

**From:** [Doris Yau](#)  
**To:** [Melissa Halloran](#)  
**Cc:** [Joanna Bakopanos](#); [Chris Ritchie](#); [Kate Masters \(Planning\)](#)  
**Subject:** Wagga Wagga Special Activation Precinct - Submission  
**Date:** Wednesday, 7 October 2020 11:35:08 AM  
**Attachments:** [image001.jpg](#)

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Hi Melissa,

Following review of the draft master plan and discussion paper, our team would like to raise the following issues associated with Wagga Wagga SAP.

1. It is noted that complying development will be the key planning pathway applying to SAP. This permits potentially hazardous development as a complying development. Based on the information from Master Plans, these potentially hazardous development will require to submit a preliminary hazardous analysis (PHA) in accordance with the Guidelines associated with SEPP 33. This PHA will also need to be reviewed and approved by the Department.

This approach has two major issues:

- a. Potentially hazardous development can be development that stores and transport dangerous goods above SEPP 33 quantities thresholds as listed in *Applying SEPP 33*. It can also be development that process food material or timber, such as grain, flour mill, sugar mill, that is not trigger by dangerous goods handling but due to the potential of dust explosion, and it can also be any new technology (such as Hydrogen generation and refuelling station) that requires further research on the potential land use safety impact. It is a land use safety risk to public if these development are not properly assessed and ongoing operation risk is not appropriately managed through post-approval requirements prepared and approved by required technical experts.
- b. Potentially hazardous development often will be conditioned with post-approval requirements including periodic hazard audit to ensure the operation can continue minimise its risk. It is my understanding that complying development certifier will need to sign off these document and it is highly questionable whether the certifier has sufficient technical expertise to sign off these documentation.

Based on the above complexity, it is in our opinion that complying development is not an appropriate planning pathway for potentially hazardous development

2. It is noted that hydrogen energy generating facility could be a complying development in the Discussion Paper, subject to further risk analysis. As mentioned above, hydrogen energy generation is a new technology that recently gaining a lot of attention worldwide. As a new technology in NSW, there could be a lot of unforeseen risks that require careful consideration. A lot of hydrogen related incidents have been reported in the past few years. It will be immature to allow hydrogen energy generating facility as complying in this early stage. Such development should be appropriately assessed in pre-approval stage and operated in longer time frame to enable full understanding on its potential impact.

Should you require further clarification on the above, please feel free to contact me.

Regards

**Doris Yau**

**Team Leader - Hazards**

**Department of Planning, Industry & Environment**

4 Parramatta Square, 12 Darcy Street | Locked Bag 5022 | Parramatta NSW 2124

[REDACTED] [nsw.gov.au](https://www.nsw.gov.au)

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**From:** Doris Yau

**Sent:** Wednesday, 30 September 2020 3:51 PM

**To:** Melissa Halloran <[REDACTED]>

**Cc:** Joanna Bakopanos <[REDACTED]> Chris Ritchie  
<[REDACTED]>

**Subject:** RE: Wagga Wagga Special Activation Precinct - Exhibition of Draft Master Plan and Discussion Paper

Hi Melissa,

Just realized we will need to provide comment on this exhibition. As I will be on leave from tomorrow, we will be providing a late submission on the SAP late next week. Hopefully this is acceptable.

Regards,

Doris

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**From:** Melissa Halloran <[REDACTED]>

**Sent:** Tuesday, 21 July 2020 9:33 AM

**To:** Chris Ritchie <[REDACTED]>

**Cc:** Joanna Bakopanos <[REDACTED]> Doris Yau  
<[REDACTED]>

**Subject:** RE: Wagga Wagga Special Activation Precinct - Exhibition of Draft Master Plan and Discussion Paper

Sorry, I sent you the back-end link, try this one

<https://www.planningportal.nsw.gov.au/WaggaWaggaSAP>

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**From:** Melissa Halloran

**Sent:** Tuesday, 21 July 2020 9:24 AM

**To:** Chris Ritchie <[REDACTED]>

**Cc:** Joanna Bakopanos <[REDACTED]> Doris Yau  
<[REDACTED]>

**Subject:** Wagga Wagga Special Activation Precinct - Exhibition of Draft Master Plan and Discussion Paper

Hi Chris,

I'm writing to let you know that the draft Master Plan for the Wagga Wagga Special Activation Precinct, associated technical studies and a Discussion Paper outlining the proposed amendment of *the State Environmental Planning Policy (Activation Precincts) 2020* (to add the Wagga Wagga Special Activation Precinct) are now on exhibition.

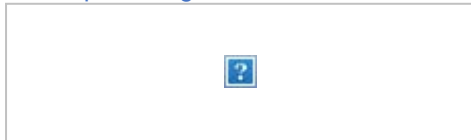
For further information please visit <https://pp-dev.planningportal.nsw.gov.au/WaggaWaggaSAP> or feel free to reach out to myself with any questions you might have.

Kind regards  
Melissa

**Melissa Halloran**  
**Senior Planning Officer, Special Activation Precincts**



[www.dpie.nsw.gov.au](http://www.dpie.nsw.gov.au)



*The Department of Planning, Industry and Environment acknowledges that it stands on Aboriginal land. We acknowledge the traditional custodians of the land and we show our respect for elders past, present and emerging through thoughtful and collaborative approaches to our work, seeking to demonstrate our ongoing commitment to providing places in which Aboriginal people are included socially, culturally and economically.*



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