

Talia Walker

From: noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment
<noreply@feedback.planningportal.nsw.gov.au>
Sent: Tuesday, 15 June 2021 8:04 PM
To: DPIE PSVC Special Activation Precincts Mailbox
Cc: DPE PS ePlanning Exhibitions Mailbox
Subject: Webform submission from: The draft Moree Special Activation Precinct Master Plan
Attachments: munro-family-submission-to-the-moree-sap-public-exhibition.pdf

Submitted on Tue, 15/06/2021 - 19:58

Submitted by: Anonymous

Submitted values are:

Submission Type

I am submitting on behalf of my organisation

Name

First name
[REDACTED]

Last name
[REDACTED]

I would like my submission to remain confidential

Yes

Info

Email
[REDACTED]

Suburb/Town & Postcode

Moree 2400

Please select if you support or object the Moree SAP

Support

Submission file

[REDACTED] [submission-to-the-moree-sap-public-exhibition.pdf](#)

Submission

[REDACTED] Submission to the Moree SAP Public Exhibition 15.06.2021 8.02 PM

I agree to the above statement

Yes



15 June, 2021

Our Ref: 210149

The Executive Director
Key Sites and Regional Assessments
Department of Planning, Industry and Environment
Locked Bag 5022
PARRAMATTA NSW 2124

COPY BY EMAIL:
Brendan.nelson@rgdc.nsw.gov.au

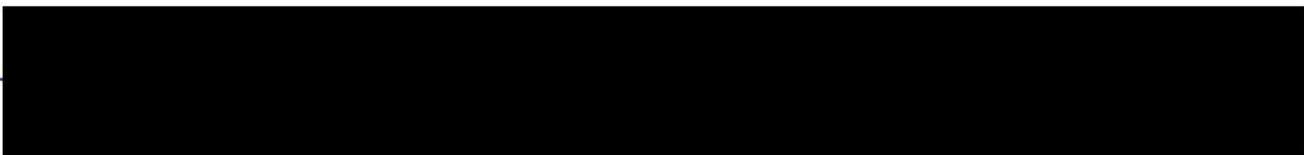
Dear Mr. Nelson,

RE: THE SPECIAL ACTIVATION PRECINCT MOREE DRAFT MASTER PLAN MAY 2021

We act for the  and its associated entities.

In accordance with the invitation extended to the family, we have been instructed to forward to you the Submission annexed. Our clients and their advisors will be happy to meet with your representatives to discuss, clarify and elaborate on any of the matters covered in the Submission.

Would you kindly acknowledge receipt.



SUBMISSION BY [REDACTED] [REDACTED] IN RESPECT OF STATE ENVIRONMENTAL PLANNING POLICY AMENDMENT No. 3 – INTRODUCTION OF MOREE SPECIAL ACTIVATION PRECINCT DISCUSSION PAPER

AND

SUBMISSION BY [REDACTED] IN RESPECT OF SPECIAL ACTIVATION PRECINCT MOREE – DRAFT MASTER PLAN

1. Introduction

Thank you for the opportunity to comment on the State Environmental Planning Policy (Activation Precincts) 2020 - Amendment No.3 – Introduction of Moree Special Activation Precinct Discussion Paper and the Special Activation Precinct Moree – Draft Master Plan now on public exhibition.

This submission has been prepared by [REDACTED], on behalf of two landowners invited to make submissions, [REDACTED]

Through its related entities, the [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED] to deliver strong, research backed, innovative, value-added supply chains to the next generation growth markets through close collaborations, environmentally sustainable best practice, nutritional fundamentals and food chain security.

Austgrains has been recognised by the Federal Industry Growth Centres, Food Innovators Australia and Advanced Manufacturing for innovation and supply chain security in the grain industry. Austgrains regularly presents at international milling conferences and forums and collaborates with industry and

academic institutions and Government agencies to support the regional community through food production, nutrition research and higher-value job creation.

[REDACTED]

The Moree SAP encapsulates the below described lands owned by the following entities associated with the [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]
[REDACTED]

[REDACTED]

[REDACTED]

These landholdings comprise an area of approximately [REDACTED], or approximately 16% of the entire Moree SAP and 17.5% of the [REDACTED].

These landholdings extend to the [REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]

The majority of the land is currently zoned [REDACTED] within the Moree Plains Local Environmental Plan 2011 (**Moree LEP**).

[REDACTED]
[REDACTED]

The land is well serviced by utilities infrastructure including power, gas-water, sewer, NBN, and Transgrid Fibre with potential access to the proposed Hunter Gas Line. It is also relatively unconstrained by flooding and identified Aboriginal Archeology.

These landholdings are, however, critical to the efficient and economical farming of the [REDACTED] entire agriculture enterprise.

2. Moree SAP proposals for the land

[REDACTED] described above are included in the Moree SAP Structure Plan and Moree SAP Draft Master Plan and form a large part of the General Enterprise Sub-Precinct. A small area of land to the south-east is identified as part of the Central Solar Sub-Precinct.

The Moree SAP Draft Master Plan proposes that the above-described landholdings will be zoned Regional Enterprise Zone.

The draft Master Plan proposes that the following key enabling road and rail infrastructure and priority early works be located on the lands:

- East-West Connector Moree by-pass (Strategic Corridor)
- An Intermodal Loop
- A future Northern Intermodal
- Associated infrastructure batters, buffer zones and drainage basins
- The internal road network and intersections
- Early works and construction areas

[REDACTED] situated to the north across the [REDACTED]
[REDACTED] to service future Moree SAP expansion.

[REDACTED] are therefore pivotal to the delivery of early infrastructure works, and the successful development of the Draft Master Plan over the 40-year time horizon envisaged for the Moree SAP.

3. Overview

The 40-year vision for the Moree SAP is to establish a world class high value, agricultural and horticultural production, processing, and distribution hub, supported by sustainable resource use, and embracing new technologies and innovative energy solutions. This vision is generally supported and in part strongly supported.

The region's historic strength in agriculture and primary production, its emerging capability in value adding processing, secure water supply, and significant renewable energy potential, needs to be leveraged to generate economic growth and business and employment opportunities for Moree and the surrounding region.

Moree is strategically located at the junction of the Newell, Carnarvon, and Gwydir Highways, has existing rail connections to Newcastle and Botany Ports, and will have a direct interface with the Melbourne to Brisbane Inland Rail. It has good access to regional centres in regional NSW and south-east Queensland and wider connections via Moree Regional Airport.

The Moree SAP is a unique, once in a generation opportunity.

The Moree SAP has the potential to address the Moree Plains LGA's declining population and contribute significantly to high value job creation and economic development.

Handled well, it has the prospect of improving social and economic opportunities for the Moree Aboriginal community.

Unfortunately, however, the Draft Master Plan has little detail regarding the Development Enablers (7.1) to be determined through the Delivery Plan to be prepared by Regional Growth NSW Development Corporation (**RGDC**) and ultimately approved by the Department of Planning, Industry and Environment.

The Draft Master Plan is silent on the timing, staging and process for the preparation of the Delivery Plan, Sub-Precinct Master Plans and level of engagement proposed with landowners and key stakeholders in the formulation of the Development Plan.

It is also silent on the land actually required for key enabling infrastructure and if developer contributions for infrastructure via a Special Infrastructure Contribution or similar mechanism is proposed.

Without this critical information it is difficult to make definitive comment on the impact of the Draft Master Plan on short to medium term farming operations, or on the longer-term development potential of the [REDACTED] both within and adjacent to the Moree SAP.

The [REDACTED] and its advisors wish to be actively involved and to be a partner with Government and potential investors and developers in the planning process for the Delivery Plans, and in the actual delivery of the uses within the Moree SAP, including, but not limited to:

The enterprise mix was simplified and a new management team and structure put in place.

The announcement and public exhibition of the Moree SAP has already had a disruptive impact. The uncertainty that existing around the associated staging and timing of infrastructure works, and the extent of the impact on farming operations, has already interfered with the business plan and had an unsettling effect on the farm management team during a peak period of planting. Understandably, the team is fearful of job loss.

Similarly, contractors to the [REDACTED] have expressed concern about investments they have made in plant and machinery and the flow-on impact on their contracting businesses.

The key issue for farmers in the Moree district, and indeed nationally, is the attraction and retention of an appropriate workforce. Obviously, the entry of seasonal workers and farm worker portability between States during the on-going COVID-19 pandemic, has and will continue to be a major issue.

Farm operation impacts identified at this stage include:

- Robust budgets and cashflow forecasts submitted to banks are required to be met and maintained to ensure on-going viability;
- Loss of productive land results in inefficiencies and key benchmarking ratios such as TPML (Total People, Machinery and Land managed) thus increasing costs per hectare;
- Reduced 5-year crop rotations process: Winter cereal – Winter Pulse – Winter Cereal – LF – Summer Crop -Double cropping the Summer Crop Sorghum/CP;
- Access between lots for workers, plant and machinery;
- Farming is now a high technology business. Reduction of footprint reduces the cost effectiveness of current infrastructure and machinery investment e.g., silos, commodity sheds, tractors, spray rigs, headers, planters + air cart, chaser bins, augers, GPS equipment;
- Heightened exposure to grain marketing risks as well as climate exposure with diminished farming capacity e.g., rain at harvest; less area less grain produced and available to sell;
- In modern farming reduced footprint equates to increased cost and return per hectare;
- Slowing of the business capacity to earn the right to invest;
- Compromising the enviable position and paddock shortcuts to major grain handling facilities, services, and consultants – time is money;
- Provenance of grain from known history of paddock usage and treatments due to our HGP and antibiotic free status.

4. SUBMISSION ON AMENDMENT No. 3 – Introduction of Moree Special Activation Precinct – Discussion Paper

The following comments are made on proposals for Amendment No.3 – Introduction of Moree SAP contained in the Discussion Paper (with reference to section numbers)

2.3 *The SAP Framework* – Moree SAP Delivery Plans should provide strategies and plans for Social Outcomes, including social and community infrastructure.

2.4 *The application process* – Proposals for streamlining and expediting planning and environmental approvals processes through Exempt Development, Complying Development and Activation Precinct Certification are supported.

3.1 *Areas to which the Activation Precincts SEPP applies* – The “turning off” of the Moree Plains LEP within the Moree SAP and the introduction of specific controls is supported.

3.2.1 *Intent of the land use zoning strategy* – The intent of the Moree SAP Regional Enterprise Zone is supported.

3.2.3 *Land Use Tables*

Regional Enterprise Zone – The objectives of the zone are supported as are the uses permitted without consent and with consent.

It is noted that horticulture, hydroponics and aquaculture are not specifically mentioned in the uses permitted with consent. They are uses for which there is likely to be demand in the Regional Enterprise Zone, are compatible with objectives on the zone and should be permitted with consent.

Prohibited Uses – It is proposed that neighbourhood supermarkets, small bars and tourist visitor accommodation be prohibited. This could well be counterproductive and should be reconsidered.

Neighbourhood supermarkets of a scale that will not compete with the Moree Town Centre may well be appropriately located on the proposed “nodes” that will service the working and visiting population of the General Enterprise Sub-Precinct. A small neighbourhood supermarket may also be co-located with highway service facilities and heavy vehicle driver accommodation located close to the Gwydir Highway. They should be permitted with consent.

Small bars are often associated with craft brewery and craft spirit distilleries. It is highly likely that these types of uses, building on the area’s reputation for high quality grains, will be attracted to the Regional Enterprise Zone. This would support the value-add, place-making, destination, employment, and tourism objectives of the Moree SAP. These uses should be permitted with consent.

There is also likely to be demand for Tourism and visitor accommodation along the Gwydir Highway and potentially in the “nodes”. This should be permitted with consent.

3.2.5 *Activation Precinct Certificates* – The framework is supported.

3.2.6 *Complying Development* – The provisions for Complying Development is supported.

3.2.8 - 3.2.17 Provisions are supported. It is noted that a re-alignment of the TSR is proposed on [REDACTED] [REDACTED] to facilitate more orderly development of industrial land uses.

3.4 *Delivery Plans* – See previous comments on the lack of detail on timing, staging, process and engagement and the request for active involvement by the [REDACTED] and advisors in the preparation of the Delivery Plan.

5. **SUBMISSION ON Special Activation Precinct Moree – Draft Master Plan**

2.1 Vision and Principles – The Vision for the Moree SAP that underpins the Draft Master Plan clearly articulates the future desired outcome for Moree and the region.

The Executive Summary refers to Principles falling into seven overarching themes – Sustainability, Social Outcomes, Economic Outcomes, Aboriginal Planning and Design, Environment, Movement, and Infrastructure. These themes are not referenced further in the Draft Master Plan.

The Principles which support the Vision, are identified as The Place, Connection to Country, Environment and Sustainability, Social and community Infrastructure, Economic and Industry and Infrastructure and Connectivity.

The balance of the document does not reference or relate the Themes and Principles to the content of sections. In the final document it would be helpful to draw a clearer connection between Themes, Principles, Aims and Performance Criteria.

2.2 Structure Plan

The Structure Plan (Figure 9) does not identify potential commercial hubs or “nodes” to support workers and visitors. It is assumed these will be identified through Sub-Precinct specific master plans as part of the Delivery Plan. Nodes should have good accessibility, located in the highest areas of employment concentration and walkable. Neighbourhood shops, food and drink and business premises, tourist and education facilities, community facilities and open space should be co-located to form a high activity hub that would form part of the place-making strategy.

We suggest that suitable locations for consideration include (see Map 3).

3.1 Land Use and Zoning

The Aims and Performance criteria are supported.

3.2 Place and Landscape

The Aims and Performance criteria are supported. In particular, the commitment to Gamilaroi cultural heritage is welcomed.

4.1 Biodiversity, vegetation, and riparian corridors

The Aims and Performance criteria are supported. However, further work is required to validate the presence of protected vegetation (Figure 17) between the Inverell Rail Line and the Gwydir Highway.

4.2 Air Quality and Odour

The Aims and Performance criteria are supported.

4.3 Noise

The Aims and Performance criteria are supported.

4.4 Bushfire

The Aims and Performance criteria are supported.

4.5 Flood Risk Management

The Aims and Performance criteria are supported. However, further work is required to validate flood prone land identified (Figure 23) in the northwest corner of the SAP area particularly having regard to the ARTC proposed works.

4.6 Water Resources (Stormwater and Groundwater

The Aims and Performance criteria are supported. The protection of groundwater resources is vital for current and future high value agricultural and horticultural activities within the Moree SAP and the surrounding region.

4.7 Assessing hazardous and offensive development

The Aims and Performance criteria are supported.

4.8 Managing development on contaminated land

The Aims and Performance criteria are supported.

4.9 Fire, safety, Human Health and Biosecurity

The Aims and Performance criteria are supported.

4.10 Sustainability and Climate Change

The Aims and Performance criteria are supported.

5.1 Transport network

The key enabling transport infrastructure for the Moree SAP is proposed to be largely located on the [REDACTED]. The capacity to handle the growing agricultural freight task will be significantly enhanced by the proposed east-west connector. It will facilitate improved movement of freight from the west of Moree into the Moree SAP and over time its extension to the north-west to connect to the Gwydir Highway will link freight movement into and out of the Moree SAP.

The east west connector holds the key to reducing the passage of freight traffic through Moree township and impact of heavy vehicles on the amenity of the town.

5.2 Road network performance and active transport

The Aims and Performance criteria are supported.

5.3 Rail network performance

The Aims and Performance criteria are supported.

6.1 Protection of airport operations

The Aims and Performance criteria are supported.

7.1 Development enables

This is the least developed component of the draft master plan.

The Draft Master Plan is silent on the timing, staging and process for the preparation of the Delivery Plan, Sub- Precinct Master Plans and level of engagement proposed with landowners and key stakeholders in the formulation of the Development Plan.

It is also silent on the land actually required for key enabling infrastructure and if developer contributions for infrastructure via a Special Infrastructure Contribution or similar mechanism is proposed.

Without this critical information it is difficult to make definitive comment on the impact of the Draft Master Plan on short to medium term farming operations or on the development potential of the [REDACTED] [REDACTED] both within and adjacent to the Moree SAP.

[REDACTED] and its advisors wish to be actively involved and to be a partner with Government and potential investors and developers in the planning process for the Delivery Plans, including:

- The sub-precinct master plan for the General Enterprise Precinct and Central Solar Sub-Precinct and adjacent Sub-Precincts that may impact the land, including details of enabling infrastructure corridors, road layout, location of “nodes”, lot sizes, landscape and buffer treatments, place-making elements, etc;
- Identification of development controls and development standards;
- Detailed strategies and plans for Aboriginal cultural heritage, environmental protection and management, social outcomes, protection of amenity
- Identification and attraction of businesses synergistic with established agricultural operations;
- Opportunities for solar and hydrogen development;
- Timing and staging of infrastructure delivery, early works and general enterprise development opportunities;
- Opportunities for strategic joint venture arrangements to develop the land;
- Discussion on any developer contributions regime;
- Procedures for ongoing monitoring and reporting;
- Other Delivery Plan matters that impact the land.

Importantly, while development is proposed to be “Government-led” through the RGDC’s “one stop shop” planning, facilitation and Business Concierge role, the development process should not preclude strategic partnership arrangements between landowners and/or Government and developers, businesses, and investors as a mechanism to achieve the desired development outcome

6. REPORTABLE POLITICAL DONATIONS

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Dated: 15 June 2021

