic quality and negative visual sensitivity.**

95. The Department has assessed the potential cumulative visual impacts from further renewables projects in the region. With the closest renewables project being Springdale Solar Farm, approximately 17km north-east of the WSF site, there would be no cumulative visual impacts due to distance, topography and intervening vegetation.

- *\*Wallaroo Solar Farm (SSD-9261283) Assessment Report I pg27*
- **No Response**