



Hawkesbury City Council

attachment 1
to
item 55

Copy of Submissions - Draft
Rural Lands Strategy

date of meeting: 30 March 2021
location: council chambers
time: 6:30 p.m.

From: [REDACTED]
Sent: Mon, 15 Feb 2021 16:18:39 +1100
To: Hawkesbury City Council
Subject: Submission to draft Hawkesbury Rural Land Strategy
Attachments: 2021-02-15 DPI Ag submission to draft Hawkesbury Rural Land Strategy.pdf

Hello,
Attached is DPI Agriculture's submission to the draft Hawkesbury Rural Land Strategy.

Yours sincerely

[REDACTED]





OUT21/1549

Mr Andrew Kearns
Manager Strategic Planning
Hawkesbury City Council
PO Box 146
WINDSOR NSW 2756

council@hawkesbury.nsw.gov.au

Dear Mr Kearns

Draft Hawkesbury Rural land Strategy

Thank you for the opportunity to provide comment on the Draft Hawkesbury Rural Land Strategy (draft strategy).

The NSW Department of Primary Industries (NSW DPI) Agriculture is committed to the protection and growth of agricultural industries, and the land and resources upon which these industries depend.

We have reviewed the draft strategy and note its thorough assessment of existing and potential agricultural land uses and its consideration of the challenges and opportunities for agricultural industries in the LGA. The following comments are offered for Council's consideration.

Rural zones

The draft strategy's proposal to review and recast the application of rural zones in the local government area (LGA) and apply the RU1 Primary Production zone to the highest quality agricultural land in the LGA is supported.

Growth Management

The draft strategy could provide a clearer direction on growth management in rural areas of the LGA. The statement in the draft strategy that many of the 'local centre – villages' are not suitable for future growth, appears to be contrary to the action in Council's draft Housing Strategy to '*Accommodate continued incremental growth in rural villages, whilst maintaining the local character and respecting environmental constraints*'. It is considered that a clear direction for growth in rural villages needs to be established which is consistent across both strategies.

Similarly, the draft strategy does not provide a clear strategic direction on the future of rural residential development in the LGA. Council's draft Housing Strategy deferred consideration of rural residential development to the rural land strategy (*The future use of the R5 zone will be further considered in the Hawkesbury Rural Lands Strategy which is currently in preparation (p127)*). And the draft Local Strategic Planning Statement identified the rural land strategy as the mechanism for providing a clear strategic direction for rural residential development.

NSW Department of Primary Industries - Agriculture
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It is strongly recommended that council should establish a clear strategic direction for rural residential development in the LGA to avoid ad hoc proposals that are not guided by either the rural land strategy or the housing strategy.

Nevertheless, the identification of exclusionary criteria in the draft strategy such as 'prime agricultural land' and 'proximity to agricultural development (500m buffer)' as criteria by which land should be excluded from consideration for future urban development is supported. Council should ensure that the description of 'prime agricultural land' referred to in the strategy is sufficient to cover other agricultural land descriptions that may be adopted in future such as State Significant Agricultural Land or Important Agricultural Land.

I note the draft strategy has identified a lower level of available services for the population of the rural areas of the LGA (section 6.9 of the draft strategy). DPI Agriculture supports measures to ensure the rural population has adequate access to services and infrastructure, however the draft strategy should be careful not to be seen to support the development of additional urban development types (such as service hubs) in rural areas which may encourage greater residential land use in rural zones.

Land Uses

The draft strategy proposes new land use terms and changes to land use definitions. DPI Agriculture does not object to the proposed additions or changes to land use terms. However, we strongly suggest that rural tourist cabins should not be permitted on high quality agricultural land proposed to be zoned RU1 (currently zoned RU2) and the proposed heads of consideration clause should be adopted to minimise the potential impact of them on agricultural land uses.

The proposed new definition for 'protected cropping structure' is supported though it is suggested that the strategy should also consider the most appropriate zones for these structures and detail some appropriate development controls to be included in Council's Development Control Plan.

Environmental Zones

It is noted that the draft strategy proposes recasting the zones in the rural areas and where investigations confirm that land contains significant native vegetation then an environmental zone may be applied.

DPI Agriculture does not oppose the application of environmental zones to land with appropriate attributes, however Council should note that rezoning rural zoned land to an environmental zone can have implications for native vegetation management, farming activities and private native forestry under other legislation. It is strongly recommended that Council consider these factors when considering the application of zones in rural areas.

Environmental Considerations

The draft strategy recognises that the water quality in water courses in the LGA can have significant impacts on the natural systems that rely on these water courses. The draft strategy notes that agricultural activities can have an adverse impact on water quality. While this is not disputed, it is suggested that buffers between agricultural activities and water courses, as recommended in the draft strategy, are not the only option for preventing agricultural impacts on water quality. Improvements in farm practices can avoid water pollution without preventing agricultural use of rural land by imposing buffers and it is suggested that the draft strategy could include some discussion on this option.

Format of the Draft Strategy

The format of the draft strategy could be improved to clearly describe the strategic direction for rural land in the LGA. The recommended actions from the draft strategy are not clearly presented in the document and do not clearly address some of the actions for rural land contained in the draft Local Strategic Planning Statement.

The draft Strategy as exhibited has excellent utility as a rural land study. It is however suggested that a separate, more concise, rural land strategy could be developed which includes a table of the final recommended actions and a time frame for their implementation to enable efficient monitoring and reporting. This suggested format would enable development of a clear line of sight through the directions and actions of the strategic planning framework to the recommendations of the draft strategy, and in doing so would set out the clear strategic planning direction for the rural lands of the Hawkesbury LGA.

Should you require clarification on any of the information contained in this response, please contact [REDACTED]

Yours sincerely

[REDACTED]

Sydney Water comments - Draft [Hawkesbury Rural Lands Strategy](#)

Draft Strategy Key Recommendations	Reference	Sydney Water Feedback
Growth Management	Section 6.5	<p>Sydney Water notes the strategy's proposed settlement hierarchy for guiding urban expansion which is consistent with the Hawkesbury Housing Strategy. The Hawkesbury is classed as a metropolitan rural area under the Greater Sydney Region Plan.</p> <p>Sydney Water requests the opportunity to collaborate further with Council on servicing growth in local settlements. This is because the strategy explores potential wastewater and recycled water services opportunities.</p> <p>Based on the information provided within Council's Local Strategic Planning Statement and the Local Housing Strategy, Sydney Water is aware of the growth projections for the LGA and is keen to continue to work with Council to provide timely and sustainable services.</p> <p>Proposals would need to be assessed by Sydney Water, in detail, with further information needed regarding proposed local development and associated timescales.</p> <p>Please note, in relation to table 6.1 Services and Facilities in Settlements, the existing urban settlement at Agnes Banks is serviced by reticulated wastewater. Sydney Water delivered wastewater services to the Agnes Banks settlement in 2010 in line with the NSW Government's Priority Sewerage Program.</p>
Domestic Effluent Disposal	Section 6.5 p.207	<p>In relation to appropriate methods and lot sizes for on-site sewage management, Sydney Water recommends the strategy refer to Office of Local Government's 'Environment and Health Protection Guidelines: On-site Sewage Management for Single Households' (1998) (see https://www.olg.nsw.gov.au/councils/council-infrastructure/services-to-communities/on-site-sewage-management/)</p>
Rural Lands and Land Use Zoning	Section 6.7	<p>In relation to servicing rural villages, rural residencies, and agricultural land-uses, Sydney Water is not required to provide water or wastewater services to these areas.</p> <p>Sydney Water can provide water servicing to rural areas but this is considered on a case-by-case basis and is determined by the type/scale of land-use proposed when it is submitted to Sydney Water for assessment.</p> <p>Sydney Water may choose to defer works to service a property should the site not be close to existing water services. This is also dependent on whether adjacent land is also being developed. There are no requirements that Sydney Water must service rural zoned properties beyond our limits of supply.</p>

Draft Strategy Key Recommendations	Reference	Sydney Water Feedback
		<p>Sydney Water therefore asks that Council continues to liaise with Sydney Water in relation to chapter 6.7 of the report which discusses changes to zoning.</p> <p>In addition, Sydney Water requests Council provide GIS copies of the existing and proposed zoning maps so that we can overlay this with our servicing catchments to investigate whether any proposed zoning changes would impact servicing ability.</p>
Economic Development and Infrastructure	Section 6.4	<p>It may also be worth recognising Sydney Water's intention to establish a collaboration with Council, Western Sydney University and the Western Parkland City Authority. This is to develop a concept for a food, energy, water and waste hub around Sydney Water's Richmond Water Recycling Plant and the University's Agricultural Campus.</p>

RESPONSE TO HAWESBURY RURAL LANDS STRATEGY 15/2/2021

SUBMISSION BY – [REDACTED]

ADDRESSING – PLANNING PRIORTIES REGARDING SUSTAINABILITY

This submission is based around Planning Priority 13 – Protect areas of high environmental value and significance.

I have a lifetime of experience in the Hawkesbury and have spent most of my life exploring and observing the wilderness areas of the Hawkesbury. I have a great passion for the protection and preservation of our wilderness areas.

I have been proactive in trying to protect the environment by advocating for sustainable land management practices.

I have been called as an expert witness in 9 state, federal and coronial inquiries into bushfires. The last inquiry I attended was the Royal Commission into the 2019-20 Black Summer fires.

I have 53 years' experience as a volunteer fire fighter and [REDACTED]
[REDACTED]
[REDACTED]

The 2019-20 Black Summer fires were disastrous for the Hawkesbury, taking a huge toll.

The reason these fires were so disastrous is that we have moved away from the Indigenous practice of regular cool mosaic burning.

We instead have state legislated regulations (The Bushfire Environmental Assessment Code) that actively prevent this practice from taking place.

I encourage the Council to support the reintroduction of Indigenous burning practices throughout the Hawkesbury.

I also encourage the Council to stop the way the National Parks and Wildlife Service (NPWS) rehabilitate trails that are opened during section 44 fires.

In October 2020 the NPWS rehabilitated this trail at Kurrajong Heights. I have included 3 of 96 photos I have in this submission.

The rehabilitation involved pushing over hundreds of live trees over the full length of an approx. 2.5km trail. The trees pushed over included numerous banksias in excess of 100 years of age.

This is evidence from just one of the rehabilitated trails that took place in the Hawkesbury. I believe this type of rehabilitation took place over 86kms of trails in the Hawkesbury.

In my opinion this practice is not desirable or sustainable.





I also encourage the Council to adopt the 25m rule that allows landholders that adjoin bushland in fire risk areas to clear 25m along their fence line.

This would allow fire fighters perimeter access to properties and provide a safer working environment for fire fighters.

I am happy to talk to Council in much greater detail if required.

Regards, [REDACTED]

General Manager
Hawkesbury City Council
BY EMAIL

Dear General Manager,

RE: Rural Lands Strategy Submission

Please find below comments on various section of the Draft Rural Lands Strategy.

Section 1.4: SEPPs (Page 200)

No change to exempt and complying development should be made including on sheds. The whole idea of SEPPs for exempt development is to avoid the long and expensive DA process. No evidence has been provided that would justify changes to the SEPP's.

Section 2.2 Rural Land Use

In this document there is a major focus on Agri businesses and Agri tourism. While this is a good thing it has been promoted in the Hawkesbury for at least the last 30 years, and there has been little economic development in this area according to Council's own documents.

Hawkesbury has a massive area of world heritage National Park that gives a huge opportunity for sustainable tourism. All types of sustainable tourism should be encouraged and supported in the policy. They are not given sufficient consideration. Council in this Rural Land Use strategy needs to promote all opportunities in Agri and Rural and Natural Environment experience tourism.

Examples already exist in the Hawkesbury, rural area tourist cabins, eco-tourist accommodation, function centres, restaurants and all then secondary businesses like nature tours, stargazing, guided bush walks, heritage tours etc already exist but are not documented in this strategy, a concerning limitation of the document given they are a significant employment generator in our rural communities. Again this is acknowledged in other document authored by Council.

All these businesses could be pursued before the 2012 LEP change under the permissible use "Tourist Facility". Since the 2012 standard instrument came into effect they fell into "existing use" and their further development has been stymied by this.

The importance of these tourism drivers of employment in the rural economy is not given the weight that it deserves. It brings more employment than agriculture and all agricultural businesses now engage in agri-tourism. Using the Bilpin area as an example one of the biggest and few remaining farms in the area has a gross income of \$600,000 per annum. A number of the biggest tourist businesses in Bilpin have a gross income of over 2 million dollars per annum. Most of these businesses were approved under "tourist facilities" pre-2012.

Section 6.8.1 Definitions

At page 240, note problems that occurred with the standard definitions coming into effect. It says that tourist cabins cannot be built under the current definitions; that there is a need for accommodation; and that there was a problem with people building just one tourist cabin and using it as a second dwelling house. No evidence has been provided to support this last statement and in our rural communities it is considered an urban myth. This is also part of an apparent broader myth within Council as to why tourist cabins were left out of RU2 in the LEP 2012 standard instrument. It goes to the lack of integrity of information contained in this document which is very poorly referenced.

And while we are debunking urban myths generated by Council the real reason why "Tourist and visitor accommodation" were left out of the 2012 LEP was they were exhibited by mistake in the without consent column, and instead of being moved to the with consent column it was simply left out. This is well documented in Councils Extraordinary meeting 7 June 2011. This has led to a countless number of problems with developing Tourist Cabins in RU2.

In short, if HCC is now supportive of tourism then Council must include pro-tourism definitions. See specific examples below.

Farm Stay definition

You can build tourist accommodation up to 4 cabins under Farm Stay, but it has to be secondary income to primary production. The word secondary is the problem as just one tourist cabin can produce more income than a small farm. This could be overcome by the Rural lands Strategy defining secondary as a second income that does not have to be less than the primary production farm income.

Hotel or motel accommodation

This form of accommodation was left out of RU2. To include this permissible use in RU2 would allow tourist accommodation to be built in RU2 without the need to have a working farm. Objections that led to the exclusion of this in 2012 LEP was that pubs could be established in RU2, however the wording relates to accommodation not a venue for selling or consuming alcohol or food services.

Serviced apartment

This should be included in RU2. The definition neatly fits with what rural tourist accommodation is, apartments (cabins or structures) that are serviced (cleaned and checked to make sure everything is working) before customers stay.

Tourist and visitor accommodation

This use was infamously exhibited in the draft 2012 LEP in the wrong column for RU2, which then caused it to be excluded from the 2012 LEP RU2. It was included in all the other R zonings because they didn't suffer this administrative error. The definition covers Backpackers accommodation, Bed and Breakfast, Farm Stay, Hotel

and motel accommodation and Serviced apartment. The standard instrument gives this option as a use which allows these 4 subsets.

There is no problem with this definition as long as it is put back in the RU2. Its inclusion in RU1, RU4, RU5, R1 to R5 highlighting the mistake back in LEP 2012.

The idea canvassed in the Draft Rural Lands Strategy document to create a definition for rural cabins is not necessary and goes against the whole concept of why the State implemented a standard instrument of definitions in the first place. The only beneficiary of this action would be the consultant who got the contract to embark on this misadventure. The question must be asked, why is Council doing this?

Function Centres

This big employment generator for Hawkesbury is still missing from all but one zoning area, B2. This matter deserves an inquiry by NSW Planning to determine why this is the case.

Specifically, this excludes venues for conferencing. The Hawkesburys location on the fringe of Sydney makes it an ideal location for modest scale rural conference facilities. Conference delegates fill restaurants, attractions, our towns & villages (often midweek when businesses are quiet) yet Council does not encourage conferencing.

Once again the question must be asked, why is Council doing this?

Argi-tourism (page 202)

The focus on Agritourism is only a part of the picture of our rural lands. The definition outlined on page 202" *the act of going to a region for the purpose of visiting a working farm winery or other food or fibre related operation* "is not a standard definition and therefore should be avoided.

Dual occupancy detached

Council in the past has supported dual occupancy detached. It was knocked back by state planning until a flood strategy was done. Part of the Rural lands strategy should be to pursue dual occupancy detached. It would allow more accommodation in an area like Bilpin allowing people a place to live near their workplace and accommodation which is sorely needed to cater for the large numbers of people day tripping in the area that would like to stay overnight. It would also allow for older residents to have a secondary dwelling for carers and be able to stay in their homes in their community in old age.

General Comments

1. We ask that Tourist and visitor accommodation be reinstated back into RU2; and tourism accommodation farm stay as a secondary income not to have to be less than the primary production income.

2. About this report

This report is poorly referenced and contains misleading information. One example is on page 156 which has alluvial river flats including Mountain Lagoon and Mt Tootie. Another is 1.4.3 has RU2 as being 10 HA minimum subdivision. Most of RU2 is 40HA minimum subdivision. Using consultants who obtain information by sitting at their desks and or driving around looking at places does not produce reliable data that is going to effect the lives of many Hawkesbury residents.

██████████

██████████████████

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BELOW ARE EXERTS FROM THE 2012 HAWKESBURY LEP

tourist and visitor accommodation means a building or place that provides temporary or short-term accommodation on a commercial basis, and includes any of the following—

- (a) backpackers' accommodation,
- (b) bed and breakfast accommodation,
- (c) farm stay accommodation,
- (d) hotel or motel accommodation,
- (e) serviced apartments,

but does not include—

- (f) camping grounds, or
- (g) caravan parks, or
- (h) eco-tourist facilities.

farm stay accommodation means a building or place that provides temporary or short-term accommodation to paying guests on a working farm as a secondary business to primary production.

Note—

See clause 5.4 for controls relating to the number of bedrooms.

Farm stay accommodation is a type of ***tourist and visitor accommodation***—see the definition of that term in this Dictionary.

(5) **Farm stay accommodation** If development for the purposes of farm stay accommodation is permitted under this Plan, the accommodation that is provided to guests must consist of no more than 4 bedrooms.

hotel or motel accommodation means a building or place (whether or not licensed premises under the [Liquor Act 2007](#)) that provides temporary or short-term accommodation on a commercial basis and that—

- (a) comprises rooms or self-contained suites, and
- (b) may provide meals to guests or the general public and facilities for the parking of guests' vehicles,

but does not include backpackers' accommodation, a boarding house, bed and breakfast accommodation or farm stay accommodation.

serviced apartment means a building (or part of a building) providing self-contained accommodation to tourists or visitors on a commercial basis and that is regularly serviced or cleaned by the owner or manager of the building or part of the building or the owner's or manager's agents.

Note—

Serviced apartments are a type of ***tourist and visitor accommodation***—see the definition of that term in this Dictionary.

function centre means a building or place used for the holding of events, functions, conferences and the like, and includes convention centres, exhibition centres and reception centres, but does not include an entertainment facility.

council@hawkesbury.nsw.gov.au(External link)



United Nations
Educational, Scientific and
Cultural Organization



Greater Blue Mountains Area
inscribed on the World
Heritage List in 2000



PO Box 6 Glenbrook NSW 2773

Phone: 0419 307 099

gbm.worldheritage@environment.nsw.gov.au

General Manager
Hawkesbury City Council
PO Box 146
WINDSOR 2756
Via email: council@hawkesbury.nsw.gov.au

Draft Hawkesbury Rural Lands Strategy

Dear Madam/Sir

The Advisory Committee for the Greater Blue Mountains Area World Heritage property (GBMA) is jointly appointed by the NSW and the Australian Government Ministers responsible for World Heritage to provide advice on the protection, conservation, presentation and management of the GBMA and issues concerning surrounding land uses that have the potential to impact on the area.

World Heritage is the designation for places on Earth that are of outstanding universal value to humanity and as such, have been inscribed on the World Heritage List to be protected for future generations to appreciate and enjoy.

World Heritage listing is the highest level of international recognition that may be afforded to an area and the Greater Blue Mountains Area is one of twenty World Heritage properties in Australia including Uluru, Kakadu and the Greater Barrier Reef. The Outstanding Universal Value of the GBMA relates to ongoing ecological and biological processes and significant natural habitats for the conservation of biodiversity including many rare and threatened plants and animals.

Thank you for the opportunity to provide comment on the draft Hawkesbury Rural Lands Strategy. Please note the attached map of the GBMA indicates the Hawkesbury LGA contains over 161,000 hectares of World Heritage listed national parks, which is over 58% of the LGA. The Hawkesbury LGA makes up about 15% of the total World Heritage area, the second largest area of the twelve LGAs that connect across the property.

The Advisory Committee notes reference to the GBMA in the draft Hawkesbury Rural Lands Strategy is only made in relation to the Greater Sydney Region Plan and is not referenced throughout the document when in fact it should be acknowledged and celebrated. The Advisory Committee recommends any planning for the Hawkesbury LGA must take into account the shared responsibility for managing and protecting the GBMA and benefit to wider community from World Heritage listing.

The Greater Blue Mountains World Heritage Area Strategic Plan¹ (the Plan) provides broad principles for the integrated management, protection, interpretation and monitoring of the World Heritage property. The Plan identifies that management of the adjacent areas needs to be consistent with the protection of the World Heritage values. The Plan identifies that "*Councils of the local government areas adjoining the GBMWHa will play a key role in implementing the GBMWHa Strategic Plan.*"

The ten key management principles outlined in the Plan include *Integrity* and *Major impacts related to urban and industrial development*. The potential for impacts on the integrity of the GBMA arise largely from its long and complex boundary and large number of adjoining landholders and land uses. Therefore, the Plan confirms that "*complementary management of adjoining land by both private landholders and government agencies is critical to maintenance of the area's integrity.*" The Plan also recognises the importance of ensuring that "*adjoining land uses are compatible with the conservation and presentation of World Heritage values.*"

¹ The GBMA Strategic Plan is available from <https://www.environment.nsw.gov.au/research-and-publications/publications-search/greater-blue-mountains-world-heritage-area-strategic-plan>

Management responses in the Plan relevant to the draft Hawkesbury Rural Lands Strategy include:

Section 1.6: *“Provide ongoing and proactive input to the establishment and implementation of effective local government planning and land management controls for land adjacent to the GBMA.”*

Section 2.3: *“Work with local councils to develop suitable local and regional planning instruments (e.g. Local and Regional Environment Plans) for areas adjacent to the GBMA.”*

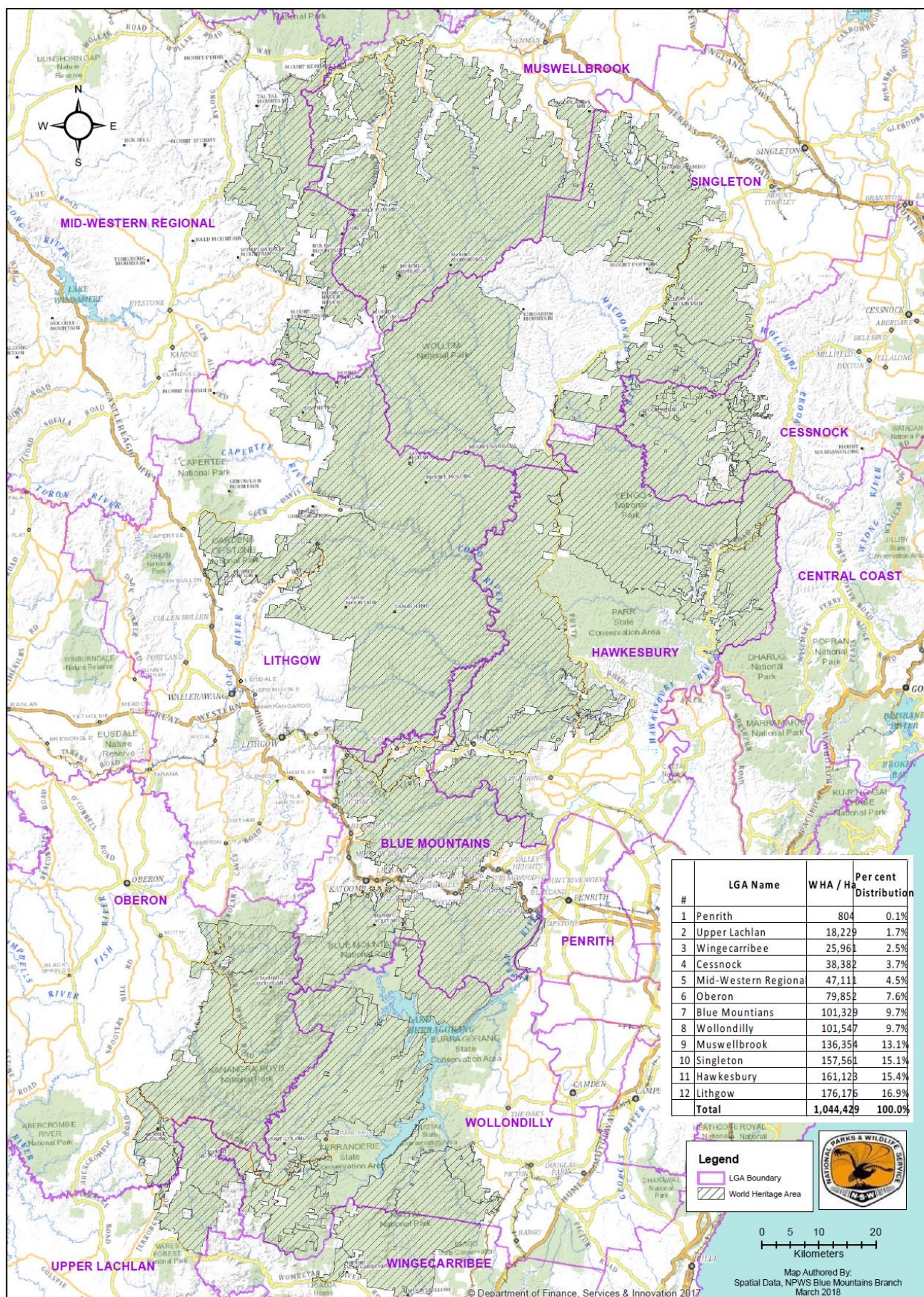
Section 3.5: *“Encourage and assist local councils to develop suitable statutory controls in areas which may impact on the GBMA to prevent the spread of weeds and introduced animals into the GBMA.”*

The Advisory Committee recommends the Hawkesbury Rural Lands Strategy include recommendations for planning adjacent to the GBMA, including prevention of intensification of land subdivision. recognition of bush fire hazards, development within catchments flowing into the area, and potential for weeds and feral animals to be introduced into the area from private land. Aboriginal cultural heritage, which is a key attribute of the GBMA and of the rural landscapes of the LGA, should also be acknowledged and considered.

[REDACTED]

15 February 2021

LOCAL GOVERNMENT AREAS ACROSS THE GREATER BLUE MOUNTAINS AREA WORLD HERITAGE PROPERTY



From: [REDACTED]
To: [Hawkesbury City Council](#)
Subject: Draft Rural Lands Strategy
Date: Tuesday, 16 February 2021 11:32:41 AM

Hello Andrew,

I have read the Draft Rural Lands Strategy and am concerned about the lack of communications to the broader community as this applies to the large proportion of land holders in the Hawkesbury.

The recommendation to change the zoning at my property at [REDACTED] Yarramundi from RU1 to RU2 severely reduces the permissibility with consent.


Previous correspondence sent to Council on 23/10/2015 from Montgomery Planning Solutions in relation to our property and rezoning was not supported by Council.

Will the minimum lot size be amended as well to reflect the reduction in permissibility for proposed zoning?

I would like to be notified of any updates regarding this matter.

Regards

[REDACTED]
[REDACTED]
[REDACTED]



General Manager
Hawkesbury City Council
PO Box 146
WINDSOR 2756

council@hawkesbury.nsw.gov.au

Dear Madam/Sir

Submission – Draft Hawkesbury Rural Lands Strategy

I wish to make a submission in relation to the Draft Hawkesbury Rural Lands Strategy currently on public exhibition.

I have reviewed the draft strategy and am concerned at the inadequate consideration given to significant issues for future planning of the rural areas of the LGA, specifically provision of infrastructure, climate change, biodiversity and the protection of the Greater Blue Mountains World Heritage Area.

The draft strategy either fails to acknowledge these issues, or considers them in a superficial way, that is not integrated in future strategic directions for land use planning. Of particular concern is that extensive information on biodiversity for the LGA has been excluded from the strategy with the comment that “in order to protect biodiversity values of the rural landscapes, it is first necessary to understand the significance of the biodiversity” (Section 6.10).

A rural lands strategy that does not fully take into account these key issues adequately will not be consistent with the objectives of Sydney Metropolitan Planning Policies. Specific comments that should be incorporated in the strategy are as follows:

Infrastructure

1. The future of rural areas is dependent on provision of services such as roads, electricity, water, communications, bush fire protection, and health. In particular, roads are expensive to provide and maintain. In general, provision of services in rural areas is expensive for the community and should be a key consideration when increasing further development.
2. In particular, agricultural industries rely on efficient communications, roads and support facilities which may be impacted on by residential development in rural landscapes.

Climate change

3. The strategy does little to acknowledge the importance of rural areas within the Hawkesbury LGA for retaining and sequestering carbon, and the community benefits of preventing further vegetation clearing that follows increasing subdivision of land.
4. Climate change impacts affecting the provision of infrastructure, and increasing the vulnerability of rural areas to bush fires represent a significant issue for long term spatial planning.

Biodiversity

5. The strategy does little to acknowledge or protect significant biodiversity values and to prevent continuing biodiversity decline within the Hawkesbury LGA.
6. Extensive information on biodiversity, biodiversity values and conservation needs outside the national park estate has not been referenced in the report and represents a major omission, since biodiversity will significantly affect future land use.
7. Maps 4.5 and 4.6 are inadequate to describe biodiversity values. For example, an explanation must be provided of ecologically significant vegetation, and why threatened ecological communities are not considered significant.
8. Essential biodiversity and habitat connectivity across the LGA is not considered. Reference should be made to *Hawkesbury City Council Wildlife Corridor Plan: Guidelines for conserving biodiversity at the local government scale*, Prepared by Land & Environment Planning for Hawkesbury City Council in August 1996. Although the biodiversity information in this document has been extensively updated since this report, the planning and management principles recommended remain relevant and should be referenced.
9. Protecting biodiversity in the LGA is made more difficult by the inappropriateness of standard instrument zones applied in the local environmental plan.
10. One key recommendation of the strategy should be the application of regulatory vegetation development control plan provisions pursuant to State Environmental Planning Policy (Vegetation in Non-rural Areas) 2017, to require consent for clearing of native vegetation that will impact on biodiversity and habitat connectivity.
11. Particular importance needs to be given to the protection and improvement of koala habitat on private land within the LGA, and how this can be achieved.

Greater Blue Mountains World Heritage Area (GBMWH)

12. A significant proportion of the LGA is within the GBMWH, an area recognised as having outstanding universal values that require protection. It is therefore essential for land adjoining, and in proximity to the world heritage area to take into account and support the protection of these values.
13. The strategy should include recommendations for planning adjacent to the GBMWH, including prevention of intensification of land subdivision, recognition of bush fire hazards, development within catchments flowing into the area, and potential for weeds and feral animals to be introduced into the area from private land.
14. Aboriginal cultural and heritage, which is a key value of the GBMWH and of the rural landscapes of the LGA, should also be acknowledged and considered in the strategy.

Please ensure that the matters outlined above are taken into account in the finalisation of the draft strategy. Thank you for the opportunity to make a submission.

Yours sincerely



11 February 2021

DRAFT HAWKESBURY RURAL LANDS STRATEGY

Submission by:

[REDACTED]
[REDACTED]

Dear Hawkesbury City Council,

After only becoming aware of the above document on 8 February 2021 we have had a hurried look at the exhibit on show at Council.

There has clearly been an enormous amount of research put into this wide reaching strategy and we only wish to refer to bushfire hazard reduction as we understand that it will be used to “provide appropriate planning controls” affecting Hawkesbury rural lands.

We own 100 rural acres in Bilpin and we were impacted by the 2019-2020 mega fire. Fuel for the next fire is now growing at an amazing rate due to the wonderful rain recently.

We wish to be able to protect ourselves and our possessions by effectively reducing the fuel loads along our boundaries which largely front the Wollemi and Blue Mountains National Parks. Present regulations require us to undertake onerous applications to Council to simply protect our selves. This is in spite of the RFS telling us via their website that ***“It is every landholder’s responsibility to manage the bushfire hazards on their property”*** and ***“The simple rule is – if its your property, its your hazard and your responsibility.”***

.....
The DRAFT HAWKESBURY RURAL LANDS STRATEGY refers to bushfires a number of times. The following are brief extracts and our responses:

1. shows a coloured photo of bushfire prone areas with Bilpin in the High Risk Area.

Our response: Our properties are in these areas

2. *“The protection of the identified community assets is a key issue as is the preservation of biodiversity when considering the issue of bushfires.”*

Our response: Private and personal assets are equally important as ‘community assets’ and much of the so-called ‘biodiversity’ was absolutely obliterated in many areas in the latest fire.

3. *“It is also a function of the climatic conditions over the preceding years and the current fire season which in turn are impacted by climate change.”*

Our response: The existence and degree of climate change has not been factually established beyond argument and this claim is simply a matter of opinion.

4. *“Managing the bushfire risk is noted as the key factor in dealing with the bushfire hazard. One of the management options is risk avoidance and therefore land that is prone to bushfires should not be rezoned and subdivided where an adequate fire protection zone cannot be established.”*

Our response: The strategy appears to accept the danger of bushfire, particularly in Category 1 areas, but gives no attention to reducing the fuel load and in particular allowing landowners to protect themselves without first gaining unreasonable consents.

5. *“The RFS have defined the categories of bushfire prone land as follows “Vegetation Category 1 is considered the highest risk for bushfire. It is represented as red on the bushfire prone land map and will be given a 100m buffer. This vegetation category has the highest combustibility and likelihood of forming fully developed fires including heavy ember production.”*

Our response: In spite of this RFS reference to a 100m buffer in our Category 1 area we are unable to clear a 10 metre buffer without unreasonable and unacceptable approvals.

.....

We fully understand the fear that some unscrupulous landowners may abuse any freedoms given and that there is understandable hesitancy in allowing landowners to be able to hazard reduce with less/no regulation however we submit that any abuses that might arise would be far, far more preferable than another catastrophe like the 2019 – 2020 mega fire. **If we have too much fuel we will have too much fire.**

We would like to re emphasise the importance of Council making recommendations to the DPIE to allow the new 25 metre rule to apply to Hawkesbury rural properties at least in the Category 1 zoned areas.

Can we request Hawkesbury City Council to please make this recommendation to the DPIE and the Emergency Services Minister?

Yours sincerely,

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

From: [Your Hawkesbury Your Say](#)
To: [Britt McNally](#); [Hawkesbury City Council](#); [Melissa Barry](#)
Subject: Anonymous User completed Submission - Draft Rural Lands Strategy
Date: Monday, 8 February 2021 12:46:59 PM

Anonymous User just submitted the survey Submission - Draft Rural Lands Strategy with the responses below.

Full Name

[REDACTED]

Email Address

[REDACTED]

Submission

I would like to add my support for the conservation of biodiversity and food producing farmland within the Hawkesbury. So much of the Dydney region is now concrete and bricks, it is necessary to provide some contribution to open green space and to counter act the "heat sink" effect of so much over development. The Hawkesbury LGA provides opportunities for this. In the future, food security may become a very pressing issue and I would like to see at least part of the LGA be maintained for food production for the Sydney region. While not opposed to development as such, I am very opposed to development unsympathetic to the environment. I live close to the Hill LGA intensive development area and have seen the unfortunate consequences of poor planning and development at all costs. Very little green space is left, buildings are identical with no character and apartment blocks simulate dog crates stacked upon each other. Sadly much of this has occurred on the very best agricultural land. Areas of poor soils, lacking in water, waste land etc are better suited to intense development than the best quality land. I am totally opposed to further development of the flood plain as this is best used for agricultural and the costs of repair after a flood event to infrastructure are wasteful. The experience of other countries is flood plain retreat as a less costly form of progress based on actuarial studies than continuous insurance payout. I suspect the same may be said of bush fire prone areas. I would support the Hawkesbury LGA keeping a balance of mixed landuse. Small areas of intense residential development, mixed with stand alone residences, mixed with small acreages accommodating rural residential, through to larger land holdings. Hawkesbury should not become a one size fits all. In my community, there is an equal split between those who have moved to the Hawkesbury for its semi rural lifestyle and associated amenities (possibly younger people) and those who are post retirement and wanting to sell off their land to developers to cash in on the windfalls seen in other LGA areas. I feel this is very sad. There should be room for a mix of both. Part of the problem is the vacillation of the State Govt in gazetting areas for future development and associated timeframes. I attended meetings for the M9 corridor. The planners had done "desk maps" with no idea of local landuse or topography. Several alternate and much better routes were obvious but once pointed out, it was stated that alternatives were not under consideration. Until this is resolved there is uncertainty for all. People choose to live in the Hawkesbury LGA for a wide variety of reasons. I hope that all of these choices can be accommodated and it does not become a concrete jungle. There is huge potential for eco tourism and associated leisure, tourism, recreational activities which may benefit the local economy more than other options.

From: [Your Hawkesbury Your Say](#)
To: [Britt McNally](#); [Hawkesbury City Council](#); [Melissa Barry](#)
Subject: Anonymous User completed Submission - Draft Rural Lands Strategy
Date: Friday, 18 December 2020 1:01:29 PM

Anonymous User just submitted the survey Submission - Draft Rural Lands Strategy with the responses below.

Full Name

[REDACTED]

Email Address

[REDACTED]

Submission

rural land submission, I would like for the rural lands not to be exploited any further than it already is in north Richmond Marsden park etc, the infrastructure cant handle any more people for high rises or for mass produced housing ! am appalled by it all and totally against it!!!