



Precise Planning

Planning | Development | Management

4 June 2018
Our Ref: 1458

The General Manager
Wollondilly Council
PO Box 21
PICTON NSW 2571

Dear Sir

Planning proposal – 65 – 95 Ironbark Road Bargo

I refer to the above matter and in particular Council's letter dated 4 May 2018. This letter is intended to summarise my response to Council's letter.

Please note the following:

- 1) The land which is the subject of this planning proposal is located within an area identified by Council's *Growth Management Strategy 2011* ('GMS') as "Potential residential growth areas". The planning proposal is therefore consistent with both Council's and the community's expectations for growth in Bargo, as set out in the GMS.
- 2) The proposal is "*local infill development*". It does not seek to extend residential development beyond the confines of the existing village, because the edge of the village to the north is now 95 Great Southern Road.
- 3) First and foremost, the proposal does not fundamentally seek to play a role in meeting Sydney's regional and district housing demand, although by default any increase in supply will assist in that process. Nevertheless, this application is about existing local demand for land in Bargo and filling in existing areas which are currently utilized for rural residential purposes, although on larger lots. The proposal is not antithetical to the principles, priorities, objectives, strategies and actions contained in the *Greater Sydney Region Plan: A Metropolis of Three Cities* ('GSRP') and the *Western City District Plan* ('WCDP').
- 4) It is understood Council does not favour the introduction of R3 zoned land at this locality, as put forward by the original planning proposal. The R3 proposal was introduced here to encourage some housing diversity. Nevertheless, the proponent is agreeable to enter into discussions with Council in relation to

zone and minimum lot sizes, provided it is generally supportive of the proposal.

- 5) It is understood Council does not favour the subject land being rezoned before land closer to the edge of the existing residential land being rezoned. Also, Council has indicated it would prefer the land the subject of the planning proposal be extended through to Hawthorne Road. The proponent is open to approaching the landowners up to Hawthorne Road to be included and notes that Council could unilaterally include them in the planning proposal in any case. If this were to occur, then the proposal would adjoin existing residentially zoned land and Council's concerns regarding this land "leap-frogging" other land would be resolved.
- 6) The planning proposal (and subsequent construction of dwellings) will have no unfunded demands for infrastructure for any tier of government.

Wollondilly Growth Management Strategy ('GMS')

The Wollondilly Growth Management Strategy 2011 ('GMS') is the current place-based document guiding new growth within the LGA. Its aims are:

- *To outline clear policy directions on growth issues*
- *To achieve a long-term sound and sustainable approach to how this Shire develops and changes into the future*
- *To inform Council decisions and priorities regarding services delivery and infrastructure provision*
- *To provide Council and the community with a strategic framework against which to consider planning proposals*
- *To provide direction and leadership to the community on growth matters*
- *To assist in advocating for better infrastructure and services.*
- *To provide our strategy/response for how Council at that time saw the State Government's Metropolitan and subregional planning strategies being implemented at the local level.*

The land the subject of this Planning Proposal is identified on the Bargo Structure plan as "Potential Residential Growth Areas" within the GMS (see Figure 1 below). Note that the large red/grey arrows are identified in the legend as "Potential Residential Growth Areas". The subject land is shown in Figure 1 bounded by thick red lines. Whilst the arrows are not specifically located within the drafted boundaries of the subject land, it is clear that the intent here is for potential residential growth areas to at least extend to cover the small lots within the general vicinity (otherwise it would have been unnecessary to use an arrow shape for the symbol)¹.

¹ Referring to "Potential residential growth areas", note 3 on p78 GMS states "These lands in some cases are mapped with a definitive boundary (which may be based on a logical physical limit (eg a main road) or the findings of an endorsed strategy). However, in most cases these areas are shown using a conceptual graphical representation which does not specifically define the extent of the area. This is because the actual extent of developable land and the capacity and appropriate scale of development in any of those proposed locations is a matter which can only be determined with more detailed analysis through the rezoning assessment process"

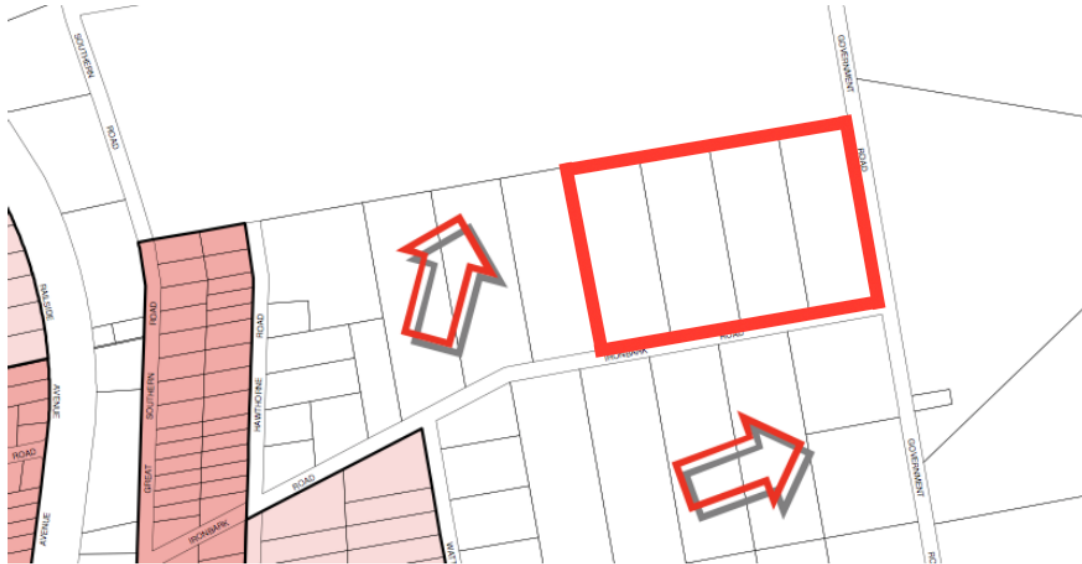


Figure 1 – Excerpt from Wollondilly GMS – Bargo Structure Plan

The GMS describes *potential residential growth areas* as follows:

“These areas have been identified through previous endorsed strategies or through more recent preliminary field work and desktop analysis. They have potential to provide growth opportunities while meeting:

- GMS Assessment Criteria (see Appendix 1)
- GMS Key Policy Directions (See Section 1.6)²

There can be no doubt that the land that is the subject of this planning proposal has already been identified by Council as having potential for residential growth and this planning proposal is consistent with this outcome.

Place-based planning approach

Considering Bargo’s future with a *place-based* approach means meeting local demand and encouraging development of a type that is consistent with the character of the town and the aspirations of its current and future residents.

Bargo has already been the subject of place-based planning, insofar as the GMS has investigated and planned for housing and other facilities in the area to develop the Bargo township. The housing targets contained in the GMS were set based on Council’s assessment of what growth Bargo could accommodate, in order for it to develop as a town consistent with the Council’s vision. This is place-based planning and is more closely aligned to Bargo and its future than the GSRP and WCDP. The GMS identifies local drivers for change (independent of Sydney’s regional and district growth demands outlined within the GSRP and WCDP), which include:

² GMS, p78

- Age structure;
- Dwelling stock;
- Migration;
- Behaviours and choices (work, lifestyle, recreation);
- Development Potential and Property Market Economics;
- Commercial and industrial developments
- Agricultural lands; and
- Conservation and environmental management

The drivers of change are intended to:

- Promote a diversity of dwelling stock particularly increasing the supply of smaller dwellings located with good access to daily conveniences including public transport;
- Promote and encourage a range of commercial and industrial developments in appropriate locations;
- Facilitate access to more employment opportunities within the region;
- Create environments with more opportunities for sustainable behaviours and choices (at both the local and regional scales);
- Provide opportunities to substitute trips by private cars by integrating land uses in combination with the provision combined with a variety of transport options.

Clearly, a placed-based planning approach (the GMS) has identified local demand and articulated a vision for the area, quite separate from the demands of Greater Sydney, the GSRP and WCDP. This proposal is playing a role in achieving this localized vision for Bargo. Indeed, the GMS itself confirms its placed-based approach, “....Wollondilly Shire is effectively not yet needed to accommodate Sydney’s growth...”³

GMS Housing Targets

The *Housing Target Distribution Table* contained in the GMS identifies the need for an additional 1,960 dwellings by 2036⁴. I am aware of around 300 lots with Gateway approval but not yet rezoned. Council will need to support every opportunity to have the land on the eastern side of the village to be rezoned for residential purposes in order have much chance of achieving its goals. This proposal is consistent with the GMS and will support Council’s local vision for Bargo.

Relevance of GMS

It is noted that a report has been prepared for consideration at Council’s meeting to be held on 18 June 2018. The item is entitled “GR4 – Reviewing the Wollondilly Growth Management Strategy 2011”.

There is nothing extraordinary in undertaking a review of a GMS. The GMS itself acknowledges that such reviews should be undertaken regularly. Whilst housing targets may change from time to time, the fundamental vision for each town and village is not likely to alter, following a review, to such an extent that there should be no growth, or even delayed growth. This would be a failure and a backward step for strategic planning in Wollondilly.

³ GMS, p11

⁴ GMS, p53

In terms of Bargo, the GMS specifically states, in relation to the *potential residential growth areas*:

"These areas have been identified through previous endorsed strategies or through more recent preliminary field work and desktop analysis."⁵

These areas have not just been carelessly identified by the GMS, rather they have been identified following careful investigation. The same indicators that drove the conclusions of the original investigations have not changed and are unlikely to arrive at a different conclusion under any GMS review.

In the aforementioned Council report's executive summary, dot point 3, the report states:

The growth targets within the Wollondilly GMS 2011 for a 20 to 25 years plan period are already expected to be met through growth already committed through rezoned land or planning proposals with a Gateway determination.

Whilst this may be accurate for Warragamba/Silverdale; The Oaks/Oakdale and Picton/Tahmoor/Thirlmere, it is noted from the report that Bargo would have a shortfall of 1,627 houses. The report notes that the target for Bargo is unlikely to be achieved in the short to medium term due to limited sewer capacity and proposed underground mining until 2038. However, both these matters are currently under investigation and, whilst they may be matters for further investigation "post-Gateway determination", they should not prevent Council allowing this proposal to proceed to that point by refusing to support it now (particularly considering the GMS identifies it for potential residential growth).

A no-growth stance

For a period of time immediately after the release of the GSRP and WCDP, Council's strategic planners were advising proponents that, with the exception of Appin and Wilton, the rest of the Wollondilly LGA was contained within a Metropolitan Rural Area ('**MRA**') and therefore no new growth (that is, rezonings for residential growth) could be supported. It is noted that, since this initial position, the Greater Sydney Commission ('**GSC**') has clarified its position, my summary as follows:

- Growth in MRAs will not play a role in meeting the housing demands at a regional or district level and therefore any growth would have to be assessed on a place-based approach, considering local demand, the character of the town or village and the surrounding landscape and rural activities; and
- Infrastructure funding availability from the three tiers of government is fully committed, so any local, place-based planning proposals would have to be able to meet infrastructure costs without placing additional demands on government.

⁵ GMS, p78

Therefore, where the above can be demonstrated (as is the case here), then that growth may be supported.

If Council were to take a ‘no growth’ or minimal growth stance then this would ultimately result in a slowing of the local economy. Many of the lifestyle facilities and services that the population enjoys require a minimum threshold of people to make viable. Without changing the distinctive character of Bargo, a certain level of continued growth is required to maintain and increase services and facilities. Each development makes an appropriate contribution to these services.

Infill development

In pursuance of a place-based approach, the development of the subject land is a logical progression for the town. The rezoning of 95 Great Southern Road has introduced an extended northern “edge” to the Bargo township. As a result, the subject land is now located between the existing residential area and 95 Great Southern Road. Consequently, **this is an infill area** (see Figure 2).

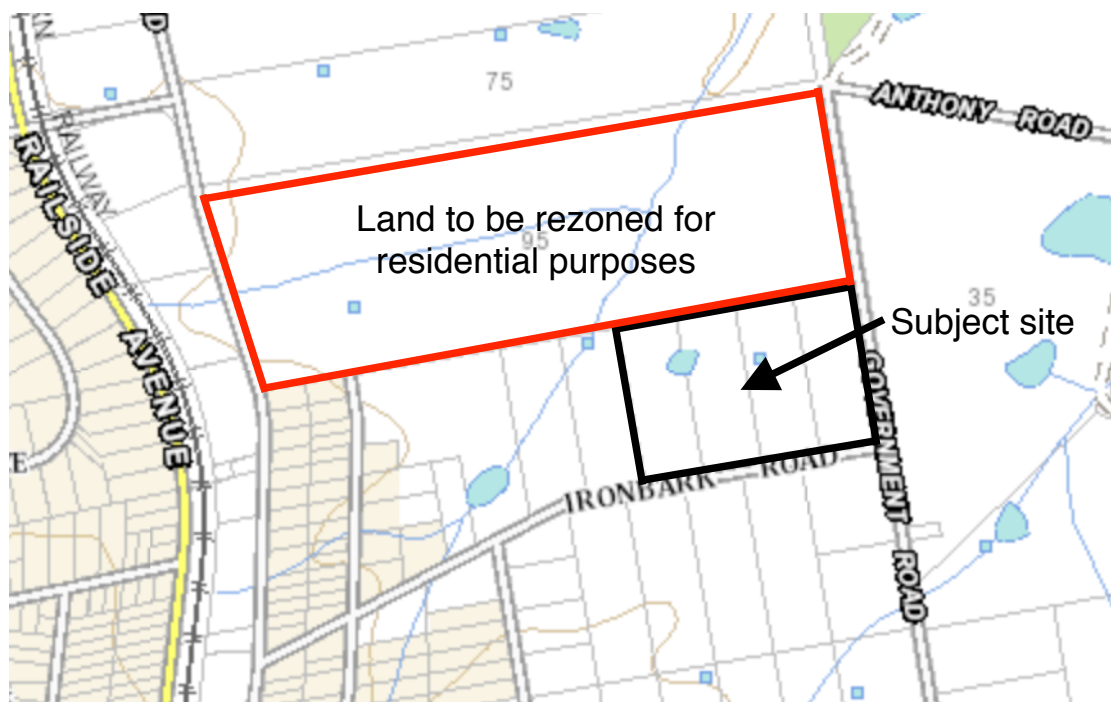


FIGURE 2 – Location of subject land in context of existing development

Therefore, this proposal is not an expansion of the town into a productive rural area. Whilst the land is currently located within an RU4 Small Lot Primary Production zone, it is:

- Identified in the GMS for potential residential growth; and
- In an “infill area” and will not result in a further expansion of the “edge” of the town

Community expectation

It is noted with interest that the community response to the planning proposal following the public exhibition was rather underwhelming. Two (2) community submissions were received by Council, neither fully objecting to the proposal. On the contrary, I understand one submission wanted the proposal to extend westward to the edge of the existing residential zone (which the proponent is open to discussion) and the other suggesting the proposal extend to the other side of Ironbark Road.

Clearly the community has an expectation that this infill area will be developed for residential housing and this expectation forms part of the place-based approach to strategic planning for the locality.

Infrastructure funding

The proposal will place no burden on either the State government or Council in terms of infrastructure. The subdivision would be levied by Council under the contributions plan applicable at the time. Consequently, the development would 'pay its way' in terms of:

- Open Space, sport and recreation;
- Library and community facilities;
- Transport and traffic (roads and intersections)
- Transport and traffic (cycleways)
- Bushfire protection

All future lots would pay property rates to Council. Road upgrading along the frontage of the site would be funded by the proponent at the development stage, with no financial impost on Council.

The provision of reticulated water, electricity supply, telecommunications would be funded by the proponent as part of the development cost, with no cost implications to the State government.

The current bus network within Wollondilly is generally under-utilised and so the additional demand for public transport is expected to be largely taken up by the current services becoming better utilized and thus more viable.

Greater Sydney Region Plan and Western City District Plan

Responses to the matters raised in relation to the *Greater Sydney Region Plan: A Metropolis of Three Cities* ('GSRP') and the *Western City District Plan* ('WCDP') are provided in the following Tables.

Objectives

<i>Objectives</i>	<i>Response</i>
Objective 22: <i>Investment and business activity in centres</i>	This proposal DOES NOT extend rural towns and villages beyond their current boundaries,

Objectives	Response
<ul style="list-style-type: none"> Expanding rural towns and villages beyond their current boundaries to accommodate new business activity should be considered only when this is linked to a growth management plan for the whole town or village, and should not compromise the values and character of nearby rural and bushland areas 	<p>because it is an infill subdivision (refer to previous discussions and Figure 2). Nevertheless, the land subject to this proposal IS LINKED to a growth management plan, that being the Wollondilly Growth Management Plan ('GMS') 2011⁶. We contend that the proposal will in no way compromise the values and character of nearby rural and bushland areas, because it is an infill development, which has been identified for potential residential growth.</p>
<ul style="list-style-type: none"> Objective 24: Economic sectors are targeted for success The proximity of rural residential development to agricultural, mining and extractive industries that generate odour, noise and other pollutants can be a source of conflict. There is a need to provide important rural industries with certainty so their operations can continue without encroachment from incompatible land uses. At the same time, the protection of land for biodiversity offsets and the rehabilitation of exhausted resource extraction areas support the re-establishment of significant ecological communities in the Metropolitan Rural Area into the future. 	<p>This planning proposal is not seeking to create a rural-residential subdivision, so this objective is not relevant to this proposal.</p>
<p>Objective 27: Biodiversity is protected, urban bushland and remnant vegetation is enhanced</p> <ul style="list-style-type: none"> Providing incentives for landowners in the Metropolitan Rural Area to protect and enhance the environmental values of their land and connect fragmented areas of bushland can deliver better outcomes for biodiversity and greater opportunities to create biodiversity offsets 	<p>The vegetation on the site has been assessed by Ecoplaning. It is considered too small an area for preservation under biobanking and there are no opportunities reconnect fragmented bushland due to the imminent rezoning of 95 Great Southern Road and 55 Government Road</p>
<p>Objective 28: Scenic and rural landscapes are protected.</p> <ul style="list-style-type: none"> The Metropolitan Rural Area and the Protected Natural Area (ie National Parks) create a range of attractive visual settings to the north, west and south of Greater Sydney. With rising demand for biodiversity offsets and continuing support for traditional forms of agriculture within the Metropolitan Rural Area, more opportunities can be realized to protect and enhance natural landscapes. 	<p>This area is not a rural area in the common understanding of the term. It is at the edge of existing urban development and is basically in a holding pattern, awaiting a rezoning so that it can become productive again.</p>
<p>Objective 29: Environmental, social and economic values in rural areas are protected and enhanced.</p> <ul style="list-style-type: none"> Urban development is not consistent with the values of the Metropolitan Rural Area. This Plan identifies that Greater Sydney has 	<p>The current proposal has little to do with contributing to the growth targets for the Greater Sydney area, although any increase in land stock will help ease that burden. The Greater Sydney Region Plan concerns itself</p>

⁶ It is relevant to note that the WCDP (p44) recognises the Wollondilly GMS

Objectives	Response
<p>sufficient land to deliver its housing needs within the current boundary of the Urban Area, including existing Growth Areas (ie Wilton). This eliminates the need for the Urban Area to expand into the Metropolitan Rural Area. From time to time, there may be a need for additional land for urban development to accommodate Greater Sydney's growth, but not at this stage. Future region plans will identify if additional areas of land in the Metropolitan Rural Area are required for urban development.</p> <ul style="list-style-type: none"> Restricting urban development in the Metropolitan Rural Area will help manage its environmental, social and economic values, help to reduce land speculation, and increase biodiversity from offsets in Growth Areas and existing urban areas. Towns and villages: Maintaining and enhancing the distinctive character of each rural and bushland town and village is a high priority. Ongoing planning and management of rural towns and villages will need to respond to local demand for growth, the character of the town or village and the values of the surrounding landscape and rural activities. Rural lands: Parts of the urban-rural fringe are owned by Local Aboriginal Land Councils. Future planning of these areas may be more flexible in order to balance rural values with greater economic participation, and community and cultural uses by Aboriginal people 	<p>with managing Sydney's growth, however it encourages place-based planning within the Metropolitan Rural Area. In terms of place-based planning we contend that this proposal is perfectly consistent with the GMS, which is in essence a place-based planning document. The proposed development will result in manageable environmental, social and economic impacts. There is a demonstrable local demand for lots in Bargo, as recently demonstrated by the marketing activity that has occurred on 95 Great Southern Road. The proposal will enhance the distinctive character of Bargo, through the creation of residential lots at the edge of the existing village.</p>

TABLE 1

Objectives – Greater Sydney Regional Plan

Strategies

Strategy	Response
<p>Strategy 16.1: Manage the interfaces of industrial areas, trade gateways and intermodal facilities (such as the Western Sydney Airport and Badgerys Creek Aerotropolis) by providing buffer areas to nearby activities such as residential uses that are sensitive to emissions from 24-hour port and freight functions</p>	<p>I see no relevance for this strategy in relation to the current planning proposal.</p>
<p>Strategy 29.1: Maintain or enhance the values of the Metropolitan Rural Area using place-based planning to deliver targeted</p>	<p>Environmental, social and economic values are considered in detail in the GMS, which is a place-based planning document. The conclusion of the</p>

Strategy	Response
<i>environmental, social and economic outcomes</i>	GMS ids that 1960 additional dwellings will be required in Bargo over the next 20 years or so. This proposal seeks to play a role in achieving this vision and therefore is consistent with the GMS.
Strategy 29.2: <i>Limit urban development to within the Urban Areas of Wollondilly</i>	We contend this strategy relates to developments that are intended to play a role in helping to achieve regional and district housing targets for the whole of Sydney. This proposal does not play this role, because it is consistent with a place based planning approach to help deliver the long-term local vision for Bargo, articulated in the GMS.

TABLE 2

Strategies – Greater Sydney Regional Plan

Planning Priorities

Planning Priority	Response
<i>The District Plan informs local strategic planning statements and local environmental plans, the assessment of planning proposals as well as community strategic plans and policies</i>	This proposal is not antithetic to the relevant principles, priorities, objectives, strategies and actions contained in the GSRP and WSDP
Liveability: <i>A place-based and collaborative approach is required to maintain and enhance the liveability of the Western City District. This can be achieved by the following Planning Priorities:</i>	
W3 – <i>Providing services and social infrastructure to meet people's changing needs</i>	W3 – Social infrastructure is typically assets such as schools, universities, hospitals, prisons, community housing, libraries, community centres, halls/hubs, childcare centres, affordable housing, sporting fields and the like. The proposal will assist in the provision of some of these social infrastructure assets through developer contributions.
W4 – <i>Fostering healthy, creative, culturally rich and socially connected communities.</i>	W4 – The subdivision allows the opportunity for a popular and affordable form of housing to meet local demand.
W5 – <i>Providing housing supply, choice and affordability, with access to jobs, services and public transport.</i>	W5 – The proposal provides housing supply, choice and affordability, with access to jobs because of easy access to the Bargo village, southern highlands, Tahmoor/Picton and the motorway to Sydney. It is expected that public transport services will expand in the area in line with demand.
W6 – <i>Creating and renewing great places and local centres, and respecting the District's heritage.</i>	W6 – The proposal will create an exciting new place. The scale of the development and the built form will respect the District's heritage

Planning Priority	Response
<p>Sustainability: For the District, an integrated approach to improving sustainability can be achieved by the following Planning Priorities:</p> <p>W12 – Protecting and improving the health and enjoyment of the District’s waterways.</p> <p>W13 – Creating a Parkland City urban structure and identity.</p> <p>W14 – Protecting and enhancing bushland and biodiversity.</p> <p>W15 – Increasing urban tree canopy cover and delivering Green Grid connections.</p> <p>W16 – Protecting and enhancing scenic and cultural landscapes.</p> <p>W17 – Better managing rural areas</p> <p>W18 – Delivering high quality open space.</p> <p>W19 – Reducing carbon emissions and managing energy, water and waste efficiently.</p> <p>W20 – Adapting to the impacts of urban and natural hazards and climate change.</p>	<p>W12 – The proposed development will demonstrate a Neutral or Beneficial Effect on local waterways.</p> <p>W13 – Whilst not specifically relevant, the development will include street planting in a landscaped surrounding.</p> <p>W14 – Preliminary investigations have been undertaken by Ecoplanning. Where vegetation is required to be removed, in will be offset with credits</p> <p>W15 – Street tree planting will be undertaken</p> <p>W16 – The site is not on a ridgeline or other scenic landscape</p> <p>W17 – The land is too close to the existing residential area for any intensive rural use. Given the land is identified for potential residential development, this proposal represents an appropriate future use of the land.</p> <p>W18 – Whilst this proposal will not directly create public open space, it will contribute to the provision of open space through developer contributions</p> <p>W19 – The future development will be guided by the requirements of service agencies and the technology available at the time</p> <p>W20 – Site-specific hazards will be investigated as the Planning proposal is advanced.</p>
<p>Planning Priority W5: Providing housing supply, choice and affordability, with access to jobs, services and public transport.</p> <ul style="list-style-type: none"> The Growth Area programs of the NSW Dept Planning & Environment guide the development of new communities in land release areas and provide significant capacity into the medium and longer term. These include the Wilton and parts of the Greater Macarthur Growth Areas. 	<p>This priority is relevant for the urban release areas. However, the proposal will provide a greater range of housing supply, choice and affordability generated by local demand and preferences.</p>
<p>Planning Priority W16: Protecting and enhancing scenic and cultural landscapes.</p> <ul style="list-style-type: none"> The Wollondilly LGA benefits from substantial areas of protected national parks, rivers and creeks, and water catchments that provide outstanding landscapes and views. Rural towns and villages in the valleys and plains to the east of the national parks are set between a series of hills and ridgelines that are special to the District’s character and identity. Ridgelines are highly valued elements of scenic landscapes, and development should not diminish their scenic quality. Continued protect of the Western City District’s 	<p>The development does not extend to the ridgelines and therefore will not diminish their contribution to the scenic quality of the area at this location.</p> <p>Biodiversity and habitat will be managed in accordance with the relevant legislation.</p> <p>Natural hazards will be avoided.</p> <p>An Aboriginal Due Diligence Assessment would be undertaken as this Planning Proposal is advanced.</p>

Planning Priority Response

scenic and cultural landscapes is important for the sustainability, liveability and productivity of the District. It can complement the protection of biodiversity and habitat, help manage natural hazards and support tourism. Protecting scenic and cultural landscapes can also help preserve links to Aboriginal cultural heritage.

Planning Priority W17: Better managing rural areas.

- 'Greater Sydney Region Plan: A Metropolis of Three Cities' takes a strategic approach to delivering Greater Sydney's future housing needs within the current boundary of the Urban Area including Growth Areas. Urban development in the Metropolitan Rural Area will only be considered in the urban investigation areas identified in A Metropolis of Three Cities (no urban investigation areas are located in the Wollondilly Local Government Area). This approach protects and supports agricultural production and mineral resources by preventing inappropriately dispersed urban activities in rural areas.
- Maintaining and enhancing the distinctive character of each rural and bushland town and village is a high priority. Ongoing planning and management of rural towns and villages will need to respond to local demand for growth, the character of the town or village and the surrounding landscape and rural activities. Rural and bushland towns and villages will not play a role in meeting regional or district scale demand for residential growth.
- The Western City District's rural areas contain large areas that serve as locations for people to live in a rural or bushland setting. Rural-residential development is not an economic value of the District's rural areas and further rural residential development is generally not supported. Limited growth of rural residential development could be considered where there are no adverse impacts on the amenity of the local area and the development provides incentives to maintain and enhance the environmental, social and economic values of the Metropolitan Rural Area. This could include the creation of protected biodiversity corridors, buffers to support investment in rural industries and protection of scenic landscapes.

Planning Priority W20: Adapting to the impacts of urban and natural hazards and climate change.

- Consideration of natural hazards and their cumulative impacts includes avoiding growth and development in areas exposed to natural hazards and limiting growth in existing

The "urban development" referred to residential growth which is intended to contribute toward Greater Sydney's future housing needs. This proposal does not primarily purport to contribute toward meeting these regional and district needs, but rather the proposed subdivision seeks to satisfy the aspirational objectives of locals who are seeking a particular lifestyle. This proposal is consistent with the GMS, which is a place-based document and it identifies this area for potential residential development.

The subject site is not subject to flooding. Geotechnical stability assessments can be undertaken as the Planning Proposal progresses. Bushfire risks may be mitigated by maintaining APZs.

Planning Priority	Response
communities that are exposed and vulnerable to natural hazards	

TABLE 3

Planning Priorities – Western City District Plan

Actions

Actions	Response
Action 35: <i>Protect and support agricultural production and mineral resources (in particular, construction materials) by preventing inappropriately dispersed urban activities in rural areas</i>	This location is not “inappropriately dispersed”, but rather is an infill subdivision, on land already identified for potential residential growth
Action 41: <i>Consider opportunities to enhance the tourist and visitor economy in the District, including a coordinated approach to tourism activities, events and accommodation</i>	N/A
Action 78: <i>Maintain or enhance the values of the Metropolitan Rural Area using place-based planning to deliver targeted environmental, social and economic outcomes</i>	This action has been discussed previously in this letter. The proposal will deliver specific environmental, social and economic outcomes Environmental: It will appropriately manage environmental impacts; Social: Developer contributions will help fund social outcomes Economic: Building activities will generate economic activity and increased population will generate increased commercial activity in Bargo
Action 79: <i>Limit urban development to within the Urban Areas of Wollondilly (including the Wilton Growth Area)</i>	The urban development referred to in Action 79 is that which is intended to contribute to meeting Sydney’s regional and district growth needs. This development is based on furthering the interests of the Bargo area through a place-based planning approach, delivering a subdivision to meet the aspirational demands of locals in the home buyer market.
Action 88: <i>Avoid locating new urban development in areas exposed to natural and urban hazards and consider options to limit the intensification of development in existing urban areas most exposed to hazards</i>	The subject site is not subject to flooding. Geotechnical stability assessments can be undertaken as the Planning Proposal progresses. Bushfire risks may be mitigated by maintaining APZs.

TABLE 4

Actions – Western City District Plan

This proposal will be a positive outcome for the local area, in terms of environmental, social and economic outcomes. It is contended that this proposal is consistent with,

and not antithetic to, the Greater Sydney Regional Plan and the Western City District Plan, as demonstrated above, because it has evolved through a place-based planning approach. This proposal is good for Wollondilly and Council's support is strongly encouraged.

I look forward to a favourable outcome.

Yours faithfully

PRECISE PLANNING