

**From:** [noreply@feedback\\_planningportal.nsw.gov.au](mailto:noreply@feedback_planningportal.nsw.gov.au) on behalf of [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE PS ePlanning Mailbox](#)  
**Subject:** Webform submission from: Activation Precincts SEPP and the Wagga Wagga master plan  
**Date:** Saturday, 26 September 2020 7:11:20 AM

---

Submitted on Sat, 26/09/2020 - 06:58

Submitted by: Anonymous

Submitted values are:

Submission Type: I am making a personal submission

First Name: Cheryl

Last Name: Cartwright

Name Withheld: No

Email: [REDACTED]

Suburb/Town & Postcode: Brucedale 2650

Submission file: [webform\_submission:values:submission\_file]

Submission: My concerns and questions about the Wagga Wagga Special Activation Precinct (SAP) draft master plan, the accompanying Discussion Paper (Explanation of Intended Effect) that proposes the addition of the Wagga Wagga SAP to the State Environmental Planning Policy (Activation Precincts) 2020 and the technical studies and community engagement that informed the evidence base for the Wagga Wagga draft Master Plan are outlined below. The results of the technical studies and community engagement are said to have informed the evidence base for the Wagga Wagga draft Master Plan. Therefore I expected that the COMMUNITY AND SOCIAL INFRASTRUCTURE ASSESSMENT would have included a detailed assessment, including the cultural heritage, values and social infrastructure of those communities that lie within the SAP Plan or adjoin it. I was shocked to find that wasn't the case. It is not reasonable that the COMMUNITY AND SOCIAL INFRASTRUCTURE ASSESSMENT does not include any detailed reference to current Brucedale residents and their considerations or concerns or the rich heritage of the Brucedale village and surrounding rural community. I note in its references that no mention is made of the 'History of the Brucedale District' compiled by the Brucedale History Committee in 1998 which is an excellent source of background information about not only Brucedale, but the Special Activation project area itself. I have a spare copy that I can loan to your review team. It is also not reasonable that there is only limited discussion in the COMMUNITY AND SOCIAL INFRASTRUCTURE ASSESSMENT dedicated to the consideration of Indigenous interests or concerns of Indigenous representatives beyond acknowledgement that the Special Activation Project is on Wiradjuri country, a brief note on historical Indigenous context and some generic wording (lifted from WWCC Community Strategic Plan 2040, 2016 and Riverina Murray Regional Plan, 2017) around commitment to showcasing the cultural heritage of the Wiradjuri people, working in partnership to provide opportunities for Aboriginal people, bridging the gap between non-Aboriginal and Aboriginal employment rates, enhancing the economic self-determination of Aboriginal communities, increasing the Aboriginal community's capacity, providing choice, and empowering Aboriginal people to exercise their choice along with the tools to take responsibility for their own future. In addition, it is noted that there is opportunity to review the landholdings of Local Aboriginal Councils to benefit the local community which 'would allow Aboriginal people to gain economic benefit from their land and provide opportunities for independence'. Yet the Bomen Axe quarry, now an Aboriginal landholding, is noted to be at risk with all scenarios that underwent SWOT analysis. If Wagga Wagga City Council documents informed the evidence base for the Wagga Wagga draft Master Plan the following five strategic directions for Wagga Wagga which were identified by Wagga Wagga City Council following engagement with the community should be followed: — community leadership and collaboration — safety and health — growing economy — our identity and sense of place — our environment. It is also said that one of the four aspirations for the precinct in the realm of communities and place is to Work with local communities, including Wiradjuri people and local residents to create a strong connection to place. I can't see much evidence of this happening so far when there is little recognition that we even exist. Brucedale and the SAP lie within Wagga Wagga City Council boundaries so the identity and sense of place of this area should be considered within this broader strategic direction. The railway buildings, Hopevale, Brucedale school, Brucedale church, Pine Ridge Cottage, the old PO, the 2WG transmission building and the Hall and tennis courts are all listed as Heritage 'items' to be protected but they are not just a list of disconnected old buildings. These old surviving structures provide visual connection to the history of this area, its rural identity and the important role that it played as a main transport route for both Indigenous and non-Indigenous people. There are other old buildings within the SAP area that haven't been identified but should also be acknowledged, highlighted and protected. The house and workshop on my property was built by the Shephards, one of the original families who settled in the Brucedale district in 1872 and owned by Rebecca Shephard until she died in 1938, as well as the woolshed on the property just over Mary Gilmore Road from my house. I am happy to provide further details to your review team. Surely it also has heritage value that Dame Mary Gilmore, nee Cameron, widely recognised as one of Australia's most famous writers and poets, was a student at the original Brucedale school and for whom Mary Gilmore Road was named. Her family objected to the poor treatment of local Aboriginal people and had a friendly relationship with local Indigenous families which was uncommon at the time. Yet the inclusion of Mary Gilmore Road as the northern boundary of the Special Activation Precinct in the study and SAP area and the subsequent impacts on the landscape, the natural environment and the residents of Mary Gilmore Road is hardly mentioned. If it is intended to 'develop a policy that encourages companies at the SAP to engage with the local community because International experience shows that engagement of companies in community activities can lead to significant positive contributions and can strengthen the trust and relationships between industries and local communities' does this include the existing local community that seems to be forgotten? And if so, how? Now referring to the Wagga Wagga Special Activation Precinct A.4.1a Structure Plan prepared for Department of Planning, Industry and Environment .... There appears to be limited consideration of the impacts likely to be felt by the residents of Mary Gilmore Road, particularly those living along the eastern half of Mary Gilmore Road. My house is situated 25 m from the northern edge of Mary Gilmore Road. I note that the map of the Wagga Wagga Special Activation Precinct Structure Plan shows the Rural Activity Zone to be a relatively narrow strip that adjoins the section of Mary Gilmore Road I refer to above, compared to other areas of Rural Activity Zone. When I look at the 'Illustrative master plan' of Regional Enterprise Sub-Precinct showing how the Precinct could look at full development (page 69) the likely impacts of this on the residents of Mary Gilmore Road is not acceptable. We are already impacted by the visual glare of the solar farm that has been established over the Southern railway line, the odour and eyesore of the current industries at Bomen, let alone the impact of even more intensive development so much closer to us. Also, as the most easterly resident of Mary Gilmore Road, my house is situated 200m from the main Southern railway line and not much further from Byrnes Road, running parallel and in close proximity to the railway line. The noise levels from both trains and road traffic, particularly heavy vehicles, already keeps me awake regularly through the night. The likelihood that this will increase (confirmed by Alex who presented the modelling of noise impacts undertaken for the SAP) as the SAP develops is not acceptable, particularly when the noise modelling for the SAP did not take into account any rail noise. I note that there is no significant east/west green corridor to act as a buffer to protect my property marked on the 'Illustrative master plan' of Regional Enterprise Sub-Precinct showing how the Precinct could look at full development (page 69) and instead it appears that I will be exposed to the additional noise impact of the expanded Freight and Logistics hub and associated siding that is proposed almost at my door. This, combined with the likely noise and vibration impact of the development of the Inland Rail Project, is also not acceptable and mitigation measures must be investigated to help reduce this impact, particularly if the expanded hub plans go ahead. If double glazed windows would help mitigate the impacts consideration should be given to providing me with financial support to install these. I cannot afford and shouldn't have to replace all the windows in my old house myself when the benefits of the expanded Freight and Logistics hub, the Inland Rail Project and the SAP are not mine. Was there modelling work done on the impacts of this for me? Was there any consideration of the cumulative noise impacts at my property which will be impacted by the combination of Byrnes Road traffic noise, the main Southern railway line, the Inland Rail Project, the RiFL hub and the SAP? The complexity of all of these likely impacts is very difficult to unravel for me and to model for you I assume ... and my property is in quite a unique locality compared with other Brucedale residents but this doesn't mean those impacts should be ignored or mitigation measures not investigated or put in place. I have been told that approval for the RiFL project did not require a formal community consultation period and neither will the Inland Rail Project so this seems to be the only opportunity I will have to raise my concerns.

Much more needs to be planned to protect the residents, their properties and the ecological habitat of Mary Gilmore Road. It is noted that The Northern Growth Area Structure Plan covering a large area to the north of Wagga Wagga, directly adjoins the SAP investigation area boundary to the west. Even though the details of the structure plan are not known yet, it is claimed that the investigations for it and the execution of it will impact on the future plans for the SAP. Yet the existing residents of Mary Gilmore Road, including my family who have been settled here for over 70 years, don't seem to have any voice or influence over the future plans for the SAP. Planting of green corridors to help reduce the visual and noise impacts and provide more environmental protection should have started years ago, let alone being mostly ignored in the current planning, although I note that this has been partially addressed in recommendations listed in the very recently released Visual Analysis Report. Enhancement of the existing trees on Crown land (including that portion of Mary Gilmore Road I currently lease through an annual Enclosed Road permit) should be starting now and financial incentives to cover the cost of fencing, site preparation, trees and site maintenance should be available to us to commence our own tree planting on our properties to extend that. Many of us are keen tree planters. I have just established 400 trees this year, but it is expensive ... and those residents outside of the SAP will not receive the financial windfall that property owners inside the Precinct will as developers rush to their doors. Rather than waiting to explore 'Consideration of the Wagga Wagga SAP through the lens of the United Nations Sustainable Development Goals as an interesting avenue in the latter stages of the project' as noted in the COMMUNITY AND SOCIAL INFRASTRUCTURE ASSESSMENT ... surely if we are being asked to 'shift the narrative to be future focused' this should be happening now when we have the opportunity to at least respond to Sustainable Development Goal #15 Protect, restore and promote sustainable use of terrestrial ecosystems, sustainably manage forests, combat desertification, and halt and reverse land degradation and halt biodiversity loss. Since the SAP is being promoted as having an Ecologically Sustainable Development Plan could its immediate neighbours be encouraged more to reduce the valley's overall Carbon footprint ? Has consideration been given to supporting neighbouring properties to help earn complementary Carbon credits and undertake activities that store Carbon ? Could financial incentives be offered to neighbouring farmers to undertake alternative, more sustainable landuse options and more tree plantings to be protected into the future by Conservation Agreements ? If the SAP is to have a focus on education could this approach be trialed as a potential model of best practice ? Now referring in more detail to the very recently released Visual Analysis Report. The view from my house was not identified as "sensitive" to how it may be changed by development of the SAP and new solar farms. However I believe my view is 'from a private property where the proposal may considerably impact on the liveability or amenity of that property'. To give perspective, it is located further east than Viewpoint 6 Mary Gilmore Road (East), Brucedale and further north than Viewpoint 11 Byrnes Road (Elevated Viewpoint 1). It is 25m from Mary Gilmore Road and less than 50m from the Rural Activity Zone / SAP boundary. Existing views from my house has ROBE, Byrnes Road and the Southern rail line dominating the central landscape and is in very close proximity to the Rural Activity Zone / SAP boundary. The existing solar farms are also quite visible in the East in contrast to the surrounding agricultural / green space with little mitigation and screening. The view also includes existing vegetation, farmland and beyond to a gently undulating landscape of the valley but ROBE, the road and rail line and the solar farms impose on the natural and rural character of the rolling vegetated landscape. At full development of the SAP, the entire middle ground view will be taken up by new built form (including large scale) and solar farms on either side of Byrnes Road and the RiFL. This view, being lower than many other Brucedale properties, will be particularly sensitive to the height of proposed buildings within the SAP and some will encroach on the horizon line. In looking at the modelling completed for the viewpoints chosen for the Visual Analysis Report the new tree planting that has been modelled along the Northern boundary of the Regional Enterprise Zone which builds on some existing trees on Mary Gilmore Road and that which may be planted on the Northern most allotment boundaries of the SAP, may provide an adequate screen/buffer to mitigate the view towards the new industry but significant plantings will need to be considered including taller trees as well as shrubs. Existing vegetation should be retained and protected in the Rural Activity Zone for the purposes of mitigating visual impacts. Existing buildings and farm structures (also with heritage value), including complementary vegetation, currently provide some screening/buffering and should be retained and protected. New plantings on the Northern boundary of the Northern-most existing solar farm would also assist in mitigating views to these elements and colour selections that recede and blend into the landscape should be selected for larger buildings and roof materials (and reflective cladding materials should be avoided). Reducing the height of buildings east of Byrnes Road would aid in reducing potential for skylining above the horizon from this view. Ensuring the establishment and protection of the green infrastructure corridors within the SAP will also help. I support the recommendation from the Visual Analysis Report for tree spacings on rural roads (like Mary Gilmore Drive) to contain 2 - 3 rows and be close enough to create a continuous canopy effect. Although Acacia paradoxa has been recommended for these plantings, I assume for their erosion control, particular growth form, screening qualities and suitability for areas of low maintenance such as road edges, I would encourage the inclusion in all plantings of other more local species to create a more diverse habitat corridor and to consider the use of 2-3 other additional large types of shrubs. Native grasses should also be protected and re-established within these plantings as well as within the Rural Activity Zone to help recreate the moderately timbered landscape with extensive areas of grasses that existed at the time of settlement. I am also concerned about the air quality impacts likely from the SAP but do not have a good enough understanding of the modelling and potential pollutants to properly critique this. However, I am quite fearful of possible impacts on my health, particularly because of my pre-existing asthma condition.

URL: <https://pp.planningportal.nsw.gov.au/WaggaWaggaSAP>