

From: noreply@feedback.planningportal.nsw.gov.au on behalf of [Planning Portal - Department of Planning and Environment](#)
To: [DPE PS ePlanning Exhibitions Mailbox](#)
Subject: Webform submission from: Activation Precincts SEPP and the Wagga Wagga master plan
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Attachments: [REDACTED] [apsubmission.pdf](#)

Submitted on Mon, 14/09/2020 - 14:03

Submitted by: Anonymous

Submitted values are:

Submission Type: I am making a personal submission

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Submission file:

[REDACTED] [waggasapsubmission.pdf](#)

Submission: Please see the attached file. I declare that I have not made any political donations in the previous 2 years. Grahame McDougall

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

Executive Director
Regions, Industry and Key Sites
DPIE NSW

Submission regarding the Activation Precincts SEPP and the Wagga Wagga SAP draft Master Plan

I have been the owner/occupier since 2004 of a 32ha farm property used for a small scale cropping and lamb finishing operation which is located at [REDACTED], within the proposed Rural Activity Zone of the Wagga Wagga SAP.

Aspects of both the Activation Precincts SEPP 2020 and the Wagga Wagga SAP draft Master Plan are opposed for the following reasons.

1. The Activation Precincts SEPP removes any local community input into the approval of potentially hazardous developments or industries.
2. Rezoning under the Activation Precincts SEPP would allow industrial development to have an unacceptable impact on existing residential development in the Brucedale / Mt Pleasant area, compared to current zoning.
3. Solar farms of up to 35 ha will be permitted as Complying Development in the Rural Activity zone, in opposition to the stated aims of the zone.
4. In order to actually achieve the important revegetation and bio screening proposals in the Plan, a specially tasked body should be established to plan, coordinate and carry out the work.

These issues are further discussed below.

1. Need for local input

Potentially hazardous developments and/or industries are permitted to operate under SEPP 33 in the Wagga Wagga SAP, but there should be provision for community consultation, including a site specific analysis, **before** permission is granted for the establishment of such activities. This would facilitate some sense of community ownership of the plan and help to resolve contentious issues regarding such developments.

It is not acceptable to have the Development Corporation making such determinations without local input.

2. Negative impact on existing Brucedale residents

Objection is taken to the claim in section 3.2.1 of the Activation Precincts SEPP discussion paper that "... the Regional enterprise Zone is approximately the same area as the existing General Industrial Zone under Wagga Wagga LEP 2010 but has been reconfigured to **maximise separation between industry and nearby residential communities.**" Clearly, the changes bring the industrial area much closer to Brucedale and the Mt Pleasant community, being about 700 metres from the Brucedale Hall, for instance.

Visual amenity would be substantially reduced for existing residents under the SAP, as well as them being subjected to increased noise and air pollution. Industrial development should not occur north of Trahairs Road.

3. Solar Farms in the Rural Activity Zone

Objection is raised to the proposal to allow, as Complying Development, a number of 35 ha solar farms within the south western part of the Rural Activity Zone, for the following reasons.

Allowing solar farms in the Rural Activity Zone would completely negate the stated objectives of the zone, specifically, "*to protect and enhance the rural character of the precinct and contribute to the surrounding environment and its amenity.*" (SEPP amendment No.1 discussion paper, p. 14)

As a resident of a rural holding on Poiles road which overlooks a significant part of the western buffer zone south of Sutherland's road, any solar farm developments here would have a negative impact on our visual amenity due to glare and the presence of highly visible industrial structures.

It is noted in the Visual Analysis report Viewpoint 3, that tree plantings and solar farm location in this area are chosen to minimise the visual impact on Brucedale residents. In the process the impact on the view from our property would be significant, even with vegetative screening, due to its close proximity within some few metres of our Poiles road boundary. This is represented in the photograph attached to this document.

The purpose of having solar PV generation facilities in the rural buffer zone is clearly NOT to provide electricity for the nearby industrial area, as only minor amounts would be required during stages 2 and 3, with WSP consultants estimating a need for 7 MW by 2060 (Table 4.1). This could be generated by a solar farm of about 20ha using present technology. These proposed solar farms are purely industrial activity in what is intended to be primarily a rural zone.

The proposal to allow "*small scale*" solar farms in the western part of the Rural Activity zone is therefore opposed because they could not be accommodated without significant environmental and visual impact and would occupy prime agricultural land.

4. Revegetation and bio screening

The Draft Master Plan correctly places emphasis on the role of revegetation and tree planting in such locations as industrial lot boundaries and along roads and watercourses, to provide bio screening to enhance the visual amenity of the SAP, improve biodiversity and reduce pollution impacts.

It would be highly desirable to have this process planned and executed across the SAP by a specially tasked and funded entity, so that the selection, establishment and maintenance of suitable species is reliably achieved. There have been implementation failures in the past, notably around the ROBE canola processing plant for instance, and some existing residents, especially in the buffer zone, are justifiably sceptical of the delivery of such plans, which should be an integral part of the overall development.

VIEW TO
THE EAST
FROM
RESIDENCE
AT

██████████ S
██████

10/9/20

2:09 pm

POILES ⇒
ROAD

|||||
PROPOSED
SOLAR FARM
35 ha.

