

7 July 2025

Rachael Helsham  
Environmental Assessment Officer  
Energy, Resources & Industry Assessments  
Department of Planning, Housing and Infrastructure

[rachael.helsham@dpie.nsw.gov.au](mailto:rachael.helsham@dpie.nsw.gov.au)

**Wattle Creek Solar Farm (SSD-63344210) and Wattle Creek BESS (SSD-63345458) projects.**

### **Informal Feedback from Wingecarribee Shire Council**

Thank you for the opportunity to comment on these proposals. Council provides the following informal commentary on the proposal.

#### **1. Limited Study Area Excludes Elevated Viewpoints in WSC**

The Landscape and Visual Impact Assessment (LVIA) restricts its detailed assessment to a 5 km radius from the project boundary. This fails to adequately consider elevated landforms east of the development site within Wingecarribee Shire, which are capable of experiencing line-of-sight views over the proposed development from many locations, including:

- Canyonleigh
- Elevated portions of Tugalong Road
- Ridgetop properties adjoining including rural residences with long-range western outlooks

These elevated zones fall outside the 5 km field assessment but are within the theoretical Zone of Visual Influence (ZVI) shown in Figures 6, 13, 14, 23, 24, 26 of the document as denoted by the blue and purple shading across substantial portions of eastern land in Wingecarribee Shire.

No detailed visual assessment, photomontage, or sensitivity evaluation appears to have been provided for these areas.

---

#### **2. Community Submissions Indicate Concern from WSC Residents**

Numerous community submissions in the EIS reference visual amenity concerns and view loss from properties in Tugalong, Mt Penang, Paddys River and nearby locations which are all located within the Shire. Despite this, the LVIA does not include targeted viewpoints or ground-truthed validation in these locations.

This is a significant omission, as the EIS acknowledges that submissions raised concerns about visual impact from areas within Wingecarribee, yet it does not follow through with assessing these locations.

---

### 3. Topographic and Vegetation Filtering Assumptions May Not be Valid

The LVIA assumes that intervening topography and vegetation will sufficiently screen the project from WSC vantage points. However:

- Large parts of the Shire east of the site lie at elevations above 700m AHD, higher than the development site (~ 680m AHD), which may afford clear views westward across the site.
- Assumptions of vegetative screening may be unreliable, particularly in open pasture blocks or cleared ridgetops, common in rural WSC areas

### 4. Further Consideration of Potential Traffic Impacts

The proposed transport route assumes that vehicles will not use alternative access routes. There is no mechanism to prevent alternative routes being utilised which may have more impact within the Shire than indicated in the proposal. The ability to manage compliance with proposed routes should be addressed.

## RECOMMENDATION

Council requests that the proponent undertake an expanded LVIA, or a supplementary visual assessment, that includes elevated view-sensitive areas within Wingecarribee Shire east of the project site.

Furthermore, Council requests:

- The addition of new photomontages or visual simulations from key elevated locations within the Wingecarribee Shire.
- Consideration of the cumulative long-range impacts on landscape character from the regional perspective.
- Engagement with affected Wingecarribee residents in future consultation or design refinement.
- Further consideration of the management of proposed transport routes.

For further communication, please contact Susan Stannard, Acting Manager Strategic Outcomes, [susan.stannard@wsc.nsw.gov.au](mailto:susan.stannard@wsc.nsw.gov.au)

With regards



**Barry Arthur**  
**Acting Director Communities and Place**