



5 September 2019

Ms Gina Metcalfe  
A/Director Central (Western)  
Greater Sydney, Place and Infrastructure  
Department of Planning, Industry and Environment  
GPO Box 39  
SYDNEY NSW 2001

Our Ref: 13/2018/PLP  
Your Ref: PP\_2018\_THILL\_002\_00

Dear Ms Carruthers

**Proposed The Hills LEP 2012 (Amendment #) - Amendments to Clause 4.1B exceptions to minimum lot sizes for certain residential development (13/2018/PLP)**

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I refer to the above planning proposal and the Gateway Determination that was issued on 31 July 2018. This letter seeks the Department of Planning, Industry and Environment's agreement to an amended public consultation process and an extension of time for the completion of the planning proposal.

Condition 3(c) of the Gateway Determination requires the following consultation to be undertaken as part of the public exhibition process:

*"3(c) Council is to write to all affected landowners about the exhibition of the proposal explaining how to make a submission, the proposed amendments and how they affect the future provision of small lot housing."*

Compliance with this condition would require a direct mail-out to over 11,000 property owners, many of which are unlikely to be materially impacted by the proposal. For example:

- While the proposal affects R4 High Density Residential zoned land, it is anticipated that take up of small lot housing development with these areas will be negligible given much of this area already accommodates existing apartment developments or is likely to facilitate residential flat building development with a substantially greater yield and return; and
- While the proposal affects R3 Medium Density Residential zoned land, significant areas of R3 zoned land are located within urban release areas and have been recently developed. It is considered that much of these areas, which accommodate modern housing stock, would be unlikely to turn over for small lot housing development.

Having regard to each of these factors, the necessity of writing directly to all land owners within the R3 Medium Density Residential and R4 High Density Residential zones is questioned.

As an alternative approach, the following revised consultation strategy is suggested, for the Department's consideration:

- A quarter-page advertisement in the Hills Shire Times and Rouse Hill Times newspapers at the commencement of the exhibition period;
- Advertisements in Council's Public Notices on two occasions during the exhibition period. The Public Notices page appears in the Hills Shire Times and Rouse Hill Times newspapers, is available on Council's website and features on Council's Facebook page;
- Social media advertising, via promoted Facebook and Instagram posts that are *targeted* to affected postcodes; and
- A dedicated page on Council's website with information about the planning proposal, how it will affect landowners and how they can lodge a submission.

It is considered that the abovementioned consultation approach would sufficiently promote awareness of the proposal and allow for landowners to review and make comment on the proposed planning changes. It would also represent a more effective and substantially more cost-efficient use of public funds.

Having regard to the above, it is requested that an amended Gateway Determination be issued which amends Conditions 3(c) to instead reflect the above consultation requirements. Following receipt by Council of the Department's approval, Council will proceed with public exhibition of the planning proposal.

It is also noted that the current Gateway Determination requires the LEP to be completed by 1 July 2019. It is requested that an extension of time to February 2020 be granted to allow Council to sufficient time to complete the planning proposal process.

Thank you for your consideration of these matters. Any future correspondence in relation to this matter should quote reference number 13/2018/PLP. Should you require further information, please contact Kayla Atkins, Senior Town Planner, on 9843 0404.

Yours faithfully



**Nicholas Carlton**  
**MANAGER - FORWARD PLANNING**