



Hawkesbury City Council

Attachment 2 to item 258

Hawkesbury Employment Lands Strategy -
Submission review by
SGS Economics and Planning.

date of meeting: 9 December 2008
location: council chambers
time: 5:00 p.m.

1 Hawkesbury Employment Lands Strategy-Submissions

The Hawkesbury Employment Land Study was placed on public exhibition during October. Nine submissions were received with four of these being from Montgomery Planning Solutions (MPS) on behalf of 4 different clients:

1. Montgomery Planning Solutions (MPS) – on behalf of the Tolson Group
2. Glenys Gilling
3. Falson and Associates
4. Daniel McNamara Planning Solutions (DMPS)
5. Montgomery Planning Solutions- on behalf of Buldev
6. Montgomery Planning Solutions- on behalf of Keith Willoughby
7. Montgomery Planning Solutions- on behalf of Winten Property Group
8. Pirasta Pty. Ltd.
9. Tom Lonsdale

1.1 Summary of Issues

The following is a summary of the key areas of concern raised in the submissions. SGS's response to these issues has been presented following each summary. Matters not raised here were considered statements or comments to Council about council operations and as such a response was not provided.

Rezoning of Land & Suggested Land Uses

Three of the submissions (MPS on behalf of the Tolson Group, Keith Willoughby and the Winten Group) discussed the need to rezone certain areas within the Strategy's scope or suggested alternative land uses in certain locations. These rezonings differed in location and purpose. MPS on behalf of Tolson Group stressed the need to rezone land at Mulgrave to Industrial, in order to provide future security for mushroom substrate provision (no map provided).

The MPS submission, on behalf of Keith Willoughby was for a group of land holders near South Windsor (see map 1, Appendix A), who believed their land should have been included in the employment land study. It refers to Strategy 8, on development treatment for gateway areas, and believes this land should have a boulevard and higher amenity highway activities.

MPS, on behalf of the Winten Group disagreed with the suggested land uses for the South Windsor Gateway (Strategy 8). The strategy suggested 'motel, produce showroom, market' which were seen in the submission as possibilities, instead of an actual analysis

of suitable land uses. The submission stated that at an Ordinary Meeting, 29/5/2008, Hawkesbury City Council decided on other suitable uses:

- Food and Drink Premises
- Tourist and Visitor Accommodation
- Service Station
- Childcare Centre
- Information and Education Facilities

The submission states these should replace the suggestions in the strategy.

The mushroom industry was highlighted as an important industry by the MPS submission on behalf of the Tolson Group. It was seen to have been overlooked in the strategy in terms of economic importance to the region. The Hawkesbury supplies 78% of NSW mushroom production and employs 600 people directly and another 200 contractors.

SGS Response:

The land identified by the Tolson and Willoughby MPS submissions are not zoned for industrial or business land uses and as such are largely outside the scope of this study. SGS has provided a paragraph in the introduction setting out the scope of the study and has also recommended a strategy action that a detailed analysis of employment land uses on non-employment land use zones be undertaken.

There is a strong case that the land in the Willoughby submission should be considered for an industrial zoning to recognise the existing activities, and protect the waste depot function at this location. We are less convinced this land would constitute a legitimate extension of the gateway site which is focussed on the intersection of George Street and Blacktown Road. *SGS seeks Council officer advice on these issues.*

SGS seeks Council officer advice on the comments made by the Winten Group regarding the suitable uses discussed at the ordinary meeting mentioned in the submission.

SGS has included some information provided by the Tolson Group about the mushroom industry as a small case study within a text box to provide an example of the contribution of agricultural production to local and regional economy. Dealing with these activities should be the subject of a separate study.

Further Analysis & Strategies

According to submissions from Falson & Associates and MPS on behalf of the Tolson Group, the Strategy required further research and analysis. The Falson & Associates submission considered the Strategy to be flawed as it was not preceded by other extensive research for a residential strategy or a rural lands/ agriculture strategy. It was not seen as possible to create an Employment Land Study in isolation of what is likely in terms of population growth, housing needs, tourism and agriculture.

The MPS submission, on behalf of the Tolson Group believed that further study is needed on employment within the agriculture sector to identify those jobs related to actual growing, compared to processing of primary produce. Research should be undertaken for the suitability and viability of the agricultural land within the LGA.

Although agriculture is a significant industry in the area, the MPS submission, on behalf of Builddev, pointed out that it has been declining and this should be considered in this context.

A submission received by Daniel McNamara Planning Solutions believes the Mulgrave investigation area should be extended as far south as Bandon Road (see map 2). Written on behalf of the Vineyard Landowners Group, it focussed on the need to expand the Mulgrave Investigation site to build a deeper employment base in the LGA, by servicing new residential populations and new businesses elsewhere in the region.

SGS Response:

SGS supports submissions that a wider study must be undertaken of employment landuses on non-employment zoned lands particularly rural lands.

The industry sector analysis finds that despite the small number of jobs provided by the agricultural sector, it has specialisation over the subregion and wider Sydney area. This is an important attribute of the local economy and one that needs to be built on and investigated as part of the wider study called for in the submissions. The importance of the agricultural sector is assessed in this light.

SGS has included lands at Mulgrave for investigation as a short term option for re-zoning to industry. This would be a substantial addition to supply in the context of a current notional over-supply (through recognising there are servicing and development constraints). The current investigation area is well located near the station and with road access to the existing industrial area. The Bandon Park area would be worthy of consideration in the future if the current investigation area was developed and provided to be successful.

Tourism

An issue perceived by the Glenys Gilling submission was the lack of consideration of non-residential uses on Rural Zoned Land, particularly in relation to tourism. Rural tourism and associated enterprises should be encouraged to boost the economy. Council should have incentives within its planning controls. The Gilling submission stressed the use of the Community Title Act as a means of attracting investment for tourism infrastructure. The Falson & Associates submission, which discussed the need for the Employment Lands Study to be based on more research and strategies, also believed there is more research needed on tourism in the area.

SGS Response:

SGS supports submissions that a wider study must be undertaken of employment landuses on non-employment zoned lands particularly rural lands. This should include analysis of tourism and agricultural landuses.

DA's with Council

Two submissions were on behalf of people who had also submitted DA's to Hawkesbury City Council, MPS for the Winten Property Group and Tom Lonsdale's submission. The Lonsdale submission did not have concerns with the strategy but was more focused on Council's handling of their development application. The submission did note the Strategy proposed a potential 'bulky goods site' on their land near Windsor Station, which was not supported by the landowners. Lonsdale, after consultation with several real estate agents, believed increased residential density was best for the site.

The MPS submission, on behalf of Winten Property Group, believed that many of the points raised within the strategy favoured their DA in terms of generating employment and supported the strategy actions to have the land at the corner of George Street and Blacktown Road, South Windsor rezoned.

SGS Response:

SGS has reviewed the draft findings and considers that the 'retail bulky good' proposed landuse may be inappropriate given the supply of Business (3b) land located at Mulgrave and access constraints at this location. SGS has removed this from the proposed strategy for Windsor Station. However, given the lack of additional supply potential in the existing business zones in the Windsor town centre, it may be appropriate to increase the provision of retail and commercial floorspace in the Windsor Station precinct subject to managing environmental issues (aircraft noise and flooding).

Support for certain Strategies

The MPS submission, on behalf of Builddev, stressed Strategy 4 as a priority for Council, which considers the future land at Clarendon for a high amenity office and business development. It provided further information and reasoning as to why Clarendon should be high priority for HCC, including

- A current mismatch of supply and demand
- Clarendon possesses characteristics of a strategic business park
- The occupations with the greatest potential to improve self containment.

The MPS submission, on behalf of the Tolson Group showed support for Strategy 6, in relation to understanding the economic role of agriculture and agricultural industries. This supports other submissions that raised the need for more research in this area.

SGS Response:

SGS's demand/supply analysis finds that though there is capacity for increased retail and commercial floorspace in Richmond and some of the smaller centres, this floorspace may not be suitable for higher order office uses due to size and configuration issues. SGS was asked to provide an assessment of a proposed business park located at Clarendon and finds that the proposal has merit and as such has suggested that the Clarendon location may be suitable for such a use. SGS has recommended that certain principles must be applied to any proposal for a business park in this location to preserve the amenity of the locality and additional principles will be included to ensure that the character of this development respects the self contained nature of the existing town centres.

Detailed Submissions

A submission by Pirasta Pty. Ltd. made a detailed submission which queried methodology and assumptions particularly regarding retail floorspace supply and demand. Submissions from Tom Lonsdale and MPS, on behalf of the Winten Property Group were also unsure of certain terms within the strategy including 'Bulky Goods Site' and 'produce showroom'. Clear definitions would be appropriate.

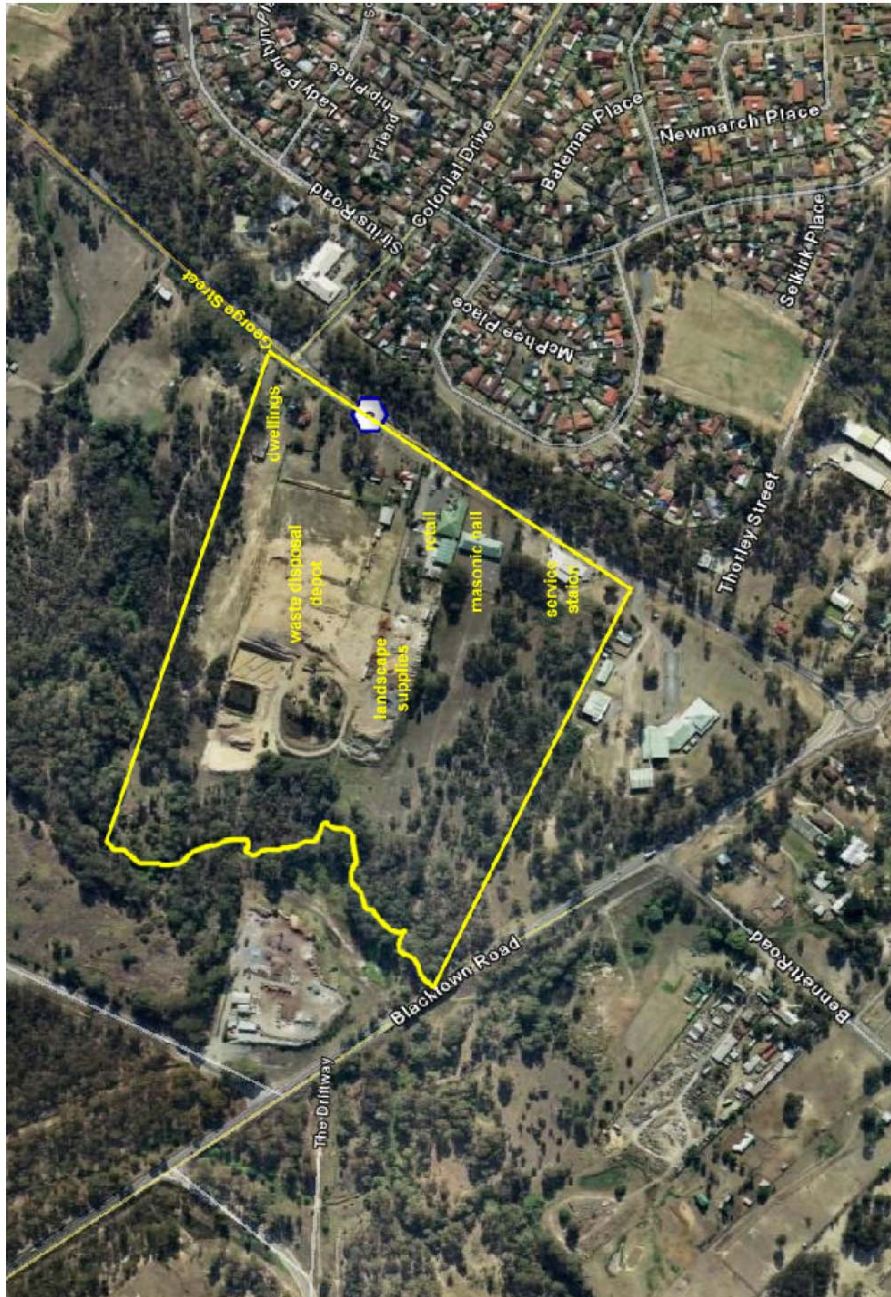
A detailed submission from Falson & Associates queried the scope of the study and suggested that the study should not be undertaken without assessment of future dwelling supply.

SGS Response:

These detailed submissions were addressed as shown in Appendix X.

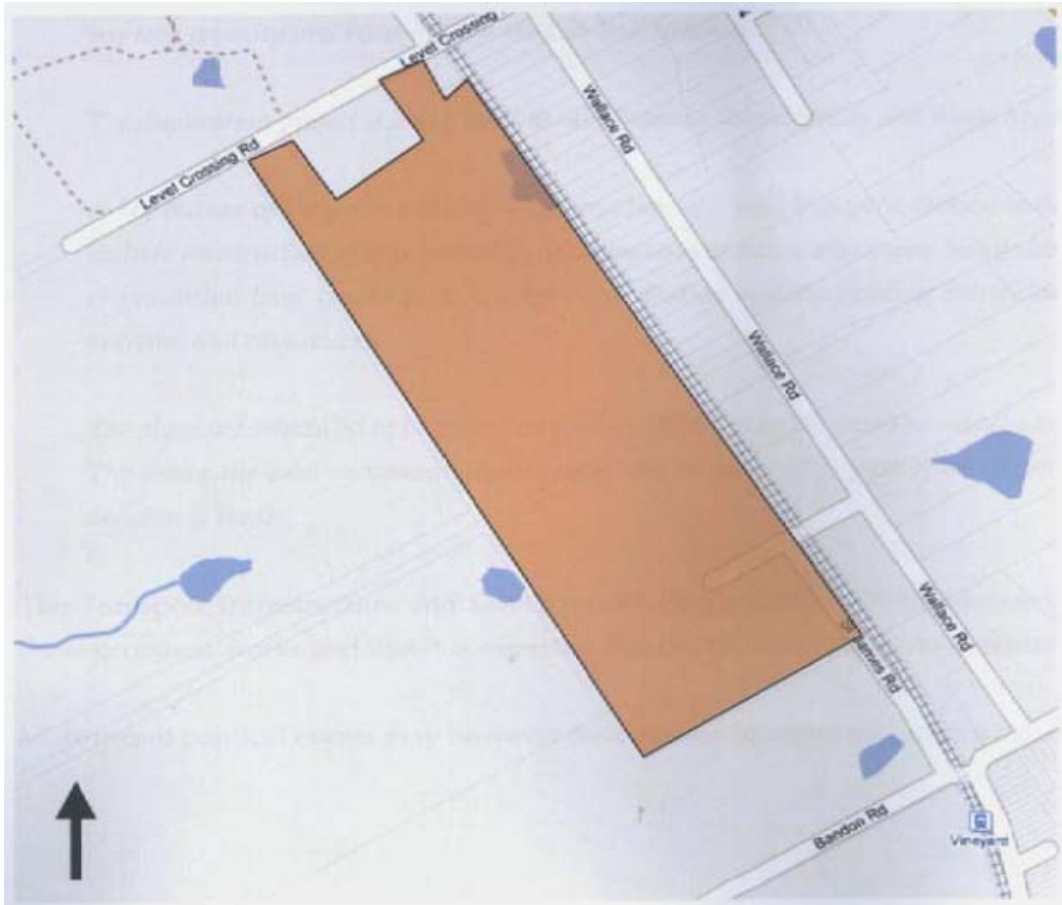
Appendix A: Maps

Figure 1. Land related to MPS Submission on behalf of Mr Keith Willoughby.



Source: MPS 2008

Figure 2. Land related to DMPS Submission addresses and was submitted on behalf of owners of land at Vineyard.



Source: DMPS 2008

Appendix B: Response to detailed submissions

Pirasta Pty Ltd

Reference	Preamble	Comment
Page 13	Scope of study focus	Taking account of the centres typology in Table 4 Page 22 / 23, reference to Town Centres, Villages, and Small Villages is appropriate for consistency. The extent of change needs to be reflected in the Executive Summary Page 1 Intro to maintain consistency within the Report.
Page 16	Population Change	Given predominate age band of 35-44 and 5-15 and the identified household formation of 2.82 given at Appendix D it would seem inappropriate to apply 2.82 by annual personal expenditure on shopfront retailing to derive a total annual catchment expenditure on shopfront retailing as 5-15 year old not having access to money for expenditure
Page 17	Employment	The employment categories listed total 58% and the remaining 42% categories not disclosed?
Page 23	Table 4	<p>Town Centres: The description better portrayed by stating: '.....at least one or two supermarkets.....' specifies one or two supermarkets</p> <p>Small Villages: Given that residential contiguous to Mulgrave is confined to one quadrant (McGraths Hill) thus locationally would prove difficult for 800 houses (minimum) to be within 10 minutes (minimum) walk distance criteria, Mulgrave may not qualify for this status.</p> <p>The Description column warrants better consistency description between each of the relevant roles. Eg</p> <ul style="list-style-type: none"> Town Centre: makes reference to pleasant residential and pedestrian environment but not mentioned for Villages, Small Villages or Neighbourhoods. Villages: make reference to daily shopping but not mentioned for Small Villages Villages: make reference to enjoyable public environment, good links to surrounding neighbourhoods but no mention for Town Centres, Small Villages or Neighbourhoods. Small Villages: makes reference to walk distance to prescribed residential dwelling numbers but comparable measures not mentioned for Town Centres, Villages or Neighbourhoods. Neighbourhoods: specifies shop numbers, access to public transport, child care centres but no mention for Small Villages or Villages in the case of shop numbers and child care.
Page 30	All employment lands to be retained for industry	Reason for the exclusion of commercial and retail employment lands needs clarification to align with HELP identifying employment land use zones as industrial, business and special uses.
Page 36	Increasing Energy and Fuel Cost	For context the key goals should be increased to include: minimising trips in aggregate (by aiming for containment of retail diversity enabling the optimum scope for visitation to a central locality)
Page 47	Table 10	The % split by sub sectors seems not to tally.
Page 50	Table 12	The % split by sub sectors seems not to tally.
Page 51	Table	The % split by sub sectors seems not to tally.

Reference	Preamble	Comment
Page 77	Windsor	<p>The commentary offered is deficient in describing the existing shopping centres of including:</p> <ul style="list-style-type: none"> Windsor Riverview with 8,000m² NLA including 3,800m² (Coles), 35 specialty shops and 330 car spaces with 3 hour limits between 8am and 10pm enabling 4.5 parking turnovers per day. Target with 1,800m² NLA and 50 car spaces, <p>A Woolworths site (under development) with 4,700m² NLA, 12 specialty shops and 150 car spaces, A 2,000m² NLA site under rezoning for 1,500m² NLA for supermarket and specialty shops and additional car parking.</p> <p>Collectively the recent and coming supply compounds the economic multiplier effects with diversity of attractions enabling increased retail takings and corresponding retailer localised expenditures within the Town Centre.</p>
Page 93	Table 18	<p>Business 3(a) 283,527m² / ha combined metric not understood Business 3 (b) makes reference to both m² and ha and inconsistent</p>
Page 96	Figure 71	<p>For better locational context, the Table Row of Features needs to include: proximity to residential, dwelling numbers, proximity to surrounding Town Centre, Village, Small Village or Neighbourhood Centre The inclusion of ANEF contours seems not relevant to employment lands, given the absence of residential amenity impacts. The PMF abbreviation warrants introduction for readership understanding. Centre typology warrants inclusion for the Precincts of Windsor Station and Mulgrave</p>
Page 103	Business Supply	<p>Unlike industrial and office commercial, retail needs to reflect nexus with passing trade (a combination of residential proximity and scale, and the value of retail synergistic effects, without which a weakening of the economic multiplier effect (from reduced retail takings and consequential decline in retail operator localised expenditure).</p>
Page 107	Survey Catchment	<p>Participation in consultation excluded the Windsor based Pirasta, operating 8,000 m² NLA with a Coles supermarket and 35 specialty shops and a 4 year project initiative for the rezoning of contiguous land for an additional 2,000m² NLA for retail purposes (all with Council support). Given the quality of survey input opportunity foregone, it would appear the survey methodology or execution or both, was partial and incomplete.</p>
Page 108	Chapter 7.4	<p>second para; reference is made to attributes including proximity centres and population concentrations but excluded from page 96. See comment against page 96 for comparison.</p>

Reference	Preamble	Comment
Page 110.	Retail Demand	<p>Last para makes reference to Appendix D which shows 2.82 people per dwelling (household formation). Assuming the 2.82 includes children; it would appear incorrect to include for personal expenditure calculations. The formula warrants adjustment.</p>
Page 114	Item 8 in unnumbered Table.	<p>High amenity highway related enterprises warrants definition to gauge the differentiation of industrial /office and retail employment outcomes and linkage to zones 3 and 4 spatial allocations.</p>
Page 123.	Strategy 8 second bullet point	<p>As for Page 114 comment, but noting the absence of specific reference to office and retail. Definition would assist clarity of intent.</p>
	Table 25	<p>The Key Requirements / Criteria column needs to reflect the appropriate measurable specifics as identified in Table 4 Page 22 / 23 for consistency specified information</p>
Page 124.	Table 25	<p>Retail Main Street needs to reflect both Villages and Small Villages in the Suitable Precinct column.</p>
Page 126.	Proposed land use zones...	<p>In respect to the distribution of employment land uses, the second bullet refers to medium density residential and clarity is warranted to demonstrate the inclusion of residential referencing in an employment land use document.</p>
Page 140.	Table 29	<p>Calculations need to reference the input sources for verifications. The identified gap between Windsor (-14k) and Mulgrave (+56k) seems surprising.</p>

SGS Response

Pirasta Reference	SGS Response
Page 13	Reference to scope study amended to add that the Metropolitan Strategy and Subregional planning forms the framework for the study.
Page 16	Expenditure is expressed by using the NSW average annual personal expenditure. As an average it takes into account the variances across age groups in relation to expenditure

	trends.
Page 17	Reference added to graph in Appendix which shows the full analysis of employment by industry sector.
Page 23	Direct text from Subregional Strategy added to table with appropriate sourcing. Comments on these centres and what they include and exclude should be directed to Department of Planning.
Page 30	Employment land is described in the Subregional Strategy includes the traditional industrial areas and business and technology parks for higher order employment. They incorporate light industries, heavy industry manufacturing, urban services such as concrete batching plants and waste management, warehousing and logistics and higher order technology-based activities.
Page 36	This is supported by SGS and text has been amended to include this comment.
Page 47	Table changed to show top 5 sub-sectors with full table in Appendix.
Page 50	
Page 51	
Page 77	Windsor Riverview retail floorspace information added to text and sourced.
Page 93	Error amended. Reference to business floorspace in m2 and industrial land shown in ha. This is a summary and the units are appropriate.
Page 96	Glossary of terms added as an Appendix. Windsor Station outside of the buffer area for South Windsor and only part of the Mulgrave precinct is located within the centre buffer (see figures in section 6).
Page 103	Statement
Page 107	Scope of survey catchment decided by Council who found that sending letters addressed to "To the tenant" resulted in many return-to-sender mail.
Page 108	Noted
Page 110	Expenditure is expressed by using the NSW average annual personal expenditure. As an average it takes into account the variances across age groups in relation to expenditure trends.
Page 114	Text added to clarify intent of this phrase.
Page 123	Action text amended to better reflect intent (similar to that for Bells Line of Road)
Page 124	Text amended to address this issue.
Page 126	The proposal is to provide a mainstreet treatment to Riverview Street, North Richmond. This requires some intensification of residential development around and on the proposed main street. It was considered that North Richmond is a candidate for some intensification and the Subregional Strategy identifies that land North of the river is more appropriate for residential intensification. The proposal pre-empted a housing strategy however the justification for the proposal is sound and would obviously be reviewed by any housing strategy prepared by Council.
Page 140	<p>The supply gap for Windsor is not surprising considering that the Windsor centre is a highly constrained centre. The notional supply analysis has removed heritage lots from the analysis as it was considered that these sites would not offer significant additional floorspace capacity. As such the notional supply is based on non-heritage listed lots in the Windsor centre. These lots are currently developed to capacity.</p> <p>Mulgrave's high floorspace capacity is only for the business zoned land (Business 3(b)) with frontage to Windsor Road. Few lots zoned 3(b) have been developed to their full capacity which explains the high amount of floorspace available.</p>

Glenn Falson, Falson and Associates

Submission Issue/s raised.	SGS response
<p>From the outset I believe that the Draft Strategy is flawed in that it has been produced in the absence of other inextricably linked research that is required. This research includes a residential strategy and also a rural lands/agriculture strategy. Sub-sets of these strategies should also cover tourism related activities/opportunities.</p>	<p>Many of the comments in this submission refer to additional work required that would be outside the scope of the brief.</p> <p>SGS has taken into account where residential intensification needs to be focused according to the directions of the Subregional Strategy as well as the character of each precinct and its future floorspace offer.</p>
<p>I indicate the above for I can't see how any Employment Lands Strategy can be an accurate indication of what is required in the future if it is done in isolation of what is likely in terms of population growth, housing needs, tourism, agriculture etc. The Draft Strategy does acknowledge that other studies need to be carried out but makes some basic assumptions that I don't believe can reasonably be made given the current facts.</p>	<p>Population growth is one factor, amongst others, in the employment projections prepared by Department of Planning (we used the Draft North West Subregional Strategy employment targets as the basis for the work).</p>
<p>1. The Draft Study focuses on employment activity areas in the southern part of the LGA (p1). Any agricultural and tourism assessment of the LGA would show that employment activities, whilst of lesser numbers are widely dispersed through other areas of the LGA, not just its southern part.</p>	<p>SGS supports the preparation for a wider study that assesses land uses on non-employment zoned lands and forecast demand on such land. A recommendation to this effect has been included in the report. The scope of the current report does not include non-employment zoned land.</p>
<p>2. The Draft Study acknowledges that State Planning policy offers little for the Hawkesbury LGA (p1). In times of old Council used to be an active lobbyist of politicians and government departments. Things such as the Bligh Park residential area, water provision to Glossodia/Wilberforce/Freemans Reach, and the electrification of the Richmond/Blacktown rail line would not have occurred without active lobbying. My perception is that this does not happen now or at least not with as much vehemence. There is scant mention in the Draft Study of how to secure growth. There should be a strategy of how to procure this, not just a timeline for recommended action.</p>	<p>The study strategies provide the actions to secure growth in relation to employment lands planning. Given that Hawkesbury is projected to experience a decline in jobs to 2031, the strategy presents a scenario where the employment capacity target is reached. This is therefore at least a partial strategy for growth.</p>
<p>3. Existing constraints of the Hawkesbury are acknowledged. Long term strategies to address these constraints are required. Why are there no future upgrade programs for major arterial roads or flood free routes (p1)?</p>	<p>Such upgrades would be part of analysis for investigation areas proposed. Existing use of industrial and business zoned lands are considered to be well-served by road. SGS has suggested Council lobby for</p>

	improved public transport servicing. Detailed road infrastructure upgrades were not within the report scope.
4. The fact that government policy does not elevate any Hawkesbury centres to 'strategic' status is understandable given the flood and dispersed nature of the Hawkesbury settlements (p1). No Hawkesbury centre will ever be elevated to a higher order due to flooding constraints. Given the location of surrounding higher order centres such as Rouse Hill, Castle Hill, Penrith and Blacktown there will always be escaped expenditure. Hawkesbury should concentrate on its attributes. Its charm is partly due to its flood plain and dispersed nature. It is a series of towns and villages set in a rural hinterland. This is what Macquarie promoted 200 years ago. Why not promote this now? There have been many studies done in the past that have recommended this. There should be a strategy for achieving this. Consolidation of towns and villages, sensible rural development, increasing tourism opportunities and even encouraging agricultural/tourism developments as has happened with vineyard/tourism development in the Hunter, Orange and Mudgee. The reality is that the Hawkesbury is ideally geographically located to exploit short trip tourism from Sydney. Decreasing leisure time and increasing petrol costs should lead to the Hawkesbury as being in a prime location with significant advantage.	SGS supports the need for wider assessment of employment landuses including tourism and agriculture and has included a recommendation to this effect.
5. The projected dwelling target of +5,000 dwellings to 2031 is used as the base data for the projection of the need for a further +3,000 jobs (p1-2). I query whether this is an acceptable basis on which to make recommendations. The reality is that new dwelling numbers have been decreasing for many years. This is mostly due to a lack of zoned and serviced land of all types. The Draft Study supports the need to procure additional infrastructure and this is laudable. However if current trends of declining population and low dwelling construction continues then the 5,000 new dwellings are not going to come to fruition and the need for 3,000 jobs will not exist. The projections of State Government for the Hawkesbury need to be critically examined for to date recent trends have not borne out these projections.	SGS's employment strategy should be reviewed in light of any housing strategy prepared by Council.
6. I know there is a need for additional dwellings of all types. My children are at the stage where they require separate housing. They have had difficulty in obtaining accommodation and have moved from the Hawkesbury. I hear this story elsewhere. The fact is that even if there is no population increase there is a need for additional housing. This is due to decreasing household sizes and the need for different and often smaller	Population growth has been taken into account through the use of employment projections prepared by Department of Planning which are based on population growth as well as other factors.

accommodation. If there is no housing strategy then there can be no proper assessment of the likely future population. Without knowledge of future population there can be no proper employment strategy.	
7. As indicated housing needs are changing. There is an ageing population but there is no local ageing strategy. Areas up and down the coast where “baby boomers” are retiring have built up extensive service industries around an ageing population. Services such as trades, medical facilities, community clubs etc. There is no reason why the Hawkesbury could not have a positive ageing strategy that encourages an industry base support. An examination of any of the aged person’s homes within the Hawkesbury reveals that there are no vacancies and long waiting lists. Seniors Living proposals have not been actively encouraged for a variety of reasons.	Statement
8. At page 2 is indicated key regional assets and economic drivers but the RAAF, agriculture and tourism is not mentioned.	This is an error as RAAF has been mentioned elsewhere as a key asset. The table has been amended to show RAAF as a key asset.
9. Minimising vehicle trips is laudable (p2). There will always be a higher proportion of vehicle trips/person in the LGA due to its dispersed nature. Promotion of small localised bus operators might be an appropriate recommendation. Certainly consolidation of existing towns and villages is required with prime focus on those with transport nodes.	Statement
10. I agree that much of the Hawkesbury’s land is valuable for food supply (p3). However much of it is not. Much of the rural land is not needed for agricultural production (or at least not in any intensive way) but is often needed for amenity and visual buffer between the lowlands and the escarpment and as a backdrop to Sydney generally. However the perceived current blanket belief that all rural land should be kept for agriculture does not follow from any reasonable soil/land analysis. There is no doubt that the alluvial flood plains are highly fertile agricultural lands and agriculture should be encouraged. There are other pockets of good orcharding land but the majority of land zoned as Mixed Agriculture under Council’s LEP is not good farming land. My view is that it is timely to have a proper agricultural analysis of the LGA. On land that is not identified as being high class agricultural land why not encourage other forms of development that would spin off the agricultural base. Tourism accommodation and agricultural rural industries come to mind.	SGS supports the need for wider assessment of employment landuses including tourism and agriculture and has included a recommendation to this effect.

<p>11. Transport costs for food production are increasing (p3). There is an opportunity for the Hawkesbury to have regional cold food storage facilities not only for food produced here but in surrounding districts. The growing North Western Sector of Sydney, the proximity of the M7 and M2 create opportunities for the Hawkesbury to become not only part of a Sydney “food bowl” but also a Sydney “food storage and distribution” centre. Lobbying to have a proper regional road link between Bells Line of Road and Richmond/Blacktown Road and Castlereagh Road would assist the Hawkesbury LGA and also adjoining LGA’s and create an ideal food distribution epicentre.</p>	<p>The economic analysis found that Hawkesbury employment lands are at a disadvantage due to the oversupply of serviced land with direct access to M7/M2. The strategy therefore seeks to open up underutilised industrial land in the LGA.</p>
<p>12. The Hawkesbury has traditionally had a diverse population profile and this is one of its positive characteristics. It has also traditionally had a high proportion of executives residing in the area. Developments such as headquarters for rural and regional based activities could be encouraged. Rural Press complex comes to mind. This is not situated on prime agricultural land but takes advantage of good road location. Council should again become active in encouraging such development. Opportunities should be followed when they appear.</p>	<p>SGS has recommended that a business park development should be considered at Clarendon to provide head office and other higher order business activities.</p>
<p>13. I agree that further investigation is needed of employment use of non-employment land (p4). There is no mention in the Draft Strategy of home based workers. Home based work is becoming increasingly desirable but the Hawkesbury still has large areas that do not have high speed internet connection. Lobbying to have such provided should be a priority. Internet providers should be told of what is projected in terms of housing/employment etc. Perhaps if they have knowledge of a perception of a progressive and dynamic LGA they will be more likely to “roll out” their services.</p>	<p>Assessment of home based work was not within the scope of the study. A broader economic development strategy would include analysis of Home-based workers, the industries they work in what contribution they make to the local economy.</p>
<p>14. I have concern with the recommendation to have a “higher order” office precinct at Clarendon (p4 and p118). The Hawkesbury is comprised of a number of towns and villages set in a rural hinterland. In fact this was due to flooding and historically took place purposely with the 5 Macquarie Towns. Development of Clarendon as recommended would tend to join Windsor and Clarendon and thus contribute to each lose their separate identities. Further the rural approach to Clarendon forms the backdrop to the escarpment to the west. It is needed for visual catchment and amenity. It is also prime agricultural land and partly flood liable.</p>	<p>SGS’s recommendation to investigate a business park development at Clarendon also includes the need to develop principles to preserve the amenity of the locality. The issues raised are valid ones which should be considered in any more detailed consideration of this option.</p>
<p>15. I agree with the difficulty of developers being first in and having to fund up-front servicing costs (p4). Perhaps Council’s S94 Plan should be critically reviewed to account for an equitable reimbursement of funds from subsequent developers. I know that this is difficult but other Council’s have made reasonable</p>	<p>SGS has addressed this matter through Strategy recommendation 1 to investigate and facilitate servicing of existing employment lands.</p>

attempts at it.	
<p>16. I agree with the recommendations for Mulgrave (p4) but query why Vineyard is also not looked at? Why blankedly agree with Government policy in terms of Vineyard being for long term residential? It is ideally located (just as Mulgrave is) for employment lands. It too has proximity to the rail line and major arterial road. Limited employment land use of it could happen now with existing infrastructure without the long term need for upgrading of services required for residential development.</p>	<p>Local government is required to address the planning policies of the State Government. However, local government has the opportunity to provide local analysis through employment and housing studies that test State Government policies.</p>
<p>17. The following comments are made in relation to the recommended strategies at pp6-7.</p> <ul style="list-style-type: none"> • <i>Strategy 1. Investigate/facilitate servicing of vacant industrial lands.</i> Agree that strategy and timing is appropriate. • <i>Strategy 2. Capitalise on underutilised transport infrastructure.</i> Agree with strategy and timing but suggest lobbying should include duplication of Richmond rail line. • <i>Strategy 3. Facilitate renewal of existing centres with capacity for growth.</i> Generally agree with exception of bulky goods over old Skatel site in Brabyn Street Windsor. Also Richmond renewal should properly account for heritage significance. There should be a proper heritage analysis incorporated into any design. Further there may be more centres for capacity for growth than just those at Windsor/Richmond/North Richmond. Kurrajong, Wilberforce, Glossodia come to mind. Continued lobbying for services to these areas should be a priority. That large settlements like Kurrajong, Kurrajong Heights and Bowen Mountain do not have sewer is a disgrace. The fact that Kurrajong Heights and Bowen Mountain do not have reticulated water is a double disgrace. With the knowledge of how long it is taking to provide services at Wilberforce/Glossodia, lobbying for services to these other areas should be an absolute priority. • <i>Strategy 4. Office and business development at Clarendon.</i> I have concerns about this recommendation as previously indicated. • <i>Strategy 5. Investigate additional industrial land.</i> Strategy based on projected population growth that will not come to fruition without a residential strategy. Query the appropriateness of extending South Windsor industrial area when the Draft Report acknowledges that there is an access constraint. North Richmond requires a DCP before it is too late. 	<p>Bulky good proposal now removed from strategy. Heritage has been addressed by the removal of heritage listed lots as potential floorspace supply for additional floorspace required to 2031 (net).</p> <p>Smaller neighbourhood centres in Hawkesbury do not have the surrounding populations to warrant significant additional floorspace. This should be revised if additional population is proposed in these locations.</p> <p>SGS has used the term investigation area. This means the investigation areas may be suitable but that this can only be known once environmental investigations of the sites have been addressed. These are also medium to long-term strategies given that current demand does not warrant short-term release of additional industrial land.</p>

<p>Inappropriate examples of recent development exist adjoining the old Police Station heritage building and on the north-west corner of Bells Line and Terrace Roads. I query whether the recently approved commercial development with access off Council's Riverview Street carpark will provide an acceptable amenity and streetscape. The Gateway proposal at North Richmond (and Mulgrave and South Windsor) should have stringent DCP design controls including visual, floor space and land use type.</p> <ul style="list-style-type: none"> • <i>Strategy 6. Investigate employment types on non-employment zoned lands.</i> Agree. • <i>Strategy 7. Support specialised industry sectors such as Agriculture, Government Administration and RAAF.</i> Agree. However believe that there should be a "fall back" strategy for use of RAAF Base given that there are often observations made that the RAAF will close base. The land is above flood and is of a size if developed that developer funding could be applied for major flood free access provision and other road improvements. • <i>Strategy 8. Identify appropriate development treatments for Gateway areas.</i> Generally agree subject to proper design guidelines being in place as already mentioned. 	<p>With regards to North Richmond, the recommendations of this study would be one input into DCP revision by Council. The gateway treatment is specifically calling for a higher quality urban design response.</p> <p>Research finds that there are no current plans to close RAAF base within the life of the strategy. In fact, the higher security concerns have meant that Richmond RAAF has become more important to provide military air base access to the NSW area.</p>
<p>18. Just because the Government's Metro Strategy has a focus for new residential development on the North West Growth Centre does not mean that Hawkesbury cannot be pro-active in having further housing. Any future housing strategy should be aggressive in dictating what the community wants.</p>	<p>Housing outside scope of study.</p>
<p>19. The University of Western Sydney Hawkesbury is seen as a key asset (p35). This is true but it shouldn't mean that part of their land is not able to be investigated for future development. It is largely above flood and is of a size that development thereof could easily fund major road/transport improvements including flood access. This land should be investigated in a future residential strategy.</p>	<p>UWS was consulted for this study. There are currently no publicly available proposals for redevelopment of surplus UWS land. Nevertheless SGS agree that this land has potential and should be investigated for residential development. At scale this might change the employment fundamentals as well – requiring a revision to this strategy.</p>
<p>20. I do not agree that the need for protecting food supply land is merely a matter in weighing up the merits of urban development versus protecting agricultural land (p38). As previously mentioned the Hawkesbury is constrained by its flood plain but this is also the thing that has brought its character of dispersed towns and villages. The reality is that the majority of good agricultural land will never be urbanised due to flooding. There are, however, many opportunities for town and village consolidation without impact on agriculture. These opportunities</p>	<p>SGS has identified some broad areas that would be part of a wider study of employment landuses on agricultural zoned lands.</p>

<p>have been identified many times before and should be re-implemented and pursued.</p>	
<p>21. With a declining population and no new strategy for housing and encouraging population growth new investment around under-developed station locations (or anywhere else) is probably not going to happen (p43).</p>	<p>This is an investigations area and such considerations would be part of any investigation for additional floorspace in these locations.</p>
<p>22. The Draft Strategy indicates an urgent need for a strategic approach to rural land use (p49). I agree however query why previous Hawkesbury studies have not been referenced? There is no use reinventing the wheel. Previous studies have lots of information that is useful in today's context. Preparing a rural lands study may not be that difficult given existing data and documentation. Previous studies have recommended consolidation of towns and villages, lobbying for services etc whilst maintaining the "Hawkesbury" character.</p>	<p>There are currently no detailed landuse studies of all rural land in the Hawkesbury LGA that provide assessment of current floorspace, industry type and other landuse characteristics.</p>
<p>23. My belief about RAAF noise is that it is much over-emphasised (p64). The reality is that the majority of Hawkesbury residents who are within the RAAF noise footprints live there happily and accept the RAAF as a part of Hawkesbury life. There are still vacant lots being developed within the noise footprints. For some reason some are referred to the RAAF and some are not. Where referral takes place inevitably a response comes back from the RAAF objecting to the development. This is understandable as they do not want to increase any potential for complaint.</p> <p>However complaints are few and far between. There is no reason why land within the footprints cannot be developed for a range of uses including residential. Understandably some sites would require noise attenuation within the design but to restrict development within parts of Windsor and Richmond on the basis of RAAF noise is to make recognition that the majority of existing housing in these towns is sub-standard by being noise affected.</p> <p>My view is that a Noise Control DCP should be implemented that provides guidelines to appropriate orientation, window/door placements and sizes, insulation etc. An example of RAAF involvement gone wrong is the old Skatel site at Brabyn Street. This is ideally located residential land in the middle of other housing. Development of it was refused on the basis of</p>	<p>Development control within high ANEF affected areas is required to address Australian Standard 2021.</p>

<p>RAAF noise for 5 lots where it was accepted that 3 lots were ok. If it was good for 3 then it is good for 5 insofar as noise impact. Its subsequent recommendation in the Draft Strategy for bulky goods development is inappropriate as mentioned elsewhere.</p>	
<p>24. If there is a demand for further commercial land (p106), which in any case is based on projections that arguably will not come to fruition, and there are significant impediments to new business as a result thereof, then why not encourage re-development of existing older commercial areas? This could be encouraged by relaxing parking requirements close to transport nodes or by permitting increased densities subject to design criteria.</p>	<p>The strategy does recommend the reconfiguration of existing centres to allow for additional floorspace.</p>
<p>25. Redevelopment of the area around Richmond rail station (p115) should include residential development. Road and rail noise can be accounted for with suitable design. The overriding design parameter should be heritage integrity.</p>	<p>The study has recommended mixed use residential/commercial for Richmond redevelopment.</p>
<p>26. No bulky goods for Brabyn Street (p117). As mentioned this is prime residential land. Bulky goods development surrounded by existing residential development is inappropriate. Access for heavy vehicles is poor.</p>	<p>Agree – recommendation adjusted.</p>

<p>Finally I have some concern about rumours that abound in the community about the funding of the Draft Strategy coming from a developer and that this developer allegedly has an interest in the Clarendon land identified in the Study. I query how this can be seen as appropriate in an atmosphere of increasing public scrutiny and probity? I hope my comments are of use to you and I look forward to any comments that you might have. I would be pleased to discuss any issues with you.</p>	<p>SGS can understand this concern and we would be happy to have an explicit acknowledgement in the report as to the source of the funding and the transparent process undertaken to produce the report. We seek Council officers' thoughts on this issue.</p>
--	--