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6 October 2020

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Dear Mr Taylor

### LEP Review Program – Draft Strategies

The Property Council of Australia welcomes the opportunity to provide comments to Wollondilly Shire Council (the Council) on several of the following package of draft strategies released for consultation:

- Draft Wollondilly Local Housing Strategy,
- Housing Affordability Short Paper
- Draft Wollondilly Centres Strategy, and
- Draft Employment Land Strategy..

Note: This submission has not considered the content of the other draft strategies also released for public feedback (ie the draft Rural Lands Strategy, draft Scenic and Cultural Lands Study or draft Urban Tree Canopy Plan and Landscape Strategy).

As Australia's peak representative of the property and construction industry, the Property Council's members include investors, owners, managers and developers of property across all asset classes, including residential, industrial and office developments.

We are pleased to provide the attached comments for your consideration. We acknowledge Council has completed this strategic planning work to meet its obligations to the State Government and to fulfil actions contained within its Local Strategic Planning Statement that was finalised earlier this year. The Property Council is also aware that Council's participation in the Western Sydney City Deal has also required these strategic planning investigations to be completed.

We generally support the directions and actions contained within these draft strategies and look forward to Council implementing each strategy following the granting of any necessary endorsement by the Department of Planning, Industry and Environment.

Should you have any questions regarding the content of this submission please contact Troy Loveday, NSW Policy Manager, on 0414 265 152 or [tloveday@propertycouncil.com.au](mailto:tloveday@propertycouncil.com.au)

Yours sincerely

A handwritten signature in black ink, appearing to read 'Belinda Ngo', with a stylized, cursive script.

**Belinda Ngo**  
**Acting NSW Executive Director**  
**Property Council of Australia**

# **Submission to Wollondilly Shire Council**

## **LEP Review Program: Draft Strategies**

**6 October 2020**

## 1.0 Draft Local Housing Strategy

### 1.1 General Comments

Council has prepared a draft Local Housing Strategy (the Strategy) that provides a 20 year vision for housing within the Wollondilly Shire LGA. The Property Council is generally supportive of Council's vision laid out within the Strategy and it will build upon the previous actions implemented by Council and the State Government to provide a pipeline of new housing to meet current and future population growth and demand for housing.

We acknowledge that Wollondilly Shire Council has prepared this draft Strategy as a requirement of both the Greater Sydney Regional Plan (Action 3) and the Western City District Plan (Action 17). We support the Council undertaking this work at this time ahead of its deadline to update its local environmental plan to align with the Western City District Plan.

In 2018, the Department of Planning, Industry and Environment (DPIE) issued the publication "Local Housing Strategy Guideline" to all local councils which provided a step by step process for councils developing local housing strategies. We note that Council has prepared its draft Local Housing Strategy to be consistent with DPIE's guideline.

### 1.2 Housing Targets

The Property Council and our members have taken the opportunity to review many draft Local Housing Strategies that have been released for consultation. We applaud Council's efforts to undertake more strategic planning work to deliver greater diversity of housing, especially for seniors and smaller households and strategies to improve housing affordability.

Together the draft Local Housing Strategy and Council's Local Strategic Planning Statement (LSPS) should identify how medium and long-term housing targets will be achieved. It is understood the Greater Sydney Commission identified a 6 to 10-year housing target (for the period between 2021/22 and 2025/26) of between 1,800 and 2,300 dwellings during the LSPS assistance process. We support Council accepting this role to identify its own target within this range based on local supply factors.

Council's draft Strategy indicates:

- Annual population increase of 1.7% for last 10 years
- 5.8% annual population increase by 2036
- 99,600 residents by 2041 (almost 50,000 additional).
- Increase in older persons over 75 years of age and children under 19 years.
- Average household size is stable at 3.0 persons.
- Home ownership rate is high with 48% homes with mortgages.
- Housing stress for very-low and low income households is high.
- Separate or detached houses account for 93% of Wollondilly's housing stock.
- Only 5% of housing stock is medium density.
- Additional 15,661 dwellings by 2041.

We support Council undertaking further work to implement this Strategy once it has been endorsed by DPIE. In particular, careful consideration should be given to providing a supply of suitable dwellings that meet the needs of seniors, singles, couples and for other demographic groups identified in the Strategy with unmet housing needs.

### 1.3 Importance of the property industry

The importance of a strong property industry across Wollondilly LGA cannot be overstated. Policies conducive to growth and investment will support the thousands of jobs and businesses that are directly linked to property in Wollondilly. For example, construction was the number one industry for employment for Wollondilly residents in 2016, employing 14.8% of residents. It was also the number one for industry of business located in Wollondilly at 13.3%.

The Property Council welcomes the fact that these numbers are included in the Wollondilly Local Housing Strategy. For convenience, we have included below:

Top 5 Industries of Employment for Wollondilly LGA Residents (2016)		Top 5 Industries of Employment Located in Wollondilly LGA (2016)	
Construction	14.8%	Construction	13.3%
Health Care and Social Assistance	9.9%	Mining	12.8%
Retail	9.4%	Education and Training	8.3%
Education and Training	9%	Manufacturing	8.2%
Manufacturing	8.1%	Retail	7.5%

Source: .id

### 1.4 Affordable Housing Paper

Council has prepared an “*Affordable Housing Short Paper*” (the Paper) that is intended to be read alongside the Draft Local Housing Strategy. It has provided a brief analysis on affordable housing demand and supply in Wollondilly, including consideration of key indicators for affordability. It also suggests the introduction of inclusionary zoning policies for new development in growth areas is the most effective mechanism for delivering additional social and sub-market housing in Wollondilly. Directions 2 and 3 of the Strategy provide recommendations that address the LGA’s perceived need for more affordable housing to be supplied. The Property Council recommends Council avoid the use of an inclusionary zoning mechanism as a policy response to the housing affordability issue.

We note the Greater Sydney Commission Western City District Plan provides an affordable housing target of between 5 and 10%. Action 18 of the Western City District Plan requires Councils to prepare “Affordable Rental Housing Target Schemes” following development of implementation arrangements. The District Plan is silent regarding the implementation method used to achieve this target. We suggest Council should consider an approach that provides an incentive for the development industry to meet these targets voluntarily.

Some councils have commenced preparing contribution schemes for affordable housing following the amendment of *State Environmental Planning Policy No 70- Affordable Housing (Revised Schemes)* in early 2019. However, inclusionary zoning adds to the cost of housing generally. These costs can have a significant impact on the financial viability of development projects and put the housing supply pipeline at risk.

In February 2019, DPIE released guidelines for preparing affordable housing contribution schemes including details of the required viability assessment. It is important that Council have regard to these guidelines, including the viability assessment tool, as part of any scheme under consideration by Council.

### 1.5 Priorities for Housing & Actions

The following table considers each of the four (4) directions and the associated actions proposed to give effect to them and provides our response to these directions.

Local Housing Strategy Directions and Actions	Property Council Response
<p><b><u>Direction 1 – Provide housing in areas that are adequately serviced by infrastructure</u></b></p> <p><u>Actions:</u></p> <ul style="list-style-type: none"> <li>1.1 Encourage and prioritise development within existing residential zoned land in Tahmoor, Thirlmere and Picton that are already serviced by infrastructure and supported by public transport services.</li> <li>1.2 Prepare an update to the Wollondilly Social Planning Strategy to identify social and community infrastructure needs to support growth (funding and resources permitting).</li> <li>1.3 Continue to work with the DPIE and other State Government agencies to ensure that infrastructure servicing commitments and delivery staging plans are in place before land is rezoned for housing.</li> <li>1.4 Continue to work with Councils in the Western City District on the planning of regional infrastructure to ensure new land supply is co-ordinated with infrastructure development and site servicing.</li> <li>1.5 Continue to work with utility providers, particularly Sydney Water, to co-ordinate growth servicing plans in line with forecasted housing growth.</li> <li>1.6 Establish and maintain a local housing monitor to track and report on delivery of housing which can inform infrastructure planning.</li> </ul>	<p>We support 1.1 as it is a sensible and practical step that will achieve more productive use of land, and capital. It will also allow for more housing stock to be delivered and reduce upward pressure on house prices. In so doing aligns with <i>State Environmental Planning Policy (Affordable Rental Housing) 2009</i> and <i>State Environmental Planning Policy No. 70 Affordable Housing (Revised Schemes)</i></p> <p>Action 1.2 is supported and welcomed by the Property Council.</p> <p>The Property Council further welcomes actions 1.3-1.6. It is critical that the focus on delivering a steady supply of land and housing is continued.</p> <p>This is a positive and welcome direction, and we look forward to being involved in future implementation.</p>

**Direction 2 – Promote housing diversity and affordability**

**Actions:**

- 2.1 Identify opportunities for additional housing development as part of future town centre master-planning. Opportunities need to consider local environmental conditions and flooding and fire risks and potential to encourage a mix of smaller dwellings within town centres, subject to a study to understand the barriers to housing development on R3 Medium Density zoned land.
- 2.2 Ensure a review of the *Wollondilly DCP 2016* is concurrently undertaken with any development of future masterplans.
- 2.3 Protect current social and sub-market housing stock in the LGA to remain as affordable housing.
- 2.4 Support and facilitate the renewal of social housing dwellings in coordination with NSW Land and Housing Corporation and Community Housing Providers when required.
- 2.5 Liaise regularly with neighbouring councils to understand market demand and changes and a district view of housing affordability challenges.
- 2.6 Establish and maintain a local housing monitor to track and report on delivery of housing which can inform the success of Council planning and policy changes to promote housing diversity and affordability.

The Property Council supports Direction 2, which involves Council working towards greater housing diversity and affordability. These are important concepts that we agree are needed in Wollondilly LGA.

Action 2.1 is fully supported and we look forward to Council progressing the detailed master-planning work to identify the opportunities for additional housing within town centres.

Additional housing supply at Wilton New Town (approximately 15,000 new homes) and at Appin within the Greater Macarthur (approximately 20,000 new homes) for a total of 35,000 new dwellings is critical to supporting future demand and will help lessen pressure on prices.

We understand Council's desire to protect existing social and sub-market housing stock within the LGA that is described in Action 2.3. Council should indicate how it intends to implement this action, particularly in respect of private rental housing.



<p><b><u>Direction 3 – Plan and coordinate growth for emerging communities</u></b></p> <p><b><u>Actions:</u></b></p> <p>3.1 Continue to work with DPIE to develop development and infrastructure staging and sequencing plans.</p> <p>3.2 Continue to encourage a mix of smaller and larger dwellings that meet a range of small and larger sized households and affordability ranges.</p> <p>3.3 Continue to design neighbourhoods so that housing is accessible to sustainable transport options, open space, community services and facilities, retail and job opportunities.</p> <p>3.4 Continue to collaborate with DPIE to finalise the draft <i>Wilton DCP 2019</i>.</p> <p>3.5 Advocate to introduce inclusionary zoning where feasible.</p> <p>3.6 Continue working as an active partner with DPIE to plan for the Wilton and Greater Macarthur Growth Areas.</p> <p>3.7 Engage with the community to understand housing preferences, affordable living challenges, and the level of satisfaction living in Wollondilly. This can be incorporated as part of Council's current bi-annual survey of residents.</p> <p>3.8 Establish and maintain a local housing monitor to track and report on delivery of housing which can inform approaches to future planning and policies for Growth Areas.</p>	<p>The Property Council generally supports the actions listed to implement Direction 3.</p> <p>Identification of Wilton and Greater Macarthur Growth Areas as new locations for housing in the Local Housing Strategy is supported and actions 3.1 to 3.4 and 3.6 will facilitate this Direction being met.</p> <p>In respect to Action 3.5, we have made specific comment on the implementation of an inclusionary zoning scheme in Section 1.4.</p> <p>We support Council undertaking Actions 3.7 and 3.8 which will assist it to build up its evidence base on housing supply and demand within the LGA.</p>
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**Direction 4 – Build sustainable communities that protect and celebrate our environment**

**Actions:**

- 4.1: Develop local character statements for each town and village and update the *Wollondilly DCP 2016* to require new housing to be consistent with local character.
- 4.2: Monitor sustainability performance of existing residential and growth areas collecting base line data, that will inform future Council policy and design requirements. This could be done in collaboration with DPIE.
- 4.3 Work with DPIE to integrate a focus on sustainable communities in the future planning of Wilton and the Greater Macarthur Growth Areas.
- 4.4 Collaborate with DPIE to define requirements for a sustainable neighbourhood and housing the Wilton Growth Area.
- 4.5 Review the *Wollondilly Bushfire Management Plan* (2016) to inform updates to bushfire management planning and identify high risk areas which may shape where additional housing is appropriate, or design requirements are needed.
- 4.6 Amend the *Wollondilly DCP 2016* landscaping requirements for new housing to align with the Urban Tree Canopy Study (currently being undertaken).
- 4.7 Review and update the *Wollondilly DCP 2016* to ensure greater certainty of sustainable and environmental performance outcomes for new developments, and reflect outcomes from updates to bushfire management planning in *Wollondilly*.
- 4.8 Expand on existing Council “Environment and Sustainability” initiative to promote sustainable housing design and resilience. This could include community outreach programs, providing guidance on sustainable renovations, integrating ‘smart technology’ and improving the sustainability of people’s homes.

The Property Council generally supports the actions that have been identified to implement Direction 4.

We generally support Action 4.1 as it will ensure that new development, where it is permissible, will respond to and contribute towards the existing local character of a village or town. We would oppose local character statements being used solely to oppose any new development.

In respect of Actions 4.2 to 4.4, we would recommend Council also consider the recent research released by the Property Council and Green Building Council, *Every Building Counts*. Details of this research can be found at:

<https://www.everybuildingcounts.com.au/>

Given the recent NSW Bushfire season, it is important that Council review and update its Bushfire Management Plan to identify high risk areas. Council would also be aware that there have been recent changes to the RFS guideline, *Planning for Bushfire Protection*, that must be considered.

Changes to Council’s Development Control Plan (*Wollondilly DCP 2016*) intended to give effect to this Direction are generally supported, however any changes proposed should consider impacts on housing affordability generally and they should not be inconsistent with State Government policies such as the provisions of the Sydney Region Growth Centres SEPP and the BASIX SEPP.

## 2.0 Draft Wollondilly Centres Strategy

### 2.1 General Comments

The Property Council welcomes the opportunity to provide comments to Council on the draft Wollondilly Centres Strategy (the Strategy). Given the large geographic area of Wollondilly Shire and physical separation of its existing population centres by large areas of natural bushland, watercourses and major roads, it is important to identify a clear hierarchy of centres to develop plans to manage growth and change. We generally support the initiatives proposed in this Strategy.

As stated in the Strategy, this document forms part 3 of a set of documents that comprise the *Wollondilly Centres Study*. Its purpose is to inform and guide strategic planning decisions for the LGA over the next 20 years to 2041.

Centres are important as they provide places for residents to work, shop and carry out other business close to home. The role of centres and their functions are important from a strategic planning perspective. Planning for the development and growth of centres informs business investment decisions.

Council has prepared a draft Centres Strategy that provides the key principles for Centres and confirms the Priority Centres within the LGA, being Centres where resources, further studies and works should be focused during the short-term.

We welcome the focus on opportunities for Centre improvements to deliver benefits for their residents and visitors and support the recommendations contained in the draft Centres Strategy. However, it is not clear from the draft Strategy why there is no analysis of retail uses and opportunities for retail and commercial expansion to meet the needs of existing and future residents. The population growth being experienced in the next 20 years would certainly require some consideration of retail land uses and growth within the LGA's local centres. We would recommend further consideration be given to retail land uses and growth in the final strategy.

### 2.2 Hierarchy of Centres

Table 1-1 of the draft Centres Strategy identifies 34 centres, of differing size and scale, across the Wollondilly LGA.

The draft Centres Strategy classifies each of the centres into one of 3 typologies:

- **town centres** - in respect to Wollondilly Shire LGA, a town centre is a distinctly urban and intensive environment with a diverse mix of land uses and a focal point of activity for local residents and residents from the broader areas and regular visitors. Examples of Wollondilly's town centres include Picton and Tahmoor.
- **villages** – in Wollondilly Shire LGA a village is described as settlement with a smaller development footprint, with the centre likely to have a cluster of commercial premises and other activities used primarily by locals and the occasional visitor. Examples of a village are Bargo and Appin.
- **hamlets** – for the Wollondilly Shire LGA, a hamlet includes a small settlement in a rural or bushland setting, which is unlikely to expand its development footprint. Functions of a hamlet may include a small cluster of commercial premises or single neighbourhood shops. Examples include Douglas Park and Menangle.

### 2.3 Capacity for Growth within the Main Centres and Place Plan Preparation

The main centres within Wollondilly Shire are listed in section 4 of the draft Centres Strategy including their typology, a brief description of its current function/role, and capacity for growth. The draft Centres Strategy has identified five (5) centres which will be supported by a 'Place Plan' which bring together multiple specialist investigations concurrently and collaboratively.

Section 5 of the draft Centres Strategy identifies eight (8) 'Priority Centres' where policy review and works programs should be focused in the short term. This section considers each of the Priority Centres and the recommended actions for each.

### **2.3.1 Picton**

The draft Centres Strategy identifies Picton as:

*"the future civic centre of Wollondilly, to be reinforced through the implementation of the concept plan for Wollondilly Community, Cultural and Civic Precinct. Provides opportunity for intensification of the core, subject to the preservation of the integrity of heritage buildings".*

Picton town centre has a large retail and commercial area zoned B2 Local Centre under Wollondilly LEP 2011. A small area of B1 Local Centre land is located near Picton Railway Station.

The draft Strategy has proposed 6 recommendations for change. These recommendations are appropriate.

### **2.3.2 Wilton New Town**

The draft Centres Strategy describes Wilton New Town as:

*"accommodate the new District/Major Centre which will deliver a broad range of facilities and services to support the target of 15,000 new dwellings in the Wilton Growth Area, together with residents of the broader LGA".*

The draft Centres Strategy has acknowledged the future role and function of Wilton New Town, which is appropriate.

### **2.3.3 Tahmoor**

The draft Centres Strategy describes Tahmoor as:

*"the largest centre for the LGA by population measures. The Town Centre, which is located in the Picton/Tahmoor/Thirlmere (PTT) growth area, has potential for an increased density and mix of land uses and building form within the activity core and greater building heights to take advantage of the railway station positioning and the location of the Centre at the intersection of two major local road routes".*

Tahmoor centre consists of about 16 hectares of land located between the railway line and Remembrance Driveway. Land within this centre is zoned B2 – Local Centre under Wollondilly LEP 2011. A number of supermarkets are located in Tahmoor.

The draft Strategy has proposed 4 recommendations for change that address connectivity and land use issues, including:

- the railway station has notable potential to be a future focal point for activity and movement.

These recommendations are supported.

### **2.3.4 Thirlmere**

The draft Centres Strategy describes Thirlmere as:

*"a Centre located in the Picton/Tahmoor/Thirlmere (PTT) growth area which provides opportunity to retain the village and historic character whilst capitalising on the variety of community assets in or close to the activity centre".*

The Thirlmere village is a small area of about 9 hectares comprising a small supermarket and several rows of retail shops. Thirlmere's village centre is located close to Thirlmere railway station and Memorial Park. The centre is zoned B2 Local Centre under Wollondilly LEP 2011.

The draft Strategy has proposed 8 recommendations for change, including:

- Consider a demonstration redevelopment project in partnership with a developer to construct an exemplary mixed-use development on the site of the community hall.

The remaining recommendations are focused on connectivity through the village and are appropriate.

### **2.3.5 The Oaks**

The draft Centres Strategy describes The Oaks as:

*“a village that is well visited by locals and residents in a broader catchment. A growing local population. A walkable village with heritage character”.*

The Oaks is a village located north of Picton and west of Camden. It has an area of approximately 5 hectares. It is entirely zoned B2 Local Centre under Wollondilly LEP 2011. It is characterised by several groups of small shops with no large retail presence.

The draft Centres Strategy has proposed 3 recommendations for change, including:

- consider expansion of the commercial land uses in The Oaks for the area between Benton Lane and Vanderville Street to take advantage of the service function of Benton Lane and encourage activity in the northern portion of the centre (potentially encouraging the infill of the vacant site and underdeveloped land at 43-45 John Street).
- Investigate opportunities for tourism related uses of the airfield to generate employment, land-use diversity, potential entertainment available to locals as well as visitors.

These recommendations are supported.

### **2.3.6 Appin**

The draft Centres Strategy describes Appin as:

*“a heritage village with the potential for improvements in the interim to set the scheme for future longer-term growth. A Centre in a natural setting, with an emphasis on proximity to outdoor recreation activities”.*

Appin village centre has an area of about 11 hectares and includes a small supermarket and several small groups of shops. It is entirely zoned B2 Local Centre under Wollondilly LEP 2011.

The draft Centres Strategy has proposed 4 recommendations for change that are concerned with connectivity and amenity for locals and visitors. The recommendations are appropriate.

### **2.3.7 Bargo**

The draft Centres Strategy describes Bargo as:

*“a village that has the foundations of a vibrant Centre located around the station, requiring momentum to encourage an increased density of development and improved connectivity”*

The Bargo village comprises approximately 5 hectares in total (3 hectares on western side of railway and 2 hectares on the eastern side of the railway). The village is zoned B2 Local Centre under Wollondilly LEP 2011. Several groups of shops are found along the main street, including a small supermarket, medical services, food outlets and petrol station.

The draft Centres Strategy has proposed 5 recommendations for change, including proposals for better connectivity and amenity for local residents. These recommendations are supported.

### **2.3.8 Silverdale**

The draft Centres Strategy describes Silverdale as:

*“a Centre with potential for growth due to its proximity to the Aerotropolis and ability to accommodate major growth of commercial development to serve regular grocery and basic service needs of residents in the northern localities of the LGA”.*

At present, Silverdale comprises 7 hectares of land comprising a group of shops and a petrol station. Approximately half the land is zoned B2 Local Centre and the remainder B4 Mixed Use.

The draft Centres Strategy has proposed one recommendation for change. It recommends “key site to be subject to new DCP provisions for a Precinct Plan to be approved by Council and included in the DCP prior to the determination of any development application for land in the Zone B2 and Zone B4”.



### 3.0 Draft Employment Lands Strategy

#### 3.1 General Comments

The Property Council welcomes the opportunity to provide comments to Council on its draft Wollondilly Employment Lands Strategy (the Strategy). This is an important piece of evidence to guide Council's decision-making on actions to give effect to the Western City District Plan and Council's Local Strategic Planning Statement (LSPS). We generally support the Strategy and its actions.

This Strategy has been prepared in accordance with the *Greater Sydney Regional Plan* (Action 11) and the *Western City District Plan* (Action 51) and will contribute towards Council updating its land use plan, *Wollondilly Local Environmental Plan 2011* to give effect to those strategic plans.

Both of these strategic plans require Council to "retain and manage" existing industrial and urban service land within the LGA. This requires all existing industrial and urban services land to be safeguarded from competing pressures, especially residential and mixed-use zones. The intention is to retain this land for activities required for Greater Sydney's economic productivity. The Property Council disagrees with the GSC requirement for industrial land to be "retained and managed" as a blanket approach. This is a very blunt policy instrument that does not allow for a case by case review of the future use of land and prevents consideration of more flexible alternatives such as mixed-uses.

In the case of Wollondilly's industrial and urban services land supply, the "retain and manage" approach may be appropriate at this time. It is noted that the Strategy is consistent with these requirements and provides several areas for the expansion of employment uses into other areas. Having regard to the potential expansion of industrial land uses within the Wollondilly LGA, this approach is appropriate..

Wollondilly Shire LGA has an employment self-containment rate of 27%. This means that approximately 15,750 or 73% of Wollondilly's residents travel outside of the LGA to work. By 2041 there will be an additional 35,815 residents aged 15 years and older. Demand for employment land and floor area would increase if Council sought to increase the self-containment rate to minimise the number of residents travelling outside the LGA to work.

The Strategy indicates that two new employment precincts, within the LGA's Growth Areas, have been identified. The Maldon employment precinct is planned to be expanded and another adjacent to the future Wilton Town Centre. Both of these locations are appropriate areas for employment land uses given their proximity to existing road and railway transport links.

#### 3.2 Precinct Overview

Part 6 of the Strategy considers the availability of land and floor space for development for employment uses.

A floor space audit has found approximately 170,000sqm of employment floor space across the LGA. The largest industry being manufacturing (63,800sqm or 37%) followed by transport and warehousing (17,200sqm or 10%) and construction (13,787sqm or 8%). A modest 3.7% vacancy rate or 6,439sqm was reported.

In terms of available land for employment, the Strategy has found 138 hectares of vacant land and 152 hectares of developed land. The vacant land category comprises both unused land, land with storage and land which is currently under construction.

Wollondilly LEP 2011 Zoning	Vacant Land	Developed Land
IN1 General Industrial	40.6 hectares	13.2 hectares
IN2 Light Industrial	34.3 hectares	85.7 hectares
IN3 Heavy Industrial	49.6 hectares	53.2 hectares
B5 Business Development	5.8 hectares	0.4 hectares

The Strategy breaks the available land down further into constrained (120 hectares) and unconstrained (170 hectares) categories and further into constrained developable land (9 hectares) and uncontained vacant land (37 hectares). This has produced a total of 46 hectares of developable vacant land stocks (11 hectares being serviced land and 35 hectares un-serviced land). Although there is large supply of potentially developable land available in the Wollondilly Shire LGA, much of this is un-serviced. This analysis should be used by Council to identify issues that must be overcome to attract new jobs to the LGA. Obstacles that may be preventing un-serviced land from being serviced must be resolved with Sydney Water and other utility service providers.

### 3.3 Existing Employment Precinct Overview

Part 6.1.3 of the Strategy examines existing industrial and employment areas within the Wollondilly LGA, which includes the following selected precincts. We note that Wollondilly has a good mix of large industrial precincts and several smaller local employment centres occupied by both small and medium sized-enterprises. We recommend that Council use this data to identify locations where existing precincts can be expanded to increase the supply of available employment land. Many of these precincts benefit from good road and rail access and close to large population centres, which should make them attractive locations for business investment.

Given the future development of the Western Sydney Airport and Aerotropolis, the long-term expansion of the Warragamba/Silverdale precinct should be investigated. This precinct may have potential to benefit from the planned economic growth that the region will experience and the considerable infrastructure investment that is underway.

### 3.3 Strategies and Actions

The following tables considers and responds to the 5 strategies and associated actions that will give effect to the draft Strategy.



Employment Lands Strategy – Strategies & Actions	Property Council Response
<p><b><u>Strategy 1 - Unlock an immediate supply of employment precinct land to support the expansion of existing businesses and attraction of new business</u></b></p> <p><u>Actions:</u></p> <p>1.1: Investigate, with consideration of adverse impacts, rezoning land in Appin, as identified in Figure 5, for light industrial and compatible uses that cater to the growing demand generated from residential areas.</p> <p>1.2: Investigate rezoning land in Picton as identified in Figure 6 for light industrial and compatible uses to enable new business opportunities and existing business expansion.</p> <p>1.3: Investigate rezoning land in Silverdale as identified in Figure 7 for light industrial and compatible uses that enable new business opportunities and existing business expansion.</p> <p>1.4: Consider rezoning land to the west of Maldon Bridge Road from RU2 Rural Landscape to IN3 Heavy Industrial to leverage the existing intersection and enable incremental expansion of existing industries.</p> <p>1.5: Actively monitor and analyse the supply and take-up of employment land and adjust infrastructure delivery and planning accordingly using an employment land monitor.</p>	<p>The Property Council notes the chronic undersupply of new industrial land across the Sydney basin and welcomes steps to pursue the release of additional land for industrial purposes.</p> <p>Without commenting on the merits of any site-specific planning proposal, the Property Council views the steps outlines in Strategies 1 and 2 as appropriate.</p>

Employment Lands Strategy – Strategies & Actions	Property Council Response
<p><b><u>Strategy 2 – Secure a sustainable pipeline of employment land to meet future population demand</u></b></p> <p><i>Actions:</i></p> <p>2.1: Prepare a structure plan and explore rezoning for the employment land at Wilton Junction in collaboration with landowners and State Government to enable earlier delivery.</p> <p>2.2: Prepare a structure plan and explore rezoning, in collaboration with landowners and State Government, to enable earlier delivery and rezoning of land at Maldon in the Wilton Growth expansion area.</p> <p>2.3: Investigate securing land at Bargo, subject to mining subsidence issues, for longer term employment uses.</p> <p>2.4: Continue to work with the State Government to secure longer term employment land opportunity in and around the Greater Macarthur Growth Area.</p> <p>2.5: Explore opportunities to provide employment uses around areas with greatest transport connectivity.</p> <p>2.6: Provide a mix of lot sizes in new release employment areas to encourage a greater diversity of uses.</p> <p>2.7: Consider active transport options as part of future precinct planning.</p>	<p>The Property Council supports these actions to increase the pipeline of employment land to meet future demand.</p>

Employment Lands Strategy – Strategies & Actions	Property Council Response
<p><b><u>Strategy 3 – Identify development barriers and work to remove them to support employment precinct sequencing and delivery</u></b></p> <p><i>Actions:</i></p> <p>3.1: Support discussions between Sydney Water and the landowner to quickly resolve the capacity issues at Tahmoor to enable the development of the B5 Business Development zoned land.</p> <p>3.2: Working closely with DPIE and Sydney Water, prepare a targeted sewer and water priority plan, which seeks to explore and then agree on the infrastructure requirements needed to unlock employment land and meet employment targets.</p> <p>3.3: For employment precincts that are affected by mining, work with Subsidence Advisory NSW to determine and map the location of development opportunities for the industry.</p> <p>3.4: Working closely with DPIE and Transport for NSW, to prepare a targeted Road Capacity and Access Priority Plan, which seeks to explore and then agree on road infrastructure requirements needed to unlock employment land.</p> <p>3.5 Work with Transport for NSW to agree on priority transport infrastructure and delivery timeframes for game changer infrastructure projects.</p> <p>3.6 Seek to further identify and investigate key flood risk areas that may affect employment land productivity and utilisation.</p> <p>Action 3.7 Create a new or leverage existing working groups that seeks to address the critical land constraints in Wollondilly.</p>	<p>The Property Council understands the range of challenges impeding the release of land for employment generating purposes across the local government area. These challenges include utilities and infrastructure, flood, mine subsidence and environmental considerations.</p> <p>The Property Council appreciates the identification of these issues within the Strategy and looks forward to working with Council and relevant stakeholders on resolving these issues where appropriate.</p>

Employment Lands Strategy – Strategies & Actions	Property Council Response
<p><b><u>Strategy 4 – Create transparency and clarity in the planning system</u></b></p> <p><u>Actions:</u></p> <p>4.1: Consider rezoning Coull Street to a non-urban zone to provide clarity around its development intent.</p> <p>4.2: In line with the structure plan for Wilton (see Action 2.1) seek to define a clear zoning framework for higher order business zones.</p> <p>4.3: Prepare clear and succinct fact sheets that address development constraints such as mining subsidence, flooding septic management on industrial land, koala management, metropolitan rural land and the Cumberland Plain Conservation.</p> <p>4.4: Investigate planning incentive that seeks to fast track development applications where they demonstrate long term delivery on site (at a certain threshold).</p> <p>4.5: Prepare a framework for unforeseen employment opportunities.</p> <p>4.6: Update the permissibility of uses in the Local Environmental Plan to provide further clarity and distinction between zones.</p>	<p>Without commenting on the merits of individual planning proposals, the Property Council as a principle supports greater clarity and transparency in the planning system.</p> <p>We encourage Council to pursue the steps outlined in this section in a manner that minimises duplication with existing initiatives at the state and regional level and look forward to participating in early industry engagement in the delivery of these steps as required.</p>

Employment Lands Strategy – Strategies & Actions	Property Council Response
<p><b><u>Strategy 5 – Promote Wollondilly as an employment an industry destination of choice</u></b></p> <p><u>Actions:</u></p> <p>5.1: Actively identify and liaise with industrial developers to understand their preferences and gauge their interest in purchasing and bringing supply online quickly.</p> <p>5.2: Implement a Council liaison/concierge role where a person (with planning knowledge) acts as a liaison for regional business to facilitate suitable site identification, planning advice and co-location opportunities.</p> <p>5.3: Once supply is available, actively work with industry investment representative to target new businesses and promote the affordability of land in Wollondilly.</p>	<p>The Property Council supports the actions listed in this section and encourages investment attraction initiatives to have regard to Wollondilly's regional context, given the similar activities of the Western Parkland City Authority and other organisations.</p>

