

12 June 2018

Meghna D'Souza
Resource and Energy Assessments, Planning Services
Department of Planning & Environment
GPO Box 39
SYDNEY NSW 2001

Dear Ms D'Souza

Re: Submission- Development of a large-scale solar photovoltaic (PV) generation facility and associated infrastructure, Bomen

Thank you for opportunity to provide comments with regard to the above-mentioned state significant development at Bomen.

The Bomen Industrial Area is identified as a significant growth area that plays an important part of the region's economy. The Inland Rail project in Bomen will open up Melbourne and Brisbane ports, and the Bomen Industrial Park supported by the Riverina Intermodal Freight and Logistics (RiFL) Hub will be one of the most important freight and logistic destinations and hubs in Australia.

Wagga Wagga City Council supports the sustainable solar energy industry and acknowledges that there is broad public support for the adoption of alternative, renewable, low emission energy generation sources. The proposed development will provide diversification of the local economy and the building of local skills, consistent with city's long term economic growth strategy.

At a broader level, this project will also provide significant skills and expertise in the construction of large scale solar thereby providing a foundation to support the development of future large scale solar projects in NSW.

Consistency with strategic intent

The proposal is consistent with the following strategic documents that supports clean and renewable energy projects in Bomen.

- Riverina Murray Regional Plan
- Wagga Wagga Spatial Plan
- Draft Activation Strategy
- Wagga Wagga LEP
- Wagga Wagga DCP

Under the provisions of the Wagga Wagga Local Environmental Plan 2010 (LEP), the subject site is within the General Industrial (IN1) zone. The proposed land use is consistent with the State Environmental Planning Policy (Infrastructure 2007) which permits solar energy systems in the industrial zone.

The proposed land use is also permitted with consent in the IN1 Zone on the basis that it is not listed as either permitted without consent or prohibited. The objectives of this zone are:

- *To provide a wide range of industrial and warehouse land uses.*

- *To encourage employment opportunities.*
- *To minimise any adverse effect of industry on other land uses.*
- *To support and protect industrial land for industrial uses.*

The development is of a nature that is compatible with the long term vision of Bomen and the Bomen Master Plan that has a strong focus on enabling renewable energy in the locality.

The proposed solar energy system would not inhibit the future potential of the land to be developed for industrial purposes in accordance with zone objectives. The proposed solar energy system will be a relatively innocuous use with very low levels of ongoing impact to amenity. The project lifespan for the facility is approximately 25 years after which the facility may be upgraded with new technology or will be decommissioned and the land be made available for another land use consistent with the industrial zoning of the land.

The proposed development has the potential to conflict with other land uses however, as explained in more detail below, can be managed and operated in a manner to reduce the impacts on existing and potential future land uses in the locality.

Amenity

The site is located within an industrial area, with developed industrial sites to the west and south-west. Even though the site is zoned for industrial purposes, it is currently characterised by broad acre farming enterprises, including cropping and grazing with regular use of machinery.

The site development plan submitted with the application sufficiently indicates the site constraints in terms of land form, orientation and accessibility. The natural contours of the site result in a natural drainage pattern and will not be altered as a result of the proposed development. Consideration of the effect of the proposed development on the site has been undertaken, and it is considered that the proposal will be able to be managed in a way to minimise impacts on the environment.

The use of the site as a solar energy system would not lead to any ongoing impacts that would detrimentally impact on the way of life or operations of nearby properties. The Vista of solar panels is a significant change from cropping and grazing issues. This precinct has been identified for major industrial land uses and the transition away from agriculture to industry will alter vistas in the precinct.

It is considered that from a long term sense the proposal will be entirely consistent with the character of the area and entirely compatible with adjacent land uses.

The eastern precinct of Bomen is currently undergoing transition from a rural area to an industrial area and there will be some potential for conflict and inconsistencies in character. These short term effects are unavoidable during these transitional stages, however, a strategic decision has been made for the conversion of the locality to industrial uses, and therefore considered acceptable.

Impacts to adjacent land uses would be primarily related to the construction period. Impacts associated with this would be controlled and managed through the implementation of a Construction Management Plan. Subject to the implementation of the management plan, it is considered that the development would not detrimentally impact adjacent properties.

Consistency with the approved Master Plan

Section 13 of the Wagga Wagga DCP 2010 establishes preferred land use patterns in Bomen to ensure access to transport infrastructure and also sets out a hierarchy of possible direct and legible routes through and within Bomen. The DCP provides a framework of infrastructure corridors to provide the basis for and to facilitate a logical roll out of staged development in a flexible manner.

The objectives include efficient use of land, and existing and new infrastructure, water collection and reuse, preservation of native vegetation, and improvement of existing vegetated and creek line areas. Bomen Master Plan that has a strong focus on enabling renewable energy in the locality and the proposal generally complies with the overall objectives and meet the outcomes sought for the Bomen Industrial Area.

It should be noted that Council is also currently in the process of reviewing the DCP. The city strategy team has embarked on developing an employment strategy and revised master plan for Bomen. Initial information drawn from the study is that the eastern side of the Bomen industrial area is well suited for renewable energy projects in the form of solar farms as an interim use during the transformation of the area from rural to industrial uses consistent with the industrial zoning that applies.

Council supports the proposed development per the aforementioned discussion. Should you have any further questions please do not hesitate to contact Tristan Kell - Manager City Strategy 02 6921 9122.

Kind regards



Peter Thomson
General Manager