

From: noreply@feedback.planningportal.nsw.gov.au on behalf of [Planning Portal - Department of Planning and Environment](#)
To: [DPE PS ePlanning Exhibitions Mailbox](#)
Subject: Webform submission from: Activation Precincts SEPP and the Wagga Wagga master plan
Date: Tuesday, 29 September 2020 5:19:25 PM
Attachments: [m-fromholtz-sap-support-sep-20_0.docx](#)

Submitted on Tue, 29/09/2020 - 17:16

Submitted by: Anonymous

Submitted values are:

Submission Type: I am making a personal submission

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Submission file:

[m-fromholtz-sap-support-sep-20_0.docx](#)

Submission: Submission for Wagga Wagga Special Activation Precinct from Michele Fromholtz. Generally in support of the WWSAP with some reservations.

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

I am writing to comment on the draft master plan for the Wagga Wagga Special Activation Precinct (WWSAP)

I generally offer my support for the proposal, but also with some reservations about the project. The reasons for support and reservations is provided below.

In support of the proposal

While I do not support development and growth as a necessary ideal, I accept that many others do, and my opinion would be of no interest to the proponents or approvers of this proposal.

The factors which encourage me to support the SAP are as follows.

- From the perspective of a resident on the Eastern side of the proposal, I am very pleased and relieved to see that land in our Eunony Valley, currently zoned industrial, will be backzoned and largely replaced by a rural activity zone (RAZ).
- I believe it is a sound decision to avoid any further development East of the Railway line (given the nature of the land beyond it, and the heavy burden of infrastructure costs).
- I appreciate that there is an overarching 'control' placed over the whole precinct which protects those in the Eastern Eunony Valley, from anything more than solar energy systems of 150 sqm per lot. Given electricity generating works are permissible in rural land, this is a beneficial 'overriding' factor for us assuming I have read the information correctly and this is the limit in the Eastern RAZ as indicated.
- I am positive about the fact that the development is proposed to occur, over time, in distinct stages rather than opening up the whole site to development immediately. This is a sound approach to help develop infrastructure and prepare residents in different areas for the likely stage of development.
- In principle, I respect many of the goals and principles of the WWSAP. I am especially committed to the environment including protection of water (surface and underground), flora and fauna and appropriate habitat. I also strongly support First Australian heritage and connection to country.
- I hope that surrounding residents may benefit from the aims of improved digital connectivity.
- It would be a relief have to read fewer development applications and submit responses (but as noted in the next section) this comes at a risk.
- I am hopeful that as neighbours, the path to enquire and complain about problems (such as noise, odours, runoff, glare etc) will be streamlined through Regional Growth NSW Development, rather than to have to negotiate a complex array of organisations.

Reservations about the proposal

- My perspective is from the Eastern side, but I am conscious that other nearby residents (in the North, West and South) may have very different perspectives and I hope and trust that their concerns are taken into account.

- The Rural Activity Zone is, in principle, a good thing. In practicality, it falls short of its likely aims. On the Eastern side, a great deal of the proposed RAZ is already taken up with a large scale solar facilities (one established, one imminent and one pending application). With such a footprint on the Eastern RAZ, the inferred benefit is much less than it promises.
- Thus, I am particularly concerned about plans for solar development in the west. It is hard to believe, or trust, that solar developments in the Western RAZ (even within the allowable size) would be any less invasive and detrimental to maintaining a rural buffer zone than it is in the EAST.
- I regard solar facilities as industrial, not rural. They are electricity generating works (industrial), currently allowable on rural land. That doesn't make them rural or agricultural activities. It is unsatisfactory to suggest that solar facilities in the Rural Activity Zone, will provide "a transition between the industrial core and the surrounding rural and residential uses, creating a landscaped setting" for the WWSAP. This 'Rural landscape buffer area' (as in Figure 7, p. 27 of the Draft Master Plan), will largely NOT be a rural landscape.
- It seems silly, and outside the principles of circular economy and green energy, to allow energy produced in the location, to be exported and then, to have to establish more facilities to provide the energy that has 'gone' elsewhere. While all this is notional in a shared grid scenario, it is the Draft Master Plan that is proposing the solar energy should be local. If national corporations such as Westpac and Coles, and the City of Sydney, can claim to be 100% (or nearly) renewable (from electricity produced *here*), why does Wagga Wagga have to actually produce the energy locally to make the same claim?
- I support many of the ideals and principles underpinning the SAP (as stated above). However, in practice I live in a community where *trust* in industrial development is very low due to past experience. In our experience, developers have been lax in meeting compliance conditions (such as planting required vegetation, avoiding runoff and emission of toxins). Authorities who should enforce the activities of industrial businesses have also been lax in enforcing compliance. This has left us with damaged and polluted sites, spillover of toxins and water, and a failure to establish and maintain screening or remediate sites. What would lead us to *trust* the enforcer and manager of this site?
- The Draft Master Plan refers constantly to aspects of the proposal that will be specified more fully and in more detail in the Delivery Plans. To some extent these refer also to all the Technical documents prepared for the proposal. Referring to the issue of *trust* again, this an alarm bell for doubt and mistrust. Any endorsement we give now is open to interpretation, interpolation or extrapolation of plans that lie beyond our control or comment. The same problem lies in the fact that fast-tracked planning and decision making by the authorised Regional Growth NSW Development Corporation leaves us having to trust that decisions are made in accord with the principles, and with all stakeholders in mind. I cannot help but believe that the driving force of 'economic development' and the money and preferences of developers will hold some sway in decisions that are made (even if the SAP principles are broadly adhered to).

What I'd like to see to enhance the proposal

We are nearing the completion of the exhibition process and approaching likely approval for the WWSAP. Aware of that, and realising that local neighbours will have little say, I can still offer suggestions, in support of my own comments. My support for the proposal would be more positive if the following could happen.

- Vegetation be planted now. It is futile to wait for industries to establish before requiring screening vegetation. We all know that trees and shrubs take years, even decades, to grow tall and thicken. The impact on surrounding businesses, and landholders could be reduced if action is taken immediately to establish perimeter plantings around all the Regional Enterprise Zone, and at other sites (within that Zone and the Rural Activity Zone). This might be especially achievable, given some indications are already made about where some of it is intended to be located.
- A commitment be made to harvest as much solar power as possible on the roofs of existing and new buildings rather than build new solar facilities in the Western RAZ (as proposed). Beyond existing contract periods, it would be good to see some arrangement with existing facilities for solar power rather than to have to expand the footprint.
- It is vital that there members of the community and other stakeholders, are assisted in expressing their concerns or making their inquiries about activity in the Precinct. Regional Growth NSW should be approachable, with a streamlined, transparent process that facilitates getting questions answered, problems solved, breaches of compliance resolved and so on.

Michele Fromholtz,
Resident,

