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**To:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Subject:** Webform submission from: Activation Precincts SEPP and the Wagga Wagga master plan  
**Date:** Monday, 14 September 2020 12:51:24 PM  
**Attachments:** [REDACTED] [\\_wagga\\_sap.pdf](#)

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Submitted on Mon, 14/09/2020 - 12:47

Submitted by: Anonymous

Submitted values are:

Submission Type: I am making a personal submission

First Name: [REDACTED]

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Submission file:

[REDACTED] [\\_wagga\\_sap.pdf](#)

Submission: Please see attached submission. I have made no political donations. [REDACTED]

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

## Comments on the SEPP Amendment (Discussion Paper) and the Draft Master Plan for the Wagga Wagga Special Activation Precinct

I have lived at [REDACTED] for over 15 years and there are some aspects of the Wagga SAP which I do not support. Residents in the rural zone have been misled and confused on the issue of small-scale solar farms, by ambiguous and contradictory statements in the SEPP Amendment and the draft Master Plan. Examples are as follows:

1. **The draft Master Plan, under “Vision” at page 20, states:** *“The (Rural) Precinct will be developed in a way that respects and protects the amenity enjoyed by residents at Cartwrights Hill, Eunony Valley, Brucedale and adjoining rural residential areas.”* There is no mention of solar farms here.
2. The stated **Vision at page 21 of the draft Master Plan** is: *“The precinct will aim to supply 100% of its energy from renewable opportunities.”*

**The Report on Renewable Energy Opportunity and Constraints Analysis at Table 4.1.** shows that the actual projected need for additional solar power from the Rural Agricultural Zone is only **7MW**, even at Stage 3 of development (from 2030 to 2060 and beyond). The remainder is to come from large-scale solar farms, rooftop solar and various renewable sources of energy within the SAP, in keeping with the so-called “circular economy”.

Since the area of land needed for solar panels to generate power is around 2-3 hectares per MW (as per the same report), it follows that up to 21 Ha are needed to make up the shortfall in renewable energy in the SAP. If this is the case then no more than 1 small-scale solar farm of 35 Ha should be needed. Why then is the draft Master Plan talking about multiple solar farms in the rural zone, and the Visual analysis report is proposing at least 6? This is over and above the needs of the SAP, so is there an intention to allow solar energy generation as an industry in its own right? I object to the building of solar farms in the rural zone for that purpose as it would contravene the stated role of the rural zone in the “vision” of the SAP, and in the “objectives” – see point 3 below.

3. **The SEPP Amendment (Discussion Paper), at Section 3.2.3 Land Use Tables,** defines the **Objectives of the Rural Activity Zone** (page 14) as:
  - “To provide a rural interface between surrounding land uses
  - To protect and enhance the rural character of the precinct and contribute to the surrounding environment and its amenity
  - To provide an inter-urban break between future residential and employment growth areas supporting the long-term growth of Wagga Wagga
  - To support small scale, low impact agricultural/rural uses.”

These objectives sound pleasantly benign but are a misrepresentation as they fail to reveal that some of this land will be used for solar farms.

4. **Visual Analysis** for location of small-scale solar farms in the Rural Zone has also been inconsistent.

The Structure Plan Visual Analysis has now been released showing locations of “potential” 35-Ha solar farms proposed in the western part of the Rural Activity Zone. This analysis was carried out without assessing my property or any location close to it. The result is that the original position of the Northern-most small-scale solar farm has been moved to an alternative location on Poiles Road, away from Sutherlands Road, following Visual Analysis at Viewpoints 3 and 8. This “alternative location” places a 35-Ha solar farm directly across the road from my house. I can accept that there will be views of the industrial zone in the distance, but I object to the prospect of overlooking a solar farm directly across from my road frontage, both from within and outside of my house.

The VA report lists the criteria for testing various “viewpoints” to analyse how they are affected by new solar farms. **The viewpoint from my property was obviously not assessed** despite meeting at least 3 of the 5 stated criteria which are highly relevant to my location:

- ***“The view has an intensity of public use such as that of a major roadway or entry point to a region/place.”*** Poiles Road is used frequently, not only by local residents. There is considerable use by clients of livestock agistment properties to the north of the SAP area, tradesmen, contractors of agricultural services, and groups of cyclists and horse riders who perceive it as a safe and scenic alternative route to the major sealed roads.
- ***“The view is from a private property at an elevated location.”*** The house is set back about 300 metres to the west of Poiles Road in an elevated position on my 32-Ha property, overlooking Poiles Road, the Rural Zone and the Regional Enterprise Zone.
- ***“The view is from a private property where the proposal may considerably impact on the liveability or amenity of that property.”*** As above. I don’t mind too much if I have to drive past (some) solar panels elsewhere on Poiles Road, and I can accept that the industrial zone will be part of more the distant vista. **But to have a solar farm on the doorstep of my property, when the main attractiveness and amenity of the location is in the exact outlook towards that solar farm, warrants serious reconsideration.**

**My house is the only residence on the western side of [REDACTED] in the entire SAP, and it should have been evaluated under the criteria for visual impact from solar farms.** The only location west of [REDACTED] to be tested for visual impact is on the western boundary of the SAP at a point west of the ridgeline (viewpoint 9). Of course you can’t see any of the SAP from there because it’s on the other side of the ridgeline! My house lies 500-600 metres east of viewpoint 9 and has an excellent view of the western rural zone across to the industrial zone.

#### **In summary:**

- I ask the Department to review the need and true purpose for small-scale solar farms in the rural zone.
- I also ask for a visual analysis from my property, as a solar farm right on my front boundary would cause a considerable loss of amenity.