

Department of Planning, Infrastructure and Housing
c/o sydney-plan@planning.nsw.gov.au

6 March 2026

Dear Sir/Madam,

SUBMISSION TO THE DRAFT SYDNEY PLAN

Wollondilly Shire Council welcomes the opportunity to provide feedback on the Draft Sydney Plan and acknowledges the significant role this Plan will play in shaping the Sydney Region over the next 20 years.

Several key directions within the Plan are supported, including the focus on housing delivery in areas with existing infrastructure, the refinement of the Urban Footprint (formerly the Urban Area), and the aspiration for a 30-minute city. These positions align with Council's long-standing advocacy for infrastructure-led growth.

A range of recommendations have been provided to strengthen the Plan, including recommendations regarding the safeguarding of rural land, infrastructure provision, and the encouragement of jobs and investment in western Sydney.

Summary of Key Feedback

- **Plan Naming;** The proposed Sydney plan is clearly positioned as either a "Greater Sydney Plan" or a "Sydney and Surrounds Plan." This clarity is essential for councils and communities whose identity and functional relationships extend across more than one region.
- **Regional Alignment of Wollondilly;** Wollondilly has deep social, economic and cultural connections with both Greater Western Sydney and the Illawarra. Further analysis and engagement is required with Wollondilly Shire Council to determine whether Wollondilly is best aligned with Greater Sydney, the Illawarra, or an alternative structure to ensure the regional planning framework reflects its cross-regional role.



- **Infrastructure and Growth Sequencing;** Housing growth must be coordinated with the timely delivery of critical infrastructure, particularly in Wollondilly's growth areas (Wilton and Appin).
- **Vision and Strategic Direction;** The draft Plan's focus on infill development and the Urban Footprint is supported so long as there is a commitment to delivering on infrastructure needs for already rezoned state growth areas like Wilton. However, it requires a clear long-term vision with medium and long-term actions beyond 2029 and stronger alignment with State and Federal strategies.
- **Urban Footprint and Rural Land Protection;** The Urban Footprint should only include the identified state growth areas within Wollondilly. Development should prioritise the Urban Footprint, while rural and conservation lands require clear classification, policy guidance, and collaborative engagement with Council to safeguard productive and strategic lands.
- **Jobs and Transport;** Proactive planning is needed to support jobs growth in Greater Western Sydney, and transport infrastructure, including rail, bus and rapid transit, must be improved to enhance connectivity and support planned growth.
- **Natural Hazard Management;** The Plan needs to include stronger actions to give effect to the key policy goal identified within the plan of "maintain level of risk for existing communities in areas with high natural hazard risk by reducing pressure on key evacuation routes".

This matter was considered by our elected Council at their meeting on 24 February 2026 and Council has endorsed this submission.

Wollondilly Shire Council looks forward to continued collaboration with the Department of Planning, Housing and Infrastructure to refine the Plan.

Should you require any clarification on matters raised in this submission, please contact Council's Team Leader Strategic Planning, Carolyn Whitten, on (02) 4677 1100 or carolyn.whitten@wollondilly.nsw.gov.au.

Yours sincerely,



Matt Gould
Mayor of Wollondilly Shire





**Submission on draft
The Sydney Plan**

Wollondilly Shire Council

Our Position

The vision of the Plan is generally supported, particularly the key focus on infill development within eastern Sydney where existing infrastructure is available, as well as the inclusion of the Urban Footprint to guide future development, and desire for a 30-minute city.

However, the Plan would greatly benefit from a clearly articulated long-term vision to guide Greater Sydney's medium to long term future, as it currently reflects an overview of today's challenges. A range of recommendations are proposed to strengthen the future operation of the Plan, and consultation during finalisation is requested, primarily regarding the application of the Urban Footprint within the Shire.

Our Recommendations

Recommendation 1:

That the plan is clearly positioned as either a “Greater Sydney Plan” or a “Sydney and Surrounds Plan” and named as such.

Recommendation 2:

That further analysis and engagement be undertaken with Wollondilly Shire Council to determine the regional planning area within which Wollondilly is best positioned to support the achievement of broader regional strategic aims.

Recommendation 3:

The Plan contains a stronger long-term vision with supporting medium- and long-term actions, to guide strategic planning decision making beyond 2029.

Recommendation 4:

The Plan has integration with other city-shaping plans regarding transport, infrastructure and 24hr economies, as well as federal policies (e.g. National Urban Policy and the National Housing Accord) to ensure these are integrated into land use planning.

Recommendation 5:

The Plan has a level of spatial direction similar to the current District Plans, to ensure strategic planning can be effectively guided at the local level.

Recommendation 6:

All policy direction is situated within the Plan, and the Appendices are used for additional data and mapping only.

Recommendation 7:

Councils are engaged regarding the timing and applicability of proposed actions in the Plan, to ensure consideration of resourcing and budget availability, as well as alignment with Local Government processes (e.g. IP&R reporting).

Recommendation 8:

Appropriate grant funding should be provided to support councils in delivering these short-term actions, ensuring they can be implemented without compromising other statutory and strategic planning responsibilities.

Recommendation 9:

Update Appendix D - Pipeline of State Rezoning to recognise State-led rezoned growth areas within Wollondilly (Wilton and Appin).

Recommendation 10:

The Connected priority reflects the importance of alignment with infrastructure within greenfield areas, and not just for infill development.

Recommendation 11:

The Plan is to include a binding, sequenced infrastructure plan for greenfield precincts already zoned by the State Government.

Recommendation 12:

The State Government is to have equivalent actions to what is required for councils under Actions 5.5 and 5.6 regarding infrastructure planning.

Recommendation 13:

Response #10 is to be further supported by council and State actions which enforce the position that greenfield development is not a sustainable or efficient planning approach.

Recommendation 14:

The proposed housing target for Wollondilly of 5,500 should be retained, noting that achieving this target is largely dependent on the timely provision of essential State infrastructure. Response #1 should include an action which reflects the State's role in this matter.

Recommendation 15:

The policy approach and statement advocating for a 'bigger pipeline of potential homes' to meet housing targets be removed.

Recommendation 16:

The Plan should acknowledge the crucial role that dwelling caps play in effectively planning for and sequencing infrastructure within growth areas whilst committing to exploring alternate solutions to the current broad-brush prescribed density bands which could enable greater typology variety while respecting infrastructure and planning constraints and achieving the same strategic outcomes.

Recommendation 17:

The heading and framing of 'Response 11' be revised so it explicitly refers to *protecting and valuing rural and conservation areas*, rather than defining them solely as land beyond the urban footprint.

Recommendation 18:

A clear and consistent designation is introduced for lands, similar to the former Metropolitan Rural Area, to formally identify their strategic role, management intent, and significance.

Recommendation 19:

The State Government collaborates with Wollondilly when developing the State's Sydney Rural Land Study.

Recommendation 20:

The Plan separately identifies different classifications of land within the land beyond the Urban Footprint area. This would differentiate between productive rural uses, compared to conservation zoned land or rural towns and villages.

Recommendation 21:

The purpose and policy intent for identifying Picton, Tahmoor and Silverdale in the urban footprint be clarified, including any implications for growth, density, or rezoning.

Recommendation 22:

That, within Wollondilly, only land within the State led growth areas at Wilton and Appin be included in the mapped Urban Footprint.

Recommendation 23:

The Urban Footprint mapping is clarified, and Council is engaged regarding the finalisation of the proposed area. Only State Growth Areas of Appin and Wilton are to form part of the Urban Footprint within the LGA.

Recommendation 24:

Rural land is safeguarded by ensuring it cannot transition to other uses on the basis of viability of its current use.

Recommendation 25:

Development outside the Urban Footprint is restricted until post-2029, or the completion of the Greater Sydney Rural Lands Study.

Recommendation 26:

If Appendix J is implemented, it is to apply to State-led rezonings, as-well as Local Government led applications.

Recommendation 27:

The Plan strengthens its direction on jobs growth in Greater Western Sydney to proactively address the jobs imbalance and support future industry investment.

Recommendation 28:

The Plan reflects the role of the Western Sydney International (Nancy-Bird Walton) Airport and Port Kembla in provision of jobs, and the opportunity for an enterprise corridor between these investments.

Recommendation 29:

Job targets are provided at the Local Government level, with information on how the specified ranges have been developed, in order to assist with local planning.

Recommendation 30:

The plan addresses inequities in access to public transport, in order to deliver the intent of the Connected priority.

Recommendation 31:

Mapping in the Plan accurately reflect the quality of rail services in Wollondilly, including the limits of electrification and reliance on diesel services south of Macarthur.

Recommendation 32:

The Urban Footprint is extended to include land identified within the Greater Macarthur Structure Plan as 'Future employment land'.

Recommendation 33:

Wilton Town Centre is classified as an emerging Commercial centre (rather than an emerging Retail centre).

Recommendation 34:

The Residential centre typology is updated to recognise that not all centres have access to frequent busses, and therefore not all are capable of contributing to the provision of higher density housing.

Recommendation 35:

Open Space mapping distinguish publicly accessible areas from conservation land to accurately reflect community access and support planning and investment decisions.

Recommendation 36:

The Plan needs to recognise the environmental benefits of the blue-green grid, beyond the provision of open space, including recognising Wollondilly's position as the "green lungs" of Greater Sydney and capturing blue-green grid infrastructure within Wollondilly.

Recommendation 37:

Clarification be provided on the purpose, scope, and timing of DAP implementation plans to ensure alignment with the regional DAP and feasibility for councils.

Recommendation 38:

The Plan is to include stronger actions to ensure that we maintain or reduce the level of risk for existing communities in areas with high natural hazard risk by reducing pressure on key evacuation routes.

Recommendation 39:

The Plan is updated to reflect the social and health implications of urban heat, and include stronger actions on how this hazard will be mitigated.

Recommendation 40:

Further guidance is provided to councils to ensure Aboriginal Outcomes can be genuinely considered during local strategic planning decision making, including guidance for or provision of standardised clauses and controls regarding caring for country.

Recommendation 41:

The corrections and amendments to figures, mapping and images identified within this submission are addressed prior to finalisation, and Council is consulted where clarification is required.



Wollondilly Shire Council

Frank McKay Building

62-64 Menangle Street, Picton NSW 2571

PO Box 21, Picton NSW 2571

wollondilly.nsw.gov.au

T 02 4677 1100

E council@wollondilly.nsw.gov.au

QA Code 420205241115

ABN 93 723 245 808

Response to the Draft Sydney Plan

1. Regional Alignment of Wollondilly for Strategic Planning

The new strategic planning framework provides an opportunity to better recognise and respond to the cross-regional linkages experienced by communities located at the Greater Sydney boundary. In this context, it is important that the proposed *Sydney* plan is clearly positioned as either a “Greater Sydney Plan” or a “Sydney and Surrounds Plan.” This clarity is essential for councils and communities whose identity and functional relationships extend across more than one region and who exist on the peri-urban fringe.

Wollondilly Shire represents one of the most significant examples of this cross-regional complexity. The Shire has strong and enduring linkages with Greater Western Sydney, the Illawarra, and parts of Regional NSW, reflected in daily movement patterns, employment ties, environmental systems, cultural connections and shared community identity. The shire sits as the linkage between these regions and will play a crucial role in building an economic arc from the Illawarra through to Western Sydney and in realising the broader regional opportunities that can come from Western Sydney International Airport.

Wollondilly also has strong relations in and is actively engaged with both Greater Western Sydney councils and the councils of the Illawarra, and we are an active member of both the Outer Western Sydney Alliance (formerly The Parks) and the Illawarra/Shoalhaven Joint Organisation (ISJO).

Any future regional plan must be capable of recognising and supporting these relationships, rather than constraining them within a single regional boundary.

Wollondilly’s strategic role is shaped by its dual orientation:

- as part of Greater Western Sydney, with strong links to major transport routes (including the Sydney motorway network and Sydney Trains), and access to jobs, regional shopping schools and health services; and
- as part of the wider Illawarra, connected through community relationships, economic activity and natural systems that transcend administrative borders.

By 2041 over two thirds of Wollondilly’s population is expected to live closer to Wollongong than to Liverpool, Penrith or Parramatta. Recognising this, further detailed consideration is required to determine which regional plan Wollondilly should align with for strategic planning purposes. Options that should be explored include:

- alignment with the Greater Sydney plan,
- alignment with the Illawarra plan,

- a dual-plan alignment, or
- an alternative mechanism that formally acknowledges Wollondilly’s cross-regional position and ensures that strategic planning outcomes reflect the Shire’s lived regional relationships.

Council seeks continued and meaningful engagement with the Minister for Planning and Public Spaces and the Department of Planning, Housing and Infrastructure prior to finalisation of the framework. This engagement will be essential to ensuring that Wollondilly’s regional alignment is determined in a way that best reflects the needs, identity and long-term strategic direction of our community.

It is recommended that:

1. That the plan is clearly positioned as either a “Greater Sydney Plan” or a “Sydney and Surrounds Plan” and named as such.
2. That further analysis and engagement be undertaken with Wollondilly Shire council to determine the regional planning area within which Wollondilly is best positioned to support the achievement of broader regional strategic aims.

2. Vision of the Sydney Plan

The Plan reads largely as an overview of current challenges rather than a fully defined 20-year land use strategy. The plan would greatly benefit from a clearly articulated long-term vision to guide Greater Sydney’s medium to long term future. It is understood the new State-Wide Land Use Plan will provide a vision. However, if a single State-Wide Plan is intended to sit at the top of the hierarchy, then its release should logically precede the Draft Sydney Plan.

The lack of strong strategic direction is illustrated by the Plan containing only short terms actions (2026-29), which generally reflect the recent policy changes within the NSW Planning System (e.g. changes to low- and mid-rise housing). Without initiatives that extend beyond this period, the Plan struggles to demonstrate a cohesive strategic pathway for Greater Sydney’s next 20 years, and is at risk of reflecting a moment in time which provides little strategic guidance.

Landuse planning does not operate in isolation, and the Plan could better demonstrate its relationship and response to other significant city-shaping plans. For example, its intended alignment with federal policies such as the National Urban Policy and the National Housing Accord, as well as State plans regarding transport and freight, infrastructure and 24-hour economies. Whilst these may not be within the direct remit of the Department of Planning, Housing and Infrastructure (DPHI), the Plan should articulate and consolidate the Government’s overall vision and priorities for the future of the region as a whole.

A number of aspirations of the Plan are supported, as acknowledged within this submission. For example, the key focus on providing additional housing within Eastern Sydney where existing infrastructure is available, is supported. However,

this is not to be at the cost of less investment in Greater Western Sydney to address the lack of infrastructure resulting from historical State Government rezonings. The inclusion of the Urban Footprint to guide future development, and desire for a 30-minute city are also supported.

Detail of Current District Plans

As noted in the submission on the Discussion Paper, the current District Plans provide a high level of spatial direction that frames regional priorities while still providing a level of detail that can be used to inform local strategies and the assessment of planning proposals.

Figure 31, Housing Targets, (page 45) illustrates the four areas within the region plan, being the Western, Central, Eastern (North) and Eastern (South) Sydney areas. However, the draft Plan does not delve into great detail regarding the unique characteristics or challenges of these areas, to guide further localised planning. For example, Greater Western Sydney residents have limited access to higher-order and knowledge-based employment, with high concentrations of shift workers associated with health and logistics industries. This is not adequately recognised within the Plan, along with potential planning responses to this issue, such as opportunities to better support late night economies.

Use of Appendices

The Plan is supported by a number of Appendices, and Appendix A explains that these provide additional information, guidance and data for the Plans implementation.

These may be updated alongside new policies, major announcements, and legislative changes and data releases etc. It is recommended all policy direction is situated within the Plan, and the Appendices only contain data and/or additional mapping. This would clarify the weight of the State's policy position, when assessing planning proposals.

As noted in the response to the Discussion Paper, modular updates may reduce certainty in the overall strategic planning process, as strategic planning may become short-sighted and reactive. Where they are proposed, there are to be clear parameters for their consultation.

It is recommended that:

3. The Plan contains a stronger long-term vision with supporting medium- and long-term actions, to guide strategic planning decision making beyond 2029.
4. The Plan has integration with other city-shaping plans regarding transport, infrastructure and 24hr economies, as well as federal policies (e.g. National Urban Policy and the National Housing Accord) to ensure these are integrated into land use planning.

5. The Plan has a level of spatial direction similar to the current District Plans, to ensure strategic planning can be effectively guided at the local level.
6. All policy direction is situated within the Plan, and the Appendices are used for additional data and mapping only.

3. Effective Collaboration and Resourcing for Council Implementation

The development of Discussion Paper and Draft Sydney Plan proceeded without genuine and meaningful engagement with councils, presenting a valuable opportunity to strengthen collaboration in the next stages. In finalising these documents, DPHI is encouraged to collaborate with councils on both the actions they are expected to implement and other key elements of the plan, including the completion of mapping.

The Draft Plan contains a number of actions for Council in the short term (primarily in 2026-27). These actions require investigative work to inform changes to Local Strategic Planning Statements (LSPS's), Local Environmental Plans (LEP's), Development Control Plans (DCP's) and Contributions Plans (CP's).

The concentration of early-period requirements in the draft Sydney Plan, which are intended to be delivered within the next 18 months, are not currently planned or budgeted for and will place considerable pressure on council planning resources. This could compromise council's capacity to meet housing targets, as staff are simultaneously required to continue delivering other statutory and strategic planning functions under the *Environmental Planning and Assessment Act 1979* within existing resources (such as managing growth areas, assessing planning proposals, and process development applications).

Councils also have ongoing commitments under the *Local Government Act 1993*, including obligations to deliver strategic planning work and other actions outlined in their adopted Delivery Programs and Operational Plans through the Integrated Planning and Reporting (IP&R) framework. The Government has indicated its intention to review Local Strategic Planning Statements (LSPSs) to provide updated advice to councils, with one of the stated aims being to better align LSPSs with councils' IP&R cycles. Requiring councils to deliver these front-loaded actions in parallel with the commencement of this review is inconsistent with this stated objective, as it limits councils' capacity to integrate LSPS updates with their existing strategic planning programs.

Strong and deliverable timeframes, supported by adequate grant funding, are essential to ensure these requirements can be implemented without compromising councils' ongoing statutory and strategic planning functions.

To ensure the Draft Plan's requirements are achievable, the actions allocated to councils should either be reduced, timeframes significantly extended, or substantial funding provided to support their implementation. The actions should also be updated to clearly indicate the councils to which they apply. This

consideration should extend to the programming of DPPI-led work (e.g. release of State Land Use Plan), to not further burden councils with limited resources in responding to these changes.

Additionally, Action 5.3 requires Council to use Urban Development Program (UDP) and Employment Land Development Program (ELDP) data to inform local level infrastructure Plans. Councils have been calling for access to this data for the past 12 months, to work in with the 4-year Integrated Planning and Reporting (IP&R) framework planning. The timing of this action misaligns with Local Government processes. Consultation is requested to ensure proposed actions are efficiently aligned with future local strategies.

It is recommended that:

7. Councils are engaged regarding the timing and applicability of proposed actions within the Plan, to ensure consideration of resourcing and budget availability, as well as alignment with Local Government processes (e.g. IP&R reporting).
8. Appropriate grant funding should be provided to support councils in delivering these short-term actions, ensuring they can be implemented without compromising other statutory and strategic planning responsibilities.

4. Growth Sequencing and Infrastructure Alignment (Priorities: Housed & Coordinated, Response: #5 & #10)

The draft Sydney Plan recognises that there have been delays in infrastructure provision, particularly in greenfield precincts in Western Sydney, and in response is prioritising housing towards Sydney's east. This policy position is supported, so long as there is a commitment to delivering on infrastructure needs for already rezoned state growth areas like Wilton, as it aligns with Council's long held policy direction and advocacy for growth aligned with infrastructure.

Historically, land has been rezoned by the State Government, which did not have the ability to be serviced in a timely or cost-effective manner. Within the Wollondilly Shire, there is zoned land still awaiting critical enabling infrastructure, as well as supporting infrastructure to accommodate the new population. Appendix D – Pipeline of State Rezoning greatly misrepresents the extent of greenfield development within the Shire, as it does not include the Wilton and Appin State-led rezonings.

The draft Sydney Plan should more clearly recognise that land rezoned by the State Government still requires the delivery of critical infrastructure. The Housed priority (page 23) notes greenfield development will continue to deliver housing supply, as new infrastructure comes online. However, the primary focus of the Coordinated priority (p42) is primarily regarding the location of new housing within infill precincts.

The Coordinated priority is to make it clear that greenfield areas should also have a coordinated approach to their development. This needs to be supported by the provision of a binding plan for the sequenced delivery of infrastructure (water, sewerage, roads, public transport, health and education etc) to these areas.

The Plan needs to focus more on providing enabling infrastructure for existing greenfield State led Growth Areas (such as Wilton and Appin) to activate them and measures to avoid opening up new development fronts where existing infrastructure isn't in place. This approach not only diverts council planning resources that could be better utilised if focused on the delivery of existing growth areas but it also stretches already limited infrastructure funding and further overextends the demands on infrastructure delivery agencies like Sydney Water, which are already struggling to deliver enabling infrastructure within current growth areas.

In essence, the way to get more homes delivered faster, and build better communities, is to focus our limited resources and budgets at the land already identified for growth and rezoned ready for delivery.

In regards to Response #5 'Align infrastructure to planned growth', the proposed State Government actions are inadequate and there is a need for the State to take a much more active role in this area given this is often Council's limiting factor within existing growth areas and is delaying the delivery of housing on the ground. Actions 5.5 and 5.6 regarding the need for councils to review infrastructure schedules and plans should also have an equivalent action for the State Government, regarding their State level infrastructure demands and delivery.

There has been limited transparency and meaningful engagement with councils on the Sydney Infrastructure Opportunities Plan (IOP). Therefore, there is uncertainty in the State Government's ability to prioritise and guide infrastructure investment for all the land it has already rezoned.

Additionally, Response #10 'Sequence planned growth in greenfield areas within the urban footprint', states "*Given the existing rezoned capacity, and the relatively high costs and complexity of servicing greenfield areas, expanding additional development fronts in these locations does not represent a sustainable or efficient planning approach in the near term.*" The Plan must support this key statement with actions for State and councils, to ensure this is implemented in practice.

It is recommended that:

9. Update Appendix D - Pipeline of State Rezoning to recognise State-led rezoned growth areas in Wollondilly (Wilton and Appin).
10. The Connected priority reflects the importance of alignment with infrastructure within greenfield areas, and not just for infill development.
11. The Plan is to include a binding, sequenced infrastructure plan for greenfield precincts already zoned by the State Government.

12. The State Government is to have equivalent actions to what is required for councils under Actions 5.5 and 5.6 regarding infrastructure planning.
13. Response #10 is to be further supported by council and State actions which enforce the position that additional greenfield development beyond existing identified growth areas is not a sustainable or efficient planning approach.

5. Housing Targets (Priority: Housed, Response: #1 & #2)

The draft Sydney Plan's 2024-29 housing target of 5,500 for Wollondilly is supported in principle. It should be noted, however, that achieving this target is largely contingent on the provision of essential infrastructure by the State Government. Given the role of the State Government regarding the provision of housing, Response #1 is to include an action recognising the State's enabling role for the provision of infrastructure to unlock existing rezoned land in State growth areas.

Council does not agree with the Plans proposition to provide a 'bigger pipeline of potential homes' as a means to meet the housing target. While increasing the supply of land may appear to support delivery of housing targets, there is a significant risk that this approach could be used to justify ad hoc or opportunistic planning proposals that are not consistent with established strategic priorities, infrastructure sequencing, or local housing strategies. Expanding the pipeline in this way may undermine the planned sequencing of development, the efficient use of infrastructure, and the achievement of broader state and local planning outcomes, including affordable housing, employment provision, management of risks from natural hazards, and environmental protection. Council considers that housing targets should instead be met through planned and coordinated growth within the existing urban footprint and identified growth areas, consistent with strategic frameworks and the infrastructure required to support sustainable communities.

Wollondilly's growth areas have dwelling caps, which are based on infrastructure constraints, often resulting from State agency limitations. The Plan should recognise the legitimacy and importance of these caps in order to effectively sequence and coordinate infrastructure delivery in a consistent and planned manner. This will require the consideration of servicing constraints through the strategic planning framework.

The draft Sydney Plan acknowledges the need for housing diversity. While Wollondilly would be open to some more diverse urban typologies within the growth areas, the combined effect of the dwelling caps under the Western Parkland Precinct SEPP and the current broad-brush prescribed density bands means it is unlikely that development outcomes will extend beyond detached dwellings

The current approach to density/typology also creates challenges in facilitating an equitable allocation of the dwelling caps across parts of growth areas with fragmented ownership patterns. This concern has also been raised by developers, and consideration should be given to retaining the overall dwelling cap (given their

importance in growth and infrastructure planning), while either exploring more nuanced density bands or alternative methods that retain the dwelling caps and achieve the same strategic outcomes whilst enabling a more genuine and flexible delivery of housing diversity.

It is recommended that:

14. The proposed housing target for Wollondilly of 5,500 should be retained, noting that achieving this target is largely dependent on the timely provision of essential State infrastructure. Response #1 should include an action which reflects the States role in this matter.
15. The policy approach and statement removed that advocates for a 'bigger pipeline of potential homes' above and beyond to meet housing targets.
16. The Plan should acknowledge the crucial role that dwelling caps play in effectively planning for and sequencing infrastructure within growth areas whilst committing to exploring alternate solutions to the current broad-brush prescribed density bands which could enable greater typology variety while respecting infrastructure and planning constraints and achieving the same strategic outcomes.

6. Land beyond the Urban Footprint (Response #11)

Council's Rural Lands Strategy recognises the economic and social significance of rural land, and seeks to retain and enhance rural land, to support its viability for primary production. Strategic planning at the State level is to also recognise the significance of rural land and support its ongoing viability. A key aspect of this, is ensuring that rural land is recognised as a significant land use in its own right, and not treated as employment or residential development land in waiting.

Support for Response #11

The strategic direction within Response #11 (p64) that only land within the urban footprint should cater for urban development, and that rural and conservation areas (formerly the Metropolitan Rural Area (MRA)) is not waiting urban development is supported. This position strongly aligns with Council's adopted land use policies (Local Strategic Planning Statement and Rural Lands Strategy), as well as other aspects of the draft Sydney Plan, which encourage infill development in connected areas and seek to achieve a 30-minute city.

Action 11.1 and the commitment for the NSW Government to undertake a Rural Lands Study for Greater Sydney is supported and should be prioritised. Genuine collaboration with Wollondilly in the delivery of this study is requested, given local expertise and knowledge of the barriers and opportunities of our rural lands and associated industries.

Classification of Rural Land

The Plan recognises the valuable contribution of productive rural land in providing fresh produce in Sydney's food bowl, providing local jobs and the financial contribution it makes to the NSW Government.

To ensure this contribution to the States' productivity is recognised, the Plan should separately identify primary agricultural production areas. This would mean it is differentiated from other land uses beyond the Urban Footprint (e.g. conservation areas) which play a significantly different role in land use planning.

Recognising and Valuing Rural and Conservation Land

The draft Sydney Plan dedicates a response to rural and conservation areas outside Sydney's urban footprint; however, the framing of this section undervalues the significance of these landscapes. Positioning rural and conservation land simply as the areas "outside the urban footprint" diminishes their intrinsic environmental, economic and cultural value, and fails to acknowledge their role as established and important land uses in their own right.

Unlike the previous plan which identified these areas through the Metropolitan Rural Area designation, the draft Sydney Plan does not provide a clear or consistent classification for rural land and villages. While the earlier designation generated some debate about purpose and application, it nonetheless effectively recognised the distinct status of rural and conservation land within the broader metropolitan context. The absence of any equivalent designation in the draft Plan risks signalling that these lands are of lesser strategic importance and created uncertainty for long-term policy direction.

A more explicit recognition of rural and conservation lands, supported by a clear designation and purpose, would reinforce their importance and ensure they are appropriately considered in the strategic planning framework. This would also provide clearer guidance for councils, landowners and agencies on how these areas are to be valued, protected and managed into the future.

Urban Footprint Mapping in Wollondilly

The draft Sydney Plan includes mapping throughout the document, including Appendix J, showing areas designated as rural and conservation lands. This mapping is illustrative only and presented at a regional scale, making it difficult to determine exactly what land has been included. While these maps largely correspond to the former Metropolitan Rural Area, the lack of clarity reduces their practical value for local planning.

For Wollondilly, the draft Plan identifies Picton, Tahmoor, Camden Park and Warragamba/Silverdale as part of the "urban footprint," while other towns and villages both within Wollondilly and in neighbouring LGAs with similar residential zoning and growth patterns are not included. The policy intent behind identifying only these towns is unclear. Wollondilly's rural towns and villages within and outside the proposed urban footprint predominantly share the same residential zones, with comparable permissibility across the Shire.

The Department has verbally confirmed that the mapping reflects only current urban zoned land and has committed to finalising the mapping in consultation with Council, which is strongly supported. However, the Department has also indicated that the mapping will be finalised on a longer timeframe than the finalisation of the draft Sydney Plan. This is concerning, as the draft Sydney Plan relies on the high-level mapping throughout the document, meaning current planning guidance is based on information that may change.

Wollondilly, including the towns and villages identified within the urban area in the plan was specifically excluded from the Low and Mid Rise housing reforms due to the scale of bushfire and flood risks, the significant evacuation risks that exist across the LGA and the need to ensure that *“any increase in dwelling capacity within this Local Government Area requires a strategic approach and technical studies to ensure risks are appropriately managed”*. Given these acknowledged and significant constraints it would not be appropriate to extend the urban footprint into Wollondilly beyond the identified state growth areas.

The rationale for identifying Picton, Tahmoor, and Warragamba/Silverdale differently from Wollondilly’s other rural towns and villages is unclear. The draft Sydney Plan provides no specific policy direction for these areas, which are not inner-city locations, are not well served by existing infrastructure and which all have significant bushfire and/or flooding constraints and evacuation issues.

If no discernible policy or intended outcomes apply to these towns, it is unclear why they have been mapped separately, as their identification does not appear to achieve any planning purpose and could introduce significant additional risk. Questions remain about whether councils are being directed to increase density in these locations, whether Action 2.8 (reviewing minimum lot sizes for dual occupancies outside Low and Mid-Rise Housing Areas) is intended to apply within the urban footprint only, or whether rezoning of surrounding rural land would be permitted to facilitate growth in these towns. Such outcomes would appear inconsistent with the Plan’s stated focus on infill housing in Sydney’s East and identified growth areas in Western Sydney. The absence of explanation or guidance creates uncertainty for councils, landowners, and the community regarding the intended role and future growth of these towns.

Application of Urban Footprint to Wollondilly’s Rural Towns and Villages

Further clarification regarding the boundaries of the Urban Footprint is requested. Wollondilly’s towns and villages (beyond the Growth Areas) are currently identified as part of the Metropolitan Rural Area; however, some have been mapped within the Urban Footprint. It is recommended that Council be engaged in the finalisation of the Urban Footprint.

Wollondilly is already doing more than its fair share to provide housing and address the housing crisis. The State led Growth Areas of Appin and Wilton within Wollondilly will accommodate the majority of forecasted housing growth. Wollondilly’s Local Housing Strategy recognises the Wilton Growth Area will accommodate 90% of forecasted housing growth, with additional supply also

expected from the Greater Macarthur Growth Area. As 32,000+ homes are to be accommodated within these State led Growth Areas, the remaining areas within Wollondilly should not be included in the Urban Footprint, which would retain their equivalent current status as being subject to the Metropolitan Rural Area.

The following points are also noted:

- **Picton & Tahmoor:** The Urban Footprint mapping is not consistent with Council's Local Housing Strategy (LHS), which has been endorsed by the Department. While the LHS identifies Picton and Tahmoor, as having the greatest opportunities and capacity to accommodate future local growth, this is within areas that have all already been rezoned and which in most cases are currently being developed. Their identification as being suitable for local growth does not imply support for the mapped inclusion of these areas in the Urban Footprint, particularly given the bushfire and flooding risks and the significant evacuation challenges these communities face.
- **Warragamba & Silverdale:** Warragamba and Silverdale face significant bushfire risk, with a long history of significant bushfire impact. Evacuations routes for the area are heavily constrained with the only evacuation route being Silverdale Rd, which runs through thick bushland. The area is also regularly isolated by flooding of the Upper Nepean through the Wallacia floodplain. Notably, in regards to Warragamba and Silverdale, Wollondilly's 2040 Local Strategic Planning Statement (LSPS) identifies northern areas of the Shire as unsuitable for additional residential subdivision due to curfew-free operations at Western Sydney International (Nancy-Bird Walton) Airport and future flight paths. Any significant additional housing in close proximity to the airport should therefore be avoided to safeguard future 24-hour operations. Consideration should be given to the LSPS guidance for these locations.

These locations are effectively at maximum capacity for growth and are not suitable to accommodate additional growth at the densities suggested in the Sydney Plan for areas within the Urban Footprint and fall well below the centre typologies described under the 'Prosperous' priority, highlighting a clear misalignment between the State's mapped approach, and the outcomes and priorities established in the Wollondilly Local Housing Strategy.

Wollondilly's towns and villages (other than Wilton and Appin Growth Areas) should remain outside the Urban Footprint, as they are not suitable for increased residential development. Suitability is constrained by a combination of factors, including water and wastewater servicing capacity, land use conflicts, proposed mining activities, and natural hazards. Their unsuitability has also been recognised in the State Government's endorsement of the Local Housing Strategy and recent policy decisions not to apply Low and Medium Density Housing reforms within Wollondilly Shire.

Limit Transition of Rural Land

The draft Sydney Plan must be strengthened to limit the ability for rural land to transition to other uses, particularly to prevent rural land being treated as employment or development land “in waiting”. The NSW Agricultural Commissioner’s 2021 report on improving agriculture in the NSW Planning System, found that ad-hoc rezonings impact land prices, impede agricultural expansion and produce land use conflict. It recommends that the planning framework is clear about planned and permitted future use of land, to reduce speculation and avoid impacts on land values.

Rural land is best safeguarded when its transition is not tied to assessments of viability, as proposed in the Plan. Viability is a measure that naturally evolves as market conditions and community needs shift over time and just because a current use may have limited viability it does not mean that alternative agricultural land uses would not be viable. This variability can also be influenced by external catalysts, for example, the introduction of major infrastructure such as the Western Sydney International Airport.

Additionally, many parcels of rural land may be currently underutilised and/or vacant, but can still support a range of agricultural uses. Limiting protection to only “productive” rural land will invariably encourage land banking, with applicants claiming that land is unproductive to seek rezoning. Council has numerous previous examples of such requests, where the Department of Primary Industries and Regional Development determined that, despite the developer’ claim of current unproductivity, the land remained capable of agricultural development.

Prioritise development within the Urban Footprint

The draft Plan states that the existing urban footprint has sufficient land to accommodate projected growth, however this is contradicted by the ability for new urban investigation areas outside of the urban footprint to be identified (Appendix J – Urban footprint policy guidance).

Given the short-term nature of the Plan, urban development outside of the urban footprint should not be considered during this period. This would ensure there is a clear direction for infill development and the prioritisation of infrastructure within the urban footprint area. Alternatively, it should not occur until the Department’s Greater Sydney Rural Lands Study is complete.

If Appendix J is to be adopted, its criteria for rezoning land outside the urban footprint should apply to any State Government led rezonings, as well as council proposed rezonings. This creates a consistent approach to the assessment of land use planning.

It is recommended that:

17. The heading and framing of ‘Response 11’ be revised so it explicitly refers to *protecting and valuing rural and conservation areas*, rather than defining them solely as land beyond the urban footprint.

18. A clear and consistent designation is introduced for these lands, similar to the former Metropolitan Rural Area, to formally identify their strategic role, management intent, and significance.
19. The State Government collaborates with Wollondilly when developing the State's Sydney Rural Land Study.
20. The Plan separately identifies different classifications of land within the land beyond the Urban Footprint area. This would differentiate between productive rural uses, compared to conservation zoned land or rural towns and villages.
21. The purpose and policy intent for identifying Picton, Tahmoor and Warragamba/Silverdale in the urban footprint be clarified, including any implications for growth, density, or rezoning.
22. That, within Wollondilly, only land within the State led growth areas at Wilton and Appin be included in the mapped Urban Footprint.
23. The Urban Footprint mapping is clarified, and Council is engaged regarding the finalisation of the proposed area. Only State Growth Areas of Appin and Wilton are to form part of the Urban Footprint within the LGA.
24. Rural land is safeguarded by ensuring it cannot transition to other uses purely on the basis of viability of its current use.
25. Development outside the Urban Footprint is restricted until post-2029, or the completion of the Sydney Rural Lands Study.
26. If Appendix J is implemented, it is to apply to State-led rezonings, as-well as Local Government led applications.

7. Planning for Jobs in Western Sydney (Response #4)

Council strongly supports the need for a continued focus on planning for jobs, given the population growth being planned for within the Macarthur region over the next 20 years. The Plan does not appear to provide the direction on planning for new jobs and industries and fundamentally resolving the jobs imbalance across Greater Sydney.

The imminent opening of the Western Sydney International (Nancy-Bird Walton) Airport has the potential to transform Western Sydney. The Plan should capitalise on this infrastructure investment and its tourism, aviation, logistics and service industries opportunities by formally recognising a State-Significant Enterprise Corridor from Western Sydney to the Illawarra (from Airport to Port).

Within the *Metropolis of Three Cities*, there was a genuine attempt to reframe Western Sydney for its economic development potential. This direction resulted in increased industry investment and on-the-ground outcomes beginning to take shape. The Sydney Plan should continue to proactively lead planning for future

growth of jobs in Western Sydney, by setting a clear framework for the roles and functions of existing and new employment centres and precincts across Sydney.

The job corridor example in Figure 37 (page 52) is a reversion to the 'Global Economic Corridor' of the 2014 A Plan for Growing Sydney. DPHI are encouraged to look to the future by recognising new opportunities rather than highlighting existing ones.

It is Council's view that a prosperous city is one that is functional and underpinned by a holistic and integrated transport and infrastructure plan (including freight) that supports and directs future growth. Planning for jobs and housing, with the necessary infrastructure requirements should be carried out at the same time, so that our residents have access to local jobs and services, reducing the need to leave the Shire for work or travel long distances, providing better quality of life. The Plan could be better supported by demonstrating a more coordinated approach.

Appendix E: Jobs Guidance

Whilst the Plan identifies a jobs range for Western Sydney, it does not demonstrate expectations for how this range applies to individual councils. Council has been proactive in identifying and planning for new industries and jobs growth. Clear directions at the State level provides clarity for the orderly investment in enabling and supporting infrastructure required to deliver on-the-ground outcomes. Further background information to how the specified ranges have been developed through forecasting and population projections is requested, which will assist council's in updating their local planning strategies in response to the Plan.

It is recommended that:

27. The Plan strengthens its direction on jobs growth in Western Sydney to proactively address the jobs imbalance and support future industry investment.
28. The Plan reflects the role of the Western Sydney International (Nancy-Bird Walton) Airport and Port Kembla in provision of jobs, and the opportunity for an enterprise corridor between these investments.
29. Job targets are provided at the Local Government level, with information on how the specified ranges have been developed, in order to assist with local planning.

8. Investment in Transport Infrastructure (Priority: Connected)

The draft Sydney Plan identifies it is underpinned by access to transport. Given Wollondilly's fundamental lack of public transport and connectivity, the positive outcomes that the Connected priority seeks to facilitate results in missed opportunities for the Shire. There is a deficit in current transport infrastructure to service the existing population, and also a lack of certainty regarding the provision of new transport infrastructure to support future growth.

Council continues to call upon the NSW Government to address shortfalls in transport investment, which will unlock opportunities for housing and jobs. It is recommended the plan is amended to consider long term investment in transport infrastructure, to support the vision of the plan, including:

- Deliver the Macarthur Metro (North South Rail Link) before 2038
- Extend the T8 Line into Wollondilly
- Commit to the Maldon-Dombarton rail line
- Provision of immediate rapid bus services

Additionally, the draft Sydney Plan should accurately identify the existing rail provision in the Shire. For example, Figure 33 (page 47) misrepresents the provision of rail south of Macarthur, as electrification ends at this point and services beyond rely on diesel-powered trains with significantly reduced service levels compared to the rest of the network.

Train services to the Shire are unreliable, untimely and require multiple changes due to lack of connectivity with the broader Sydney Trains network. A change in colour for the train line is required to present an accurate picture of accessibility for Wollondilly.

It is recommended that:

30. The plan addresses inequities in access to public transport, in order to deliver the intent of the Connected priority.

31. Mapping in the Plan accurately reflect the quality of rail services in Wollondilly, including the limits of electrification and reliance on diesel services south of Macarthur.

9. Future Employment Land (Response #8)

Council supports the renewed focus on planning for industrial land supply given current constraints in the Sydney Region and NSW. Wollondilly is well placed to cater for industrial land supply growth and has proactively led the identification of new investigation areas.

Council has provided a submission on the draft Statewide Policy for Industrial Lands and we refer DPHI to our submission for detailed comments on the draft Policy and proposed categorisation (including the recommendation that Warragamba and Picton employment lands are classified as locally significant).

Consideration of Greater Macarthur Growth Area Structure Plan

It is recommended the Urban Footprint is amended to consider proposed industrial land along Moreton Park Road in Menangle and Douglas Park. This land is identified within the Greater Macarthur Structure Plan as 'Future employment land' and is also reflected in Council's Employment Land Strategy Addendum. Council

is currently assessing two planning proposals for employment uses that cover this precinct. The opportunity for this should also be reflected in Figure 18 (page 24) regarding Sydney's employment network.

It is supported that land identified in the Greater Macarthur Structure Plan west of the Hume Highway as 'Potential future employment, subject to investigation and consultation', is not identified as part of the Urban Footprint. This should remain outside the Urban Footprint due to its scenic landscape significance and the need to provide an appropriate buffer between urban and rural land.

It is recommended that:

32. The Urban Footprint is extended to include land identified within the Greater Macarthur Structure Plan as 'Future employment land'.

10. Centre Typologies (Priority: Prosperous)

Classification of Wilton Town Centre

Wilton Town Centre is recognised as an emerging Retail centre under the proposed centres framework. Wilton Town Centre should be considered as an emerging Commercial centre as its attributes and potential for future growth will meet the required criteria. Whilst the Wilton Town Centre Precinct Finalisation Report (prepared by DPHI) identifies approximately 7,000 projected jobs, this should not be considered a 'ceiling'. Expectations for Wilton Town Centre are that it will grow to a similar role and function of Rouse Hill, which is identified as an emerging Commercial centre under the Plan.

It will be the location of a future health facility, multiple educational facilities, have high density residential development located within its core and is surrounded by industrial lands which are proposed to be categorised as regionally significant under the draft Statewide Policy for Industrial Lands.

Recognition of its future status as an emerging Commercial centre will assist in planning and prioritising the required infrastructure in order to reach its potential and assist in rectifying the jobs imbalance across Greater Sydney.

Residential Centres

The Plan notes that Residential centres are serviced by 'frequent busses'. However, this is not the case for all Residential centres, and therefore not all residential centres are suitable for higher density housing. The constraint of limited public transport in certain centres should be reflected in this typology.

Recognising Smaller Rural Centres

The draft Sydney Plan currently identifies four centre typologies—CBD, Commercial Centre, Retail Centre, and Residential Centre, with the latter described

as a lower-order centre supporting service-oriented jobs alongside higher-density housing, frequent shops, and accessible public transport. While this “new centres approach” may work well for metropolitan locations, it does not adequately recognise the smaller rural centres or villages in areas such as Wollondilly. These smaller centres typically lack the full mix of services, walkable catchments, frequent public transport, or higher-density residential development captured in the Residential centre typology.

Smaller towns and villages in peri-urban locations like Wollondilly are integral to the daily life of their local communities and the surrounding agricultural areas, providing essential social, commercial, and community functions that support residents in their immediate area, yet their scale, function, and constraints are not captured within the existing typologies. Their scale and function are distinct from metropolitan centres, and they should not be treated as urban capable land nor be subject to substantial intensification requirements.

To better reflect these realities, the Plan should introduce additional typology for smaller rural centres or villages, recognising their role in servicing nearby communities, guiding appropriate planning and investment, and maintaining the character and capacity of these centres. This typology should provide a framework for local service provision and infrastructure without applying metropolitan-style development expectations, particularly for areas outside the mapped Urban Footprint. .

It is recommended that:

33. Wilton Town Centre is classified as an emerging Commercial centre (rather than an emerging Retail centre).
34. The Residential centre typology is updated to recognise that not all centres have access to frequent busses, and therefore not all are capable of contributing to the provision of higher density housing.

11. Open Space Infrastructure & Blue-Green Grid (Response: #7)

Appendix F – Public open space provision, classifies ‘Open Space’ as “*RE1 Public Recreation, C2 Environmental Conservation and C3 Environmental Management zoned land, part of Callan Park, Rouse Hill Regional Park and Western Sydney Parklands*”. This is an inaccurate presentation of open space as not all of this land is publicly accessible (e.g. C2 and C3) and it is therefore unable to meet their passive and active open space needs of the current and future community.

The resulting mapping within *Figure 28: Open Space Precincts*, *Figure 30: Public Open Space Provision* and *Figure 39: 5-year High Priority Open Space* does not indicate the undersupply of open space in Macarthur and south west Sydney. Whilst there is significant Conservation zoned land within the Shire, open space (RE1 Public Recreation) is required to be planned and provided for. Rather, based

on the maps, the Plan only proposes investment in the east of Sydney. The misrepresentation of available open space is not supported, as it will have serious impacts on investment and future planning decisions, resulting in substandard community outcomes.

Additionally, the green-grid corridor provides more than public open space, as it also contributes to urban heat and air quality, and this should be recognised by the Plan. For example, the role of Wollondilly as the 'green lungs' of Greater Sydney should be recognised within the blue-green grid in Appendix G.

It is recommended that:

35. Open space mapping distinguish publicly accessible areas from conservation land to accurately reflect community access and support planning and investment decisions.
36. The Plan needs to recognise the environmental benefits of the blue-green grid, beyond the provision of open space, including recognising Wollondilly's position as the "green lungs" of Greater Sydney and capturing blue-green grid infrastructure within Wollondilly.

12. Minimising the impact of Natural Hazards to communities (Response #9)

Most residential areas within Wollondilly are either bushfire prone and/or contain flood prone land. These risks are further compounded by limited and constrained evacuation routes that present challenges to timely evacuation during times of emergency. As such the need to manage and mitigate exposure to these risks as well as thoroughly consider the cumulative impact of any additional development is paramount.

The Plan needs to include stronger actions to give effect to the key policy goal identified within the plan of *"maintain level of risk for existing communities in areas with high natural hazard risk by reducing pressure on key evacuation routes"*.

Action 9.7 – Disaster Adaptation Plan Implementation

Action 9.7 requires councils to prepare Disaster Adaptation Plan (DAP) implementation plans for the Hawkesbury-Nepean Valley DAP. Clarification is sought on how this aligns with the NSW Reconstruction Authority's DAP Guidelines, as DAPs are intended to be prepared at a regional scale and led by the NSW Reconstruction Authority. It is also unclear whether the implementation plan is a new requirement in addition to the DAP, which will already outline actions to reduce or adapt to natural hazard risk. The Hawkesbury-Nepean Valley DAP has not yet been finalised, and it is uncertain whether councils will have sufficient time to develop an implementation plan before reviewing their Local Strategic Planning Statements.

It is recommended that:

37. Clarification be provided on the purpose, scope, and timing of DAP implementation plans to ensure alignment with the regional DAP and feasibility for councils.
38. The Plan is to include stronger actions to ensure that we maintain or reduce the level of risk for existing communities in areas with high natural hazard risk by reducing pressure on key evacuation routes.

13. Urban Heat (Priority: Resilience, Response: #9 & #12)

Whilst the draft Sydney Plan references urban heat, there is an absence of reference to the social and health implications this issue has, and how these can be mitigated. The implications of urban heat will increase over the life of this Plan, and therefore there should be a stronger stance regarding how this will be addressed.

It is recommended that:

39. The Plan is updated to reflect the social and health implications of urban heat, and include how this hazard will be mitigated.

14. Aboriginal Outcomes

The inclusion of the 'Aboriginal Outcomes' priority within the Plan is supported, however clarification is sought to ensure this is not a tokenistic inclusion. The draft Sydney Plan identifies this priority as applying to a number of Responses regarding housing, hazards and the environment. However, the information within these Responses does not provide a clear or actionable pathway for how this priority will be achieved.

The ambition within the priority cannot realistically be delivered through a high-level regional plan alone. The absence of direction and specific mechanisms in the draft Sydney Plan will make it difficult for councils to translate this priority into actionable measures within their Local Strategic Planning Statements.

There are no complementary mechanisms, governance structures, or resourcing commitments identified to support implementation in practice.

The wording in the Plan relating to Aboriginal cultural heritage could be interpreted as requiring the identification of specific sites in local environmental plans, which may not reflect the draft Sydney Plan's intended approach. Adjusting the wording to clearly convey this intent would reduce the risk of misunderstanding or misinterpretation.

Further guidance would also be helpful to support councils in understanding how this priority can be implemented in practice, for example, by embedding considerations of Aboriginal cultural heritage in building, site, and place design. This may include guidance for or provision of standardised clauses and controls regarding caring for country, for Local Environmental Plans or Development Control Plans.

It is recommended that:

40. Further guidance is provided to councils to ensure Aboriginal Outcomes can be genuinely considered during local strategic planning decision making, including guidance for or provision of standardised clauses and controls regarding caring for country.

15. Mapping & Data Matters

Key issues regarding mapping include:

- **General Legibility:** The provided maps are difficult to interpret and would benefit from being presented in a more legible and user-friendly format to ensure they can be clearly applied in future planning. Lack of legibility of maps undermines confidence in future local planning decisions. For example, each map should have Local Government Boundaries and labelled key features e.g. train lines, regional roads.

- **Scope of mapping:** Update all relevant maps to clearly define Greater Sydney and its surrounds to ensure all of the peri-urban areas covered under the plan are appropriately and consistently defined and recognised in the mapping.
- **Urban Footprint:** As noted in this submission, adjustments to the mapping of rural towns, including Picton, Tahmoor, Camden Park and Warragamba/Silverdale, must be made once the role and function of these towns as true non-urban capable areas (outside the Urban Footprint) has been clearly established.
- **Transport Provision:** As previously noted, the South Coast & Illawarra Train Line should be differentiated to indicate that it does not directly connect with the Greater Sydney train network, as the line is not electrified.
- **Western Sydney Parklands:** The mapping of Western Sydney Parklands is a misrepresentation, as Penrith Lakes, Fernhill, and Sydney sites should all be coloured to show where government land is.
- **Figure 10 Historical Urban Growth (p15):** The key of this figure is covering parts of Wilton and Appin, and should be moved so historical growth is clearly represented in the Plan.
- **Figure 13 Planned Housing Growth (p20):**
 - Bradfield and the surrounding Aerotropolis precincts are identified as a growth area, however the majority of this land is for industrial and employment uses, with limited mixed-use housing provided. This should be updated to reflect the intended housing growth, compared to growth areas for other employment uses.
 - The Low and Mid-Rise Housing Exclusion Area is not identified for the Wollondilly LGA.
- **Figure 27 Heat Vulnerability Index (p37):** This map seems to misrepresent the urban heat significance in greater south western and western Sydney. It is requested this map is updated to 2026, rather than the current 2022 version, and/or forecast vulnerability over the next 20 years, to ensure it is considered as part of strategic planning decisions.
- **Figure 30 Public Open Space Provision (p40):** As previously noted, the consideration of C2 and C3 zoned land as part of the provision of open space does not accurately represent land accessible to the community. This should be represented by RE1 Public Recreation zoned land, which would accurately depict the accessibility of open space in the region.
- **Figure 32 Housing Typologies (p46):** Should be updated to include larger lot styles (e.g. large lot residential), which the LGA currently provides.
- **Figure 40 Industrial Lands (p59):** As previously noted, this Figure should include the Moreton Park industrial land planning proposals, which have been

identified as 'Future employment land' within the Greater Macarthur Growth Area Structure Plan.

- **Figure 43 Sydney's natural landscapes (p66):** Areas identified as 'biodiversity value' are incorrect, as the Greater Blue Mountains World Heritage Area and Scenic Conservation Areas contain biodiversity values.
- **Images:** The location of all images used should be identified under each image.

It is recommended that:

41. The corrections and amendments to figures, mapping and images identified within this submission are addressed prior to finalisation, and Council is consulted where clarification is required.