

Mr Stephen Kerr
Executive Director
Gyde Consulting
c/o stephenk@gyde.com.au

7 December 2022

Dear Mr Kerr,

PRE-LODGE MENT WRITTEN ADVICE – SCOPING PROPOSAL FOR NO 1838 BARKERS LODGE ROAD, 1455 & 1475 BURRAGORANG ROAD, OAKDALE

I refer to the pre-lodgement meeting held on 26 October 2022 to discuss a potential draft planning proposal to amend the *Wollondilly Local Environmental Plan 2011* to rezone land at the above address (Lot 1, 2 and 6 in DP 734561) to facilitate development of the site for low density housing and to protect environmentally sensitive land.

We appreciate the efforts to follow the process in the NSW Government's *Local Environmental Plan Making Guideline* (the Guideline). I would also like to apologise that the first stage of the new pre-lodgement process and preparation of the written advice has taken longer than we would have hoped.

The following documents are provided with this letter:

- Minutes of the pre-lodgement meeting held on 26 October 2022,
- Written Advice,
- Council's Planning Proposal Policy and Application form,
- A copy of advice provided by authorities/government agencies.

If you have any questions I can be contacted on (02) 4677 9551 or carolyn.whitten@wollondilly.nsw.gov.au.

Yours faithfully,



Carolyn Whitten

Strategic Planning Team Leader

Sustainable Growth

ATTACHMENT 1: Written Advice

The following written advice is provided in accordance with the NSW Government's *Local Environmental Plan Making Guideline* (the Guideline).

Scoping Proposal Information

Lot/DP	Lot 1, 2 and 6 in DP 734561
Address:	No 1838 Barkers Lodge Road, Oakdale No 1455 & 1475 Burragorang Road, Oakdale
Scoping Proposal	Prepared by Gyde Consulting on behalf of Morehuman Property Group dated 30 August 2022.
Proposed Amendments	<p>To facilitate the development of the site for low density housing and to protect environmentally sensitive land. It seeks to do this by:</p> <ul style="list-style-type: none">• Rezoning land from its current RU1 Primary Production zone to R2 Low Density Residential (approximately 19.1 hectares) and part C2 Environmental Conservation (approximately 3.4 hectares)• Amending the minimum lot size for subdivision by amending the Minimum Lot Size Map from 16ha to:<ul style="list-style-type: none">- 450 sq.m and 700sq.m for residential land, and- No minimum lot size for C2 Environmental Conservation land.• Amending the Height of Buildings Map to introduce a 9m maximum building height for residential land.• Inclusion of the site on the Urban Release Area Map
Anticipated Yield	Up to 160 lots
Supporting Documents	Nil
Pre-lodgement Meeting Date	26 October 2022

INTRODUCTORY NOTES

- The purpose of the pre-lodgement stage is to provide early feedback to proponents about the strategic and site-specific merits of a proposal.
- This written advice has been provided on the basis of the Scoping Proposal and any submitted supporting information, internal specialist feedback, authorities and government agencies feedback and the pre-lodgement meeting.
- This written advice is provided in good faith and the pre-lodgement process is not a full merit assessment of the proposal. Proponents should consider the advice in proceeding with and preparing a planning proposal. A comprehensive assessment of the draft planning proposal will be undertaken following lodgement of all the necessary information. Following the assessment, further issues may be identified for addressing.
- A proponent may still lodge a planning proposal with council, despite the advice provided as part of the pre-lodgement meeting or written advice.

1. Planning Proposal Category

On the basis of information provided to date, the proposal is likely to be classified as a 'Complex' planning proposal under the Guideline. Refer to Figure 1 for details:

Complex	<p>A complex planning proposal refers to any one or more of the following proposed LEP amendment types, including an amendment:</p> <ul style="list-style-type: none">• To change in the land use zone and/or the principal development standards of the LEP, which would result in a significant increase in demand for supporting local, regional or State infrastructure and would require infrastructure funding• To respond to a new policy e.g. local character or new provision not in the standard instrument template• That is inconsistent with a District/Regional Plan or council's endorsed LSPS• Responding to a change in circumstances, such as the investment in new infrastructure or changing demographic trends• That is progressed under the Aboriginal Land SEPP• Any other amendment or amendments that are not categorised as a principal LEP, standard or basic planning proposal
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Figure 1: Extract of Planning Proposal Category from the Guideline (page 14)

2. Planning Proposal Fees and Charges

On the basis of information provided to date, the proposal is considered to be a 'Complex/Principle' under Council's adopted *Planning Proposal Policy*.

The relevant fee under Council's adopted Fees and Charges for this type of planning proposal is currently \$119,616.48.

Payment of the following fees will also be applicable where relevant:

- Environmental Study Finalisation Fee; 10% of the cost of each required study (to be paid at a later date following the lodgement of the proposal),
- Study Peer Review (if applicable); Full cost recovery. This fee will be payable for any study that requires a peer review to be carried out.
- Planning Proposal Mapping fee; for the preparation of LEP comparison maps for public exhibition purposes;
- LEP Amendment Mapping Fee; for the preparation of final LEP Maps for the Gazettal of the planning proposal.

Council's Fees and Charges also set a fee for a DCP amendment initiated by a proponent. This fee would also apply should the Planning Proposal include any amendments to the Wollondilly Development Control Plan 2016.

Should the proposal require an amendment to Wollondilly Contributions Plan, an application to amend the plan, along with the commensurate fee should be lodged concurrent with the planning proposal.

Please note that the fees are based on Council's current adopted Fees and Charges for the 2022/2023 financial year and may change upon commencement of the new financial year. This could include any additional fees or charges introduced at that time.

3. Community & Stakeholder Engagement Requirements

The [Wollondilly Community Participation Plan](#) provides a clear process of how and when Council will engage with the community in relation to plan making processes across the Shire, including mandatory requirements for initial notification and public exhibition in relation to its planning functions.

If a proposal proceeds to Gateway, the Gateway Determination will outline the required engagement as part of the public exhibition process.

4. Preliminary Advice on whether the proposal has Strategic and Site-Specific Merit

In terms of the strategic planning framework, the proposal is considered;

- a. Inconsistent with the **Greater Sydney Region Plan** and the **Western City District Plan**;
 - principally due to the site's location within the Metropolitan Rural Area,
 - the scale of the proposal is not considered 'local growth',
 - nominated growth areas and existing residential zoned land are better suited for this type of proposal.
- b. Inconsistent with **Wollondilly 2040 Local Strategic Planning Statement**;
 - Inconsistent, particularly in relation to Planning Priority 1 (Aligning Infrastructure), Planning Priority 3 (Framework for Managed Growth), Planning Priority 5 (Housing), Planning Priority 13 (Protecting Biodiversity), Planning Priority 16 (Metropolitan Rural Area) and Planning Priority 18 (Climate Impacts & Resilience).
- c. Inconsistent with the **Wollondilly Rural Lands Strategy**;
 - The proposal would enable encroachment of urban or residential lands into rural areas outside of identified growth areas or existing village footprints and is not clearly identified for these uses in the Local Housing Strategy.
- d. Inconsistent with the **Wollondilly Local Housing Strategy (LHS)**;
 - Land in and around Oakdale has not been identified for urban development,
 - the scale of the proposal is not considered 'local growth',
 - Wollondilly has adequate land capacity to supply additional housing in line with demand,
 - However, consideration should be given to Council's resolution from 16 March 2021 on the LHS and the direction to facilitate consideration of appropriate new planning proposals that met certain criteria based on planning proposals that were previously supported by Council and had a Gateway determination to proceed.

It is not considered that the previous planning proposal at this location met the criteria outlined.

In any case, it is also considered that a new planning proposal for this site would not meet the requirements of the resolution as it would not be

consistent with the local strategic planning statement and would not meet the definition for local growth.

Access to Council [Agendas and Minutes](#) is available on Council's website.

e. **Inconsistent** with **Local Planning Directions**;

- Inconsistencies with Direction 1.1 (Implementation of Regional Plans), Direction 3.1 (Conservation Zones), Direction 4.3 (Planning for Bushfire Protection), Direction 6.1 (Residential Zones), Direction 9.1 (Rural Zones) and Direction 9.2 (Rural Lands).

Summary of Strategic Planning Merit of the Proposal

Based on an assessment of the scoping proposal, it is considered that the proposal is not consistent with the Strategic Planning framework and does not have strategic planning merit.

5. Recommended Changes to the Scope of the Proposal

Any future planning proposal should consider:

- the approach to areas proposed to be zoned C2 Environmental Conservation should be reviewed to minimise fragmentation and promote the ongoing management of environmentally sensitive land. For example, through appropriate zoning and appropriate minimum lot sizes.
- Inclusion of areas containing native vegetation on the Natural Resources – Biodiversity Map
- A C2 Zone adjacent to the east west southern boundary based on updated assessment consistent with previous advice and updated EHG advice is requested.

6. Recommended Investigations and Studies to Support and Justify the Proposal

A planning proposal for the site will need to be supported by the necessary studies at the time of submission.

It is noted that many of these considerations are interrelated and, therefore, a holistic view of the site constraints is required.

The following advice has been provided by Council's specialist officers based:

Issue	Comments
Aboriginal Cultural Heritage	An Aboriginal Cultural Heritage Assessment will be required. If the study prepared for the previous planning proposal is to be submitted then it will need to be updated to confirm the findings are still relevant.

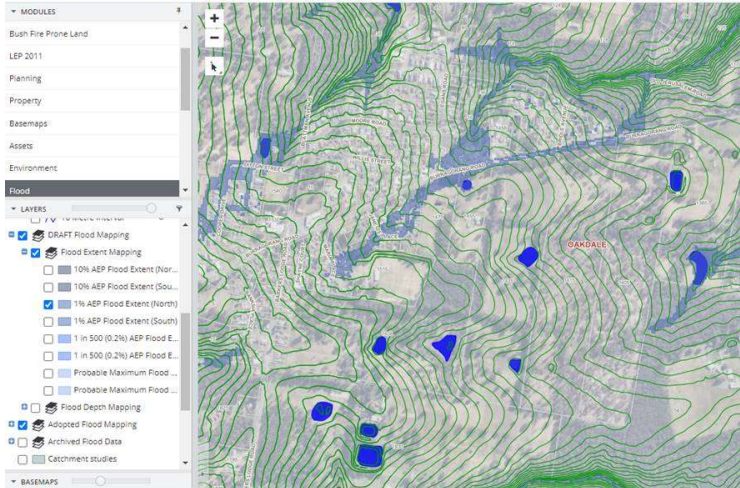
Issue	Comments
Non-Indigenous Heritage	A preliminary heritage impact statement will be required.
Bush Fire Hazard	<p>The site is identified as being bushfire prone.</p> <p>Any planning proposal is to be supported by a <u>Strategic Bush Fire Study</u> to be prepared in accordance with the NSW Rural Fire Service's Planning for Bushfire Protection 2019 and requirements provided by NSW RFS.</p>
Contamination	<p>A Preliminary Site Investigation (PSI) is required and must be prepared by a suitably qualified environmental consultant.</p> <p>If the PSI prepared for the previous planning proposal is to be submitted then it will need to be updated to include any potential changes to the site since its preparation.</p> <p>The PSI should be undertaken having regard to:</p> <ol style="list-style-type: none"> 1. NSW Environment Protection Authority (EPA 2020) Consultants Reporting on Contaminated Land - Contaminated Land Guidelines. 2. National Environmental Protection Council (NEPC 2013) National Environment Protection (Assessment of Site Contamination) Measure 199. 3. Resilience and Hazards SEPP Chapter 4 Remediation of Land.
Biodiversity	<p>Biodiversity values of the site</p> <ul style="list-style-type: none"> • Part of the site has been mapped as Critically Endangered Ecological Community Sydney Shale/Sandstone Transition Forest (SSTF). However, based on previous review of the site as part of the previous planning proposal, a more extensive occurrence of this community has been identified. The presence of Cumberland Plain Woodland on the more elevated part of the site has also been identified. • No threatened species have been recorded within the vicinity of the site however targeted surveys may identify threatened flora and/or threatened fauna species. • The proposal will need to comply with the Biodiversity Conservation Act • Consideration of site design and avoidance measures associated with the BAM needs to be considered at the planning proposal stage.

Issue	Comments
	<ul style="list-style-type: none"> • The planning proposal needs to adequately identify biodiversity constraints and provide for suitable outcomes consistent with the Act, recent court findings as well as containing consideration of Council's draft Sustainability Policy. • Significant shortcomings were raised in the Flora and Fauna assessment submitted with the previous version of the planning proposal. • A BDAR or pursuit of biocertification is a matter for the applicant <p>Implications of the Cumberland Plain Conservation Plan</p> <ul style="list-style-type: none"> • No implications of this Plan have been identified for the site <p>Implications of the Biodiversity Offset Scheme</p> <ul style="list-style-type: none"> • The Biodiversity Values Map (BV Map), developed under the <i>Biodiversity Conservation Act 2016</i>, applies to significant parts of the site. Any clearance of native vegetation on land covered by the BV Map will trigger the need for a Biodiversity Development Report that accompanies any development application. Any Asset Protection Zone on land covered by this Map will also trigger the need for a BDAR. • The native vegetation clearance threshold triggering a BDAR based on the minimum lot size of 16 ha is 0.5 hectare. <p>Implications of the State Environmental Planning Policy (Koala Habitat Protection) 2021</p> <ul style="list-style-type: none"> • It is likely that Council's draft Comprehensive Koala Plan of Management will be in at least a draft stage at the time of lodgement of submission of a planning proposal and consequently require consideration. The current preliminary draft Plan requires <u>koala corridors based on current scientific research</u>. The submitted proposal needs to contain demonstrated consistency with such research. <p>Comments on Submitted Layout</p> <p>The following concerns with the submitted layout are noted:</p>

Issue	Comments
	<ul style="list-style-type: none"> • No provision of building envelopes with Asset Protection Zones • Does not address the avoidance and mitigation impacts to Critical Endangered Ecological Communities in accordance with the Biodiversity Assessment Methodology, recent Land and Environment Court findings and Council's draft Sustainability Policy • Does not recognise the presence of Critical Endangered Ecological Communities based on scientific determinations. • Does not provide any Conservation Mechanisms for these Ecological Communities of higher value. • Does not provide for achievement of a 40 percent canopy target and address urban heat implications. • Will likely result in a high level of edge effects to the central bushland resulting in deterioration in condition without high and regular maintenance. <p>Recommended amendments consistent with previous comments from Environmental Services are:</p> <ul style="list-style-type: none"> • The lot layout and sizes require amendment to allow for retention of areas of high biodiversity value and achieve mitigation of the impacts of clearance of vegetation on the site. Note, mitigation could include enhancement of C2 bushland area. • A C2 Zone adjacent to the east west southern boundary based on updated assessment consistent with previous advice and updated EHG advice is requested. • The extension of the turning circle to the C2 boundary needs to be amended to provide for a suitable buffer to reduce direct edge effects within the bushland. • The south west corner needs to be adjusted to provide larger lots (possibly C3 Zone) that would protect the Cumberland Plain Woodland identified in this part of the site by Council's Environment Officers • The extension of the turning circle to the C2 boundary needs to be amended to provide for a suitable buffer to reduce direct edge effects within the bushland. <p>Study Requirements</p> <ul style="list-style-type: none"> • A Flora and Fauna Assessment is required that contains (as a minimum): <ul style="list-style-type: none"> ○ Demonstrated consistency with the applicable legislative framework as well as Council policy framework including Council's draft Sustainability Policy 2030.

Issue	Comments
	<ul style="list-style-type: none"> ○ Mapping of vegetation communities based on current definitions and guidelines including Scientific Determinations for Critical Endangered Ecological Communities. ○ Targeted surveys for threatened flora and fauna species identified within a 10 Kilometre radius of the site that must include koalas and Cumberland Plain Conservation Plan. ○ Identification of habitat corridors within the site and in a landscape context including for koalas. ○ Identification of habitat value the site currently provides including stepping stones for habitat ○ a biodiversity constraints map showing areas of identified biodiversity of different levels based on ecological considerations. ○ A consideration as to whether the development (as proposed) will present Serious and Irreversible Impact. <p>Note: Council has developed a framework with other councils in western Sydney that requires mitigation of impacts on site. In addition, there has been recent court cases that identified the removal of Critical Endangered Ecological Communities could be considered to represent Serious and Irreversible Impact.</p> <ul style="list-style-type: none"> ● An integrated layout with detailed justification for its components prepared by suitably qualified person that: <ul style="list-style-type: none"> ○ Avoids impacts to areas of mapped Critical Endangered Ecological Communities and also to remnant mature trees unless demonstration is provided such impact is unavoidable. ○ Is based on best practice and current research regarding green urban design ○ Allows for retention of habitat corridors identified from the Flora and Fauna Assessment that are consistent in terms of features and width with up to date scientific research. ○ Provides positive biodiversity, liveability, aesthetics and canopy outcomes as well as urban heat implications of the development. ○ An analysis that would demonstrate achievement of a forty percent canopy target that does not rely on street trees. ○ Provides location of building envelopes (with any associated required Asset Protection Zones) that

Issue	Comments
	<p>would avoid impact to identified areas of high biodiversity value.</p> <p>Management of C2 zoned land</p> <ul style="list-style-type: none"> • The planning proposal will need to demonstrate how the ongoing management of any C2 zoned land will be achieved. • Any dedication of land to Council would be considered in line with Council's Land Dedication Policy. However, it is unlikely that Council would accept the land. • The applicant needs to investigate either seeking a Biodiversity Stewardship Agreement for the site or adjusting to burden a lot with the land <p>Design Principles</p> <p>Any planning proposal should demonstrate consistency with the following design principles:</p> <ul style="list-style-type: none"> • Prevent fragmentation of conservation land through a minimum lot size which does not allow further subdivision (other than to subdivide off conservation land from development land). • Prevent impacts from development on conservation land by: ensure active open space is provided within the development land. • Provide buffers to conservation land within the development via a perimeter road, shared cycle/pedestrian paths or open space. • Ensure stormwater and effluent systems do not discharge into existing or proposed conservation land. • Ensure APZs sited on development land • Retention of existing vegetation within development land for amenity and urban cooling.
Flood Hazard	<p>Council is currently finalising a Shire Wide Flood Study.</p> <p>Flooding has been identified in the existing urban area that will have a bearing on this proposal as it is downstream from the site:</p>

Issue	Comments
	<div data-bbox="635 226 1378 712">  </div> <p>The western portion of the site drains through the residential area south of Burragorang Road where issues have been experienced as well as the flooding identified.</p> <p>There is some scope to drain that area east rather than north and that should be investigated. However, it will also transfer water into another catchment that will need to be assessed.</p> <p>The northern portion drains towards Burragorang Road where a pipe system carries water under the road and to the north. There are existing issues with capacity (flooding) and termination erosion associated with private land.</p> <p>A 1% AEP capacity crossing of Burragorang Road in the frontage of the site will be a desirable outcome but will require some associated downstream works.</p> <p>A flood impact and risk assessment will be required to inform any future planning proposal on the site.</p>
Water Quality	<p>Council's Integrated Water Management Strategy should be applied together with Water NSW's NORBE assessment tool.</p> <p>Any planning proposal should be supported by an Integrated Water Management Plan that:</p> <ul style="list-style-type: none"> • Demonstrates consistency with the no adverse impact to watercourses outcome of Council's Integrated Water Management Strategy as well as its requirement there be no difference in volumes pre and post DA.

Issue	Comments
	<ul style="list-style-type: none"> • Demonstrates consistency with the NSW Government's Risk Management Framework. • Includes a stormwater management strategy, • Is supported by an integrated layout that involves recycling of water wherever achievable and utilises internal blue grid.
Health Planning	<p>Council has a Social and Health Impact Assessment (SaHIA) Policy in place, and the associated Guidelines specify that a project of this scale will require a Comprehensive Social and Health Impact Report (CSHIR).</p> <p>The Policy and Guidelines can be found at on Council's About Health in Planning webpage and provide instructions on how to prepare the Comprehensive Report.</p>
Local Contributions	<p>Development Contributions</p> <p>The proposal is additional development to that expected in the Wollondilly Contributions 2020 (the WCP 2020), as such the Planning Proposal is to identify infrastructure needs and propose the form of infrastructure funding and mechanism needed to support the proposal. This is either and Amendment of WCP 2020 or a Planning Agreement (VPA).</p> <p>A Draft CP or Draft VPA will need to be progressed to ensure that exhibited at the same time as the Planning Proposal. This will cover open space and recreations, roads, intersections and active transport, community facilities and plan/ VPA administration, management and reporting.</p> <p>Dedication of Land to Council</p> <p>CP2020 does not include Infrastructure Land such as stormwater facilities, easements, asset protection zones or environmental / conservation land. If any land is proposed to be dedicated to Council, that can only occur through a Voluntary Planning Agreement. In additional, Council does require any Biobanking Agreement, Stewardship Funding Agreement or the like, to the executed prior to entering in to the VPA, that that environmental rehabilitation works (required by that agreement) has occurred prior to the land being dedicated to Council.</p>

Issue	Comments
	<p>As per Dedication of Land Policy, all land must be dedicated to Council at no cost to Council, be fit for purpose and embellished up to a standard in accordance with Council approval. In addition, a minimum of 35 years maintenance must be provided, with the developer maintaining from years 1 to 5 and providing maintenance contributions for years 6 to 35. No offset against development contributions will be considered.</p> <p>Maintenance Contributions If dedication is proposed, minimum of 35 years maintenance must be provided, with the developer maintaining from years 1 to 5 and providing maintenance contributions for years 6 to 35. No offset against development contributions will be considered.</p> <p>Delivery Timing of Development If dedication is proposed, minimum of 35 years maintenance must be provided, with the developer maintaining from years 1 to 5 and providing maintenance contributions for years 6 to 35. No offset against development contributions will be considered.</p> <p>Submission Requirements The following documents provide information</p> <ul style="list-style-type: none"> • Infrastructure Delivery Plan Template; which details contents to be addressed on a Planning Proposal, and • Infrastructure Delivery Schedule Template; which will be required as part of any VPA.
Strategic Planning Framework	<p>Outcome of former planning proposal for Land Adjoining Oakdale Sportsfields (PP_2013_WOLLY_006_00) On 21 December 2020 a planning proposal in the same location as this proposal was refused by the NSW Government as part of the Planning System Acceleration Program (Legacy Planning Proposals).</p> <p>While the Scoping Proposal acknowledges a number of fundamental steps that were identified in the decision, that need to be addressed before a new planning proposal could be considered, it has not addressed the outstanding matters identified for the site which include:</p> <ul style="list-style-type: none"> • Potential impacts on Shale Sandstone Transition Forrest,

Issue	Comments
	<ul style="list-style-type: none"> • Inconsistencies with regional, district and local strategic planning frameworks now in place for Wollondilly, and • Inconsistencies and unresolved matters with 9.1 Directions 2.1 Environmental Protection Zones and 4.4 Planning for Bushfire Protection. <p>Note: As part of the NSW Government's suite of reforms to deliver a better planning system for NSW, the directions were realigned in early 2022 and the direction numbers are likely to have changed.</p> <p>Strategic Planning Framework Any planning proposal will need to address the relevant strategic planning documents including but not limited to:</p> <ul style="list-style-type: none"> • A Metropolis of Three Cities • Western City District Plan • Wollondilly 2040 (Local Strategic Planning Statement) • Wollondilly Local Housing Strategy • Urban Tree Canopy Plan and Landscape Strategy • Wollondilly Rural Lands Strategy • Draft Wollondilly Scenic and Cultural Landscape Strategy <p>Greater Sydney Region Plan/ Western City District Plan The Scoping Proposal provides a high-level assessment of the planning proposal against the Region and District Plan and has not addressed some key matters of relevance such as:</p> <ul style="list-style-type: none"> • Planning Priority W5, <i>Providing housing supply, choice and affordability, with access to jobs, services and public transport</i>, and the need of new housing to be in the right locations; growth areas, planned precincts, urban renewal and local infill development. • Planning Priority W17, <i>Better managing rural areas</i>, which directs future housing needs to be provided within the urban areas. Areas within the Metropolitan Rural Area (MRA) are not intended to play a role in meeting regional or district scale demand for residential growth. • Demonstration that the proposed amendments would deliver targeted environmental, social or economic outcomes for the MRA <p>Wollondilly 2040 Local Strategic Planning Statement</p>

Issue	Comments
	<p>The Scoping Proposal has not addressed some key matters of relevance such as:</p> <ul style="list-style-type: none"> • Planning Priority 16, <i>Enhancing and protecting the diverse values of the Metropolitan Rural Area</i>; further fragmentation of rural land is generally not supported unless it is identified in the Local Housing Strategy or Rural Lands Strategy. • Planning Priority 18, <i>Living with climate impacts and contributing to the broader resilience of Greater Sydney</i>; Council's investigation into natural and manmade hazards is required before consideration of planning proposals for local growth. <p>Wollondilly Local Housing Strategy (LHS)</p> <p>The Scoping Proposal has not addressed some key matters of relevance such as:</p> <ul style="list-style-type: none"> • a key finding of the strategy is that Wollondilly has adequate land capacity to supply additional housing in line with demand up to 2041. • In terms of local growth, there is adequate capacity for further housing development through local growth in current residential zoned land. • Oakdale is a location identified as having limited wastewater network capacity to accommodate growth. • There is no genuine discussion of local growth and the LHS findings and that a need has not been identified for additional housing at this time. It is also noted that Wollondilly is on track to meet its housing targets in the District Plan. • Planning proposals for new housing development should consider: <ul style="list-style-type: none"> - Wollondilly Local Housing Strategy - Council resolution 33/2021 from 16 March 2021 and the adoption of the LHS. In particular, the direction to consider appropriate new planning proposals for sites that meet certain criteria which may be applicable to this proposal, - The Department's Letter of Approval and Advisory Notes dated 9 September 2021 for the LHS, and <p>Wollondilly Rural Lands Strategy</p> <ul style="list-style-type: none"> • Any planning proposal should be supported by an agricultural land capability study which should include a Land Use Conflict Risk Assessment and

Issue	Comments
	<p>consider the relevant Ministerial Directions relating to rural land.</p> <ul style="list-style-type: none"> The Rural Lands Strategy does not support rezoning land outside of existing villages for residential purposes.
Traffic and Access	<p>A Traffic and Transport Study must be included with any Draft Planning Proposal. In particular the Traffic and Transport Study should determine the capacity of the existing road network and intersections to cater for the development.</p>
Facilities and Recreation	<ul style="list-style-type: none"> The proposed development will have an impact on the existing open space and sportsground – Willis Park. Consideration will need to be given to the level of the impact on the increased demand on Willis Park and the Oakdale community Hall and how this is best accommodated. The area of densely vegetated land that is proposed to be dedicated to Council as an ‘augmentation of Willis Park’ is unlikely to provide any significant recreational benefit due to the management requirements associated with the SSTF and EEC. It is likely that this land will be used as a thoroughfare to Willis Park and will result in the need to manage a number of land use conflicts including, weed management, bushfire hazard liabilities, illegal trail biking, etc. Perimeter control would need to be installed upfront.
Development Capability	<p>Given the number of constraints to development on the site, a plan is required that overlays the various constraints to demonstrate how these interact and demonstrate how development, facilitated by the proposal, could be achieved.</p>

b) Submission requirements

Planning proposals are now required to be submitted online through the NSW Planning Portal.

We respectfully request that, if or when, you choose to lodge an application, please contact the Growth Team on 4677 1100 or growth@wollondilly.nsw.gov.au to confirm receipt at our end.

In addition to the required information identified above, the following information/supporting reports would need to be provided to inform the Planning Proposal including any relevant reports identified in Appendix C (*Supporting Technical Information*) of the LEP Making Guidelines for a Complex proposal:

- Completed Planning Proposal Application Form (ensure all signatures and authorisations are provided),
- A draft Planning Proposal document prepared in accordance with Section 2 of the Guideline (also to be provided in editable word document format);
- A completed Disclosure of Political Donations and Gifts form by the applicant, landowner and including those key consultants assisting in the planning proposal preparation,
- Assessment of all matters discussed outlined in the above sections. In summary the fundamental inconsistencies with the strategic planning framework of the District Plan, Wollondilly 2040, Wollondilly Local Housing Strategy, and Wollondilly Rural Lands Strategy.
- Information to address relevant SEPPs, Ministerial Directions, Planning Circulars and the like,

If studies prepared to inform the previous planning proposal are to be used to inform any future planning proposal these should be updated or include an addendum to confirm that the findings are still relevant in light of any updated legislation, best practice or updates frameworks.

7. Authority & Government Agency Comments

Feedback has been received from the following authorities and government agencies and is provided with this advice:

- Department of Planning and Environment
- Department of Primary Industries – Agriculture
- Environment and Heritage Group
- Sydney Water
- Water NSW

The following authorities and government agencies were invited but have not provided feedback to date:

- NSW Rural Fire Service