

An aerial photograph showing a vast rural landscape with green fields, scattered houses, and some industrial buildings. In the far distance, a city is visible under a blue sky with white clouds. A diagonal orange line runs across the top of the image.

PENRITH

DRAFT RURAL LANDS STRATEGY

COMMUNITY ENGAGEMENT REPORT

AUGUST 2022

PENRITH
CITY COUNCIL

penrithcity.nsw.gov.au

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Statement of Recognition of Penrith City's Aboriginal and Torres Strait Islander Cultural Heritage

Council values the unique status of Aboriginal people as the original owners and custodians of the lands and waters, including the land and waters of Penrith City.

Council values the unique status of Torres Strait Islander people as the original owners and custodians of the Torres Strait Islands and surrounding waters.

We work together for a united Australia and City that respects this land of ours, that values the diversity of Aboriginal and Torres Strait Islander cultural heritage and provides justice and equity for all.

About this report

This document is the Community Engagement Report relating to Penrith City Council's draft Rural Lands Strategy which was publicly exhibited from 5 April to 17 May 2022.

Disclaimer

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1 Executive Summary

This report outlines the feedback received in response to public exhibition of the draft Rural Lands Strategy. The draft Rural Lands Strategy provides a strategic approach to managing the economic, social and environmental values of Penrith City's rural lands over a 20-year period.

The public exhibition process was guided by Council's Community Engagement Strategy. The purpose of the public exhibition was to give the community an opportunity to provide feedback. Community feedback plays an important role in establishing Council's vision and directions for the rural lands in the Penrith Local Government Area (LGA). The public exhibition activities were held between 5 April and 17 May 2022.

The public exhibition activities attracted over **218 responses** across various channels including:

- 53 formal written letter or email submissions
- 54 hardcopy feedback forms completed at drop-in sessions
- 111 online surveys completed

A majority of all responses (58%) were received from 'local residents across rural lands in the Penrith LGA', with a broad representation of the community in terms of age and gender; and included people with a disability, Aboriginal and Torres Strait Islander people, and people from culturally and linguistically diverse backgrounds.

Both the hardcopy feedback forms and online surveys asked respondents to select their 'level of agreement or disagreement with the five priorities and outcomes for Penrith City's rural lands provided in the draft Rural Lands Strategy'. Overall, respondents indicated their level of agreement with the priorities put forward by the Strategy as follows:

- Priority 5: Provide housing and services to meet the needs of the community (100 respondents or 61% agreed)
- Priority 3: Preserve open spaces, natural beauty and cultural connections (83 respondents or 50% agreed)
- Priority 4: Support a diverse rural community (83 respondents or 50% agreed)
- Priority 2: Protect ecological health and biodiversity (74 respondents or 45% agreed)
- Priority 1: Secure the rural edge (63 respondents or 38% agreed)

The online survey and hardcopy feedback forms also provided respondents with an opportunity to provide additional comments in their own words. These freeform comments were grouped into broad themes and the most common emerging themes were:

- Support for further subdivision and/or rezoning for urban development, either generally or in a specific location
- Concerns about the impact of heavy vehicle movements on rural character and amenity
- Concerns about the impact of development on the natural environment and biodiversity
- The importance of preserving cultural heritage in our rural areas
- Concerns about the condition and adequacy of infrastructure and services in rural areas
- The need for better communication and engagement with the rural community

Formal submissions were received from NSW Government agencies, community and industry groups, and private individuals or landowners. General support was expressed in close to one third of formal written submissions, with many commending the Council on the strategic approach of the draft Rural Lands Strategy, or providing comments for consideration in finalising the document.

Common themes emerging from the formal written submissions were:

- Concerns about defining a hard 'rural edge' precluding consideration of future housing opportunities
- Stakeholder nomination of sites for rezoning (commercial, industrial, agribusiness uses)
- Support for subdivision to create smaller 'rural residential' lots (<2ha)
- Meeting the future housing needs of an ageing rural population (rural villages)
- Stakeholder concerns about sites designated as 'highly visually sensitive landscape' and 'scenic and cultural landscape'
- Concerns about the impact of certain rural businesses on rural character and amenity ('big shed' developments and heavy vehicles)
- Concerns about the impact of development on the natural environment and biodiversity
- The importance of local knowledge and community involvement in planning and decision making (opportunity for Council to collaborate with the community to implement the Strategy)
- The need for better communication and engagement with the rural community
- Inconsistencies in the draft Strategy

The issues raised in feedback received during the public exhibition period of the draft Rural Lands Strategy will be incorporated into an amended Strategy document where appropriate. This finalised Strategy will be reported to Council seeking endorsement.

2 Introduction

The draft Rural Lands Strategy provides a strategic approach to managing the economic, social and environmental values of Penrith City's rural lands over a 20-year period.

The draft Rural Lands Strategy forms one component of the Places of Penrith strategic planning framework, which will establish the vision and directions for the Penrith LGA. Other components of Places of Penrith, the Employment Lands Strategy and Green Grid Strategy, were adopted in 2021. A further component, the draft Local Housing Strategy, has been prepared and exhibited concurrently with the draft Rural Lands Strategy as they have a complementary relationship aimed at focusing residential development in urban areas to protect and enhance the role of rural areas. A fifth component, the Corridors and Centres Strategy, is underway and will continue to build on the themes of the community engagement undertaken for the draft Rural Lands Strategy, particularly with respect to the rural villages.

The development of the Rural Lands Strategy was identified as an immediate action (Action 17.1) under Planning Priority 17 of Council's Local Strategic Planning Statement (LSPS) to 'define and protect the values and opportunities within the metropolitan rural area'.

The draft Rural Lands Strategy was publicly exhibited from 5 April to 17 May 2022. Community members and stakeholders were given an opportunity to provide comment. An updated Rural Lands Strategy will be prepared addressing issues raised during the public exhibition period. This report outlines the community response and feedback received in relation to the draft Local Housing Strategy.

3 Public Exhibition and Engagement Activities

The draft Rural Lands Strategy was publicly exhibited alongside the draft Local Housing Strategy. The public exhibition was held between 5 April to 17 May 2022. The six-week exhibition period provided the community with an opportunity to provide feedback and play an important role in establishing the vision and directions for the Penrith LGA.

The public exhibition was advertised through a variety of channels:

- Council's Your Say Penrith website (and linked to from Council's main website homepage)
- Council's social media pages (Facebook, LinkedIn and Instagram)
- Direct email notification to relevant NSW Government agencies and stakeholder organisations
- The Mayoral Column (8 April 2022) in the Western Weekender.

Communication Channels

Stakeholders and the community were invited to provide feedback through a variety of channels including:

- A hard copy feedback form made available during community drop-in sessions
- An online survey on the Your Say Penrith website

- Written submissions emailed/posted to Council
- Council’s social media posts (Facebook, LinkedIn, Instagram).

Direct Engagement

Council staff attended three Village Café community support events and three further locations to speak to the community about the draft Local Housing Strategy along with the draft Rural Lands Strategy. Community Drop-in Sessions were as follows:

- Village Café, Kingswood (Thursday, 14 April 2022, 9.30am-11.30am)
- Village Café, North St Marys (Thursday, 21 April 2022, 9.30am-11.30am)
- Community Drop-in Session, Mulgoa Hall (Tuesday, 26 April 2022, 6pm-8pm)
- Village Café, Llandilo (Thursday, 28 April 2022, 9.30am-11.30am)
- Community Drop-in Session, Penrith Library Theatrette (Thursday, 28 April 2022, 6pm-8pm)
- Community Drop-in Session, Berkshire Park Hall (Thursday, 12 May 2022, 5pm-7pm)



Figure 1: Kingswood Village Café



Figure 2: North St Marys Village Café



Figure 3: Llandilo Village Café



Figure 4: Mulgoa Hall Drop-in Session

4 Engagement Response

The public exhibition activities attracted over **218 responses** across the various communication channels.

The draft Rural Lands Strategy Your Say Penrith webpage attracted 1,750 page views, 838 visitors to the page, and 355 downloads of the Rural Lands Strategy, resulting in:

- The 'Your Say Penrith' online survey attracting a total of **111 responses** from residents, workers, property owners and visitors.
- The Community Drop-in Sessions receiving **54 hard-copy feedback form responses** from residents, workers, property owners and visitors.
- **53 formal written submissions** being received including from community groups and NSW Government agencies.

The majority of respondents (41%) used a search engine to access the Your Say Penrith website. 25% visited the Your Say Penrith webpage directly, 27% were referred to the Your Say Penrith page from the Council website while only 5% were referred from social media.

Social Media

- Council published **7 social media** posts about the draft Rural Land Strategy and draft Local Housing Strategy on Facebook, LinkedIn and Instagram. The social media posts had a reach of 15,976, generating 121 reactions, and 140 engagements.

4.1 Formal Written Submissions

There were **53 formal written submissions** from stakeholders and community members providing comment by way of letters or emails. The comments were acknowledged and considered along with the other feedback received.

Formal submissions were received from:

- 4 NSW Government agencies:
 - NSW Department of Primary Industries (NSW DPI) Agriculture
 - NSW Department of Regional NSW – Mining, Exploration & Geoscience (MEG) – Geological Survey of NSW (GSNSW)
 - Environment Protection Authority (EPA)
 - Transport for NSW (TfNSW)
- 4 community groups
 - Berkshire Park & Llandilo Community Group
 - Friends of Fernhill and Mulgoa Valley Inc. (FFMV)
 - Mulgoa Valley Landcare Group
 - Wallacia Progress Association Committee
- 2 industry groups or other organisations
 - Urban Development Institute of Australia NSW (UDIA NSW)
 - Deerubbin Local Aboriginal Land Council (Deerubbin LALC)
- 43 private individuals or landowners

The detailed issues raised in these formal submissions and responses are provided in Appendix A.

In summary, the formal submissions addressed several broad themes:

Concerns about defining a hard ‘rural edge’ precluding consideration of future development opportunities

A large proportion of the formal submissions raised concerns about the priority to ‘secure the rural edge’. These were largely from landowners who believe their rural properties have greater development potential. To this end, several submissions requested that certain precincts/areas be designated as urban investigation areas, or otherwise investigated by Council for future residential, industrial or commercial development – typically parts of Berkshire Park, Llandilo, Londonderry, Mulgoa and Luddenham.

UDIA recommended that Council investigate the Northern Road Corridor for future housing, while other submissions objected to the rural classification of land in Mulgoa, arguing it has potential as a future strategic growth area or nominated landholdings in Luddenham for future housing development, citing proximity to the Western Sydney Aerotropolis and potential to contribute to future housing growth.

Stakeholder nomination of sites for rezoning

Several private individuals and one community group, the Berkshire Park & Llandilo Community Group, disagreed with preserving the RU4 Primary Production Small Lots zone, arguing this area is not suitable for farming and the small lots are no longer financially viable. The Group claimed residents are being discriminated against by not being permitted to develop. They therefore seek to have these areas rezoned for residential uses.

Other submissions referred to rural properties in Luddenham being reserved for ‘green space’ and requested Council rezone these areas for agribusiness. Another submission requested land in Llandilo be rezoned for commercial or industrial land uses.

Support for subdivision to create smaller ‘rural residential’ lots

Several submissions argued that the current minimum lot sizes in areas such as Londonderry, Castlereagh, Cranebrook, Llandilo, Wallacia Village (East) and the Rural North East should be reconsidered with a view towards allowing ‘moderate’ urban development – eg. subdivision of large lots into smaller lots of around 1-1.5 acres.

Meeting the future housing needs of an ageing rural population

Two submissions raised concerns about housing for an ageing population in the rural area citing the current villages of Londonderry, Wallacia and Luddenham will not cater for the needs of this demographic group in the future. Other submissions however identified the need for affordable housing in the rural area, particularly for the ageing population wanting to age in the area of their long-term residence.

One respondent also pointed out the need to ensure housing diversity and choice while also considering existing infrastructure, transport links and services when planning for housing for an ageing population in rural lands.

Stakeholder concerns about sites designated as ‘highly visually sensitive landscape’ and ‘scenic and cultural landscape’

Several submissions raised concerns about potential land use and development implications for specific sites and/or areas designated as ‘highly visually sensitive landscape’ or ‘scenic and cultural landscape’.

One submission argued that certain landholdings forming part of the broader Queens Hill precinct in Luddenham do not hold scenic significance and should be investigated further before adoption of the draft Rural Lands Strategy. Another submission expressed concern with respect to landholdings being designated as ‘highly visually sensitive’, citing potential constraints on the future development of the land. This concern was repeated in numerous other submissions seeking further explanation and information on related development restrictions and land use controls.

On the other hand, the Friends of Fernhill and Mulga Valley (FFMV) and one private individual advocated for actions and compliance with DCP controls to ensure protection of identified ‘highly visually sensitive’ and ‘scenic and cultural’ landscapes. They also recommended that Council ensure appropriate measures to retain Mulgoa Road as a scenic rural road. Wallacia Progress Association recommended that the Rural Lands Strategy consider Park Road as a highly visually sensitive and heritage and cultural landscape.

Concerns about the impact of certain rural businesses on rural character and amenity

Several submissions raised concerns about the impacts of certain rural business activities, including recent approvals for ‘big shed’ structures which are seen as inconsistent with the prevailing rural character and amenity. They also cite difficulties in enforcing compliance with existing DCP controls relating to parking and storage of heavy vehicles in rural lands. Submissions also claim that adverse consequences of such developments have not been properly considered relative to the aims of the Rural Lands Strategy with respect to the Mulgoa Valley.

The Mulgoa Valley Landcare Group (MVLG) asserts that the eastern gateway to Mulgoa Village, which is ‘protected’ by a ‘scenic landscape’ overlay, has been compromised by the recent approval and construction of a large truck and excavator shed. MVLG submits this approval contradicts the draft Strategy which states *“Development within these visual gateways will be carefully managed to provide a safe, welcoming and positive experience that is definitely rural”*.

FFMV also suggests there is lack of clearly defined criteria and strategies in place to protect the Mulgoa Valley, as evidenced by the proliferation of large sheds, truck parking, containers on site without consideration of the effect these will have on the scenic values of the Valley.

Concerns about the impact of development on the natural environment and biodiversity

Several submissions expressed concerns over the impacts of new and proposed developments in the rural lands and sought assurance that biodiversity would be protected. While supporting the intent of the Strategy, some submissions questioned the approach to conservation of the natural environment noting that most rural landholdings in the Penrith LGA do not meet the minimum site area requirement for biodiversity stewardship agreements.

A number of submissions raised concerns about future land uses and development of the land owned by the Deerubbin Local Aboriginal Land Council (DLALC) on the character of the Rural North West Precinct. In particular, the submissions reject perceived Council support for the DLALC structure plan. MVLG asserts the Deerubbin proposal is incongruous with the Rural Lands Strategy.

The importance of local knowledge and community involvement in planning and decision making

Five submissions identified the importance of local knowledge and community involvement in planning and decision making. One submission identified the opportunity for Council to collaborate with the community to implement the Strategy.

The need for better communication and engagement with the rural community

Several submissions expressed disappointment and questioned the sufficiency of Council's engagement activities on the draft Rural Lands Strategy. A number of these reported the need to send letters directly to individuals and landowners within the rural lands to advise them of public exhibitions of Council strategies (eg. via traditional hardcopy post methods) as many members of the community do not have a reliable internet connection or access to the local newspaper. To this end, the submissions claim that rural landowners were not appropriately notified about the draft Rural Lands Strategy.

Two submissions asserted that Council should communicate directly with landowners who are likely to be impacted by the draft Rural Lands Strategy and argued that landowners must be allowed to make decisions about the development of their own land.

Inconsistencies in the draft Strategy

One submission referred to the map of mineral resources provided in the draft Rural Lands Strategy and stated that it was not precise. Several submissions noted that the areas of ecological value shown in figures in the Rural Lands Strategy differed from other documents. Another submission commented that Council should conduct an Aboriginal Cultural Heritage Study before adopting the draft Rural Lands Strategy.

Other comments

Some of the issues raised in submissions fell outside a particular theme. These typically related to matters outside of the scope of the Rural Lands Strategy, such as maintenance of local roads, footpaths and drainage infrastructure, and general concerns about community safety and Council rates. These matters are not deemed to warrant changes to the draft Rural Lands Strategy as they typically come under separate Council programs and strategies.

The matters raised in formal submissions and Council's response to these are addressed in Appendix A.

4.2 Community Drop-in Sessions – Hard-copy Feedback Forms

Who we heard from: Respondent profile

As part of the engagement activities, Council staff visited Council's three Village Cafés at Kingswood (14 April), North St Marys (21 April) and Llandilo (28 April) along with three dedicated drop-in sessions held at Mulgoa Hall (26 April), Penrith City Council Library Theatre (28 April), and Berkshire Park Hall (12 May) to speak to the community about the draft Rural Lands Strategy and the draft Local Housing Strategy.

It is estimated that over 150 people attended one or more of the drop-in sessions. The sessions at Mulgoa and Berkshire Park were particularly well attended by the community interested in the draft Rural Lands Strategy.

Drop-in sessions received a total of **54 feedback form responses** from residents, property owners and visitors throughout the direct engagement period for the draft Rural Lands Strategy.

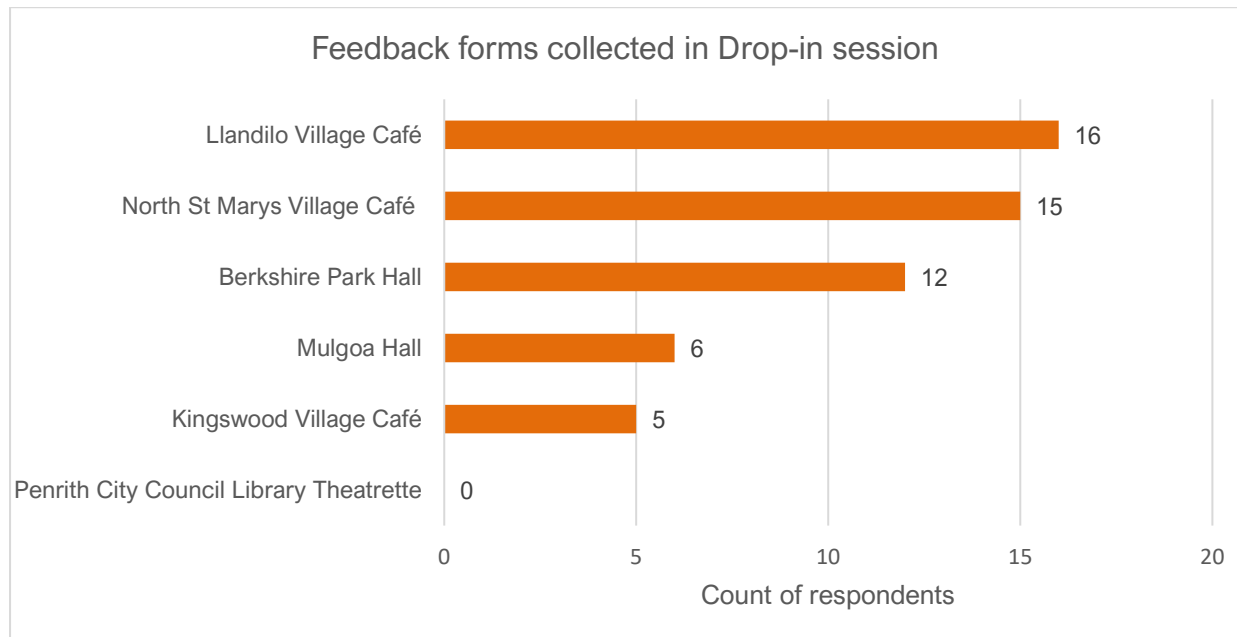


Figure 5: Feedback Forms respondents at the Drop-in Sessions

At the six community drop-in sessions a hard-copy feedback form was available for attendees to complete. It was designed to seek respondents' level of agreement with the five main priorities identified in the draft Rural Lands Strategy. The form also provided respondents with the opportunity to express their views and comments.

A disproportionately high number of forms relating to the draft Rural Lands Strategy were completed at the North St Marys Village Café given its urban location. This might be explained by staff at the session actively encouraging people to fill in the forms, compared to other sessions where staff were more intensely involved in conversations. No feedback forms were received at the drop-in session in the Penrith CBD due to the low number of attendees overall and the preference for attendees at this session to complete the separate feedback form which related specifically to the draft Local Housing Strategy.

Association with Penrith LGA

The majority of respondents identified as 'property owners in the Penrith LGA' comprising 67% of responses, while 15% of the respondents identify as 'a renter in the Penrith LGA'. Only 5% of the respondents identify as 'a worker in the Penrith LGA' and as 'a visitor to the Penrith LGA'. There were no respondents identifying as a 'business-owner' or a 'student' in the Penrith LGA. It should be noted that respondents could select multiple categories.

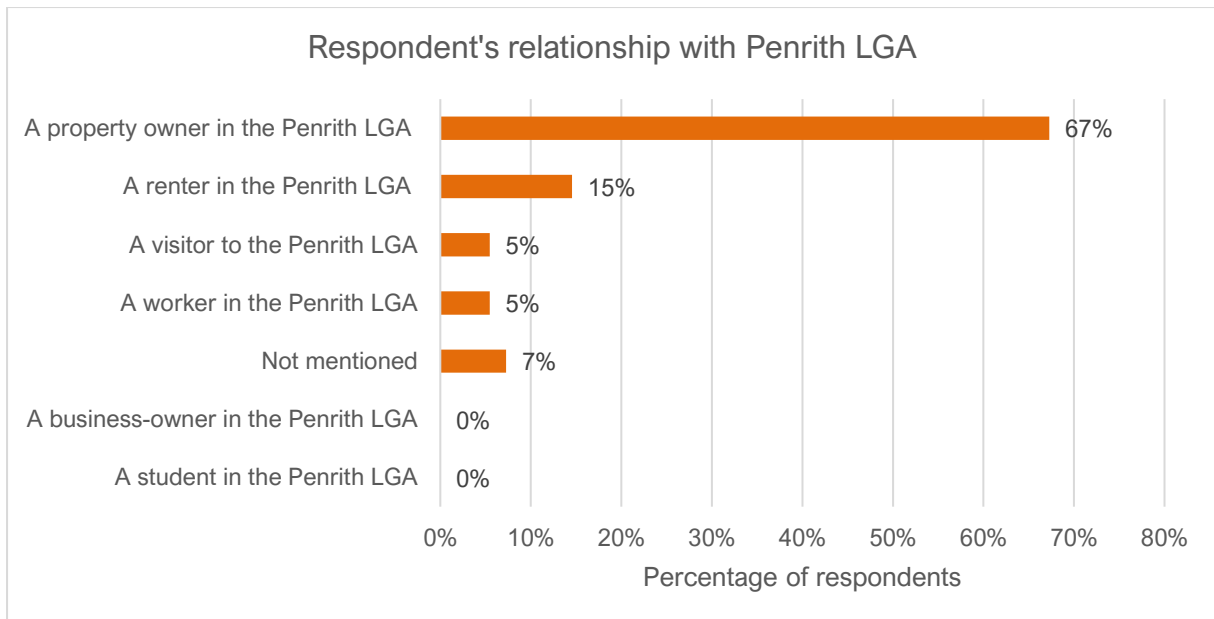


Figure 6: Survey respondent's relationship with Penrith LGA

Place of residence

Almost one third of respondents (35%) lived within the Cambridge Park, Jordan Springs and Llandilo suburbs. A very small number of respondents lived outside of the Penrith LGA in other suburbs Blaxland, Springwood and Bella vista.

Only 2%, or one respondent, provided responses from the following suburbs Castlereagh, Londonderry, St Clair and Orchard Hills.

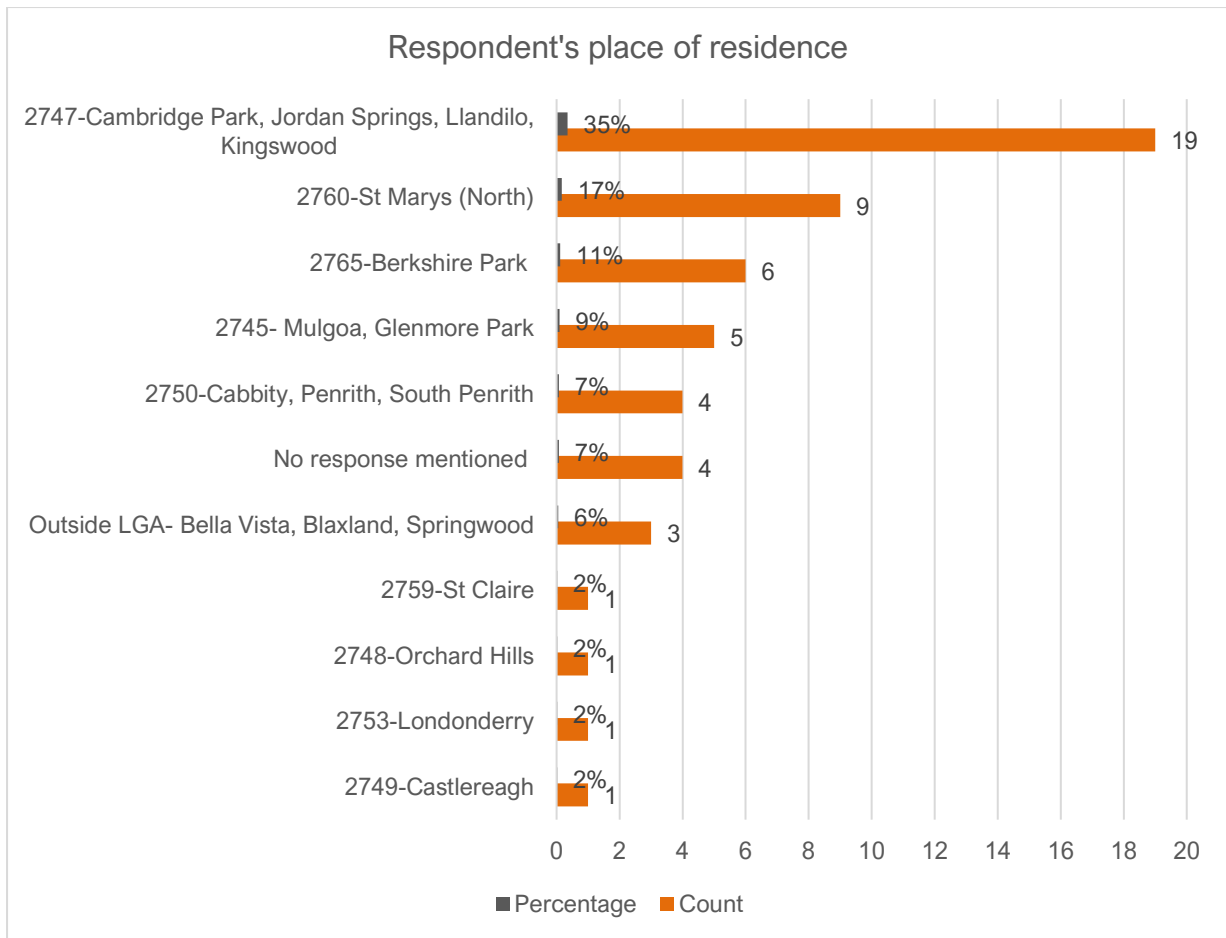


Figure 7: Survey respondents by residential suburbs

Age group

A significant number of the respondents were aged 65 and above, comprising 40% (21) of the responses, followed closely by those aged between 45 to 64 years old (36% or 19 respondents).

13% (seven) of the respondents were aged between 25-44 years old. There were no survey respondents aged between 18-24 years old.

Only 4% (two) of the respondents were aged under 18 years of age.

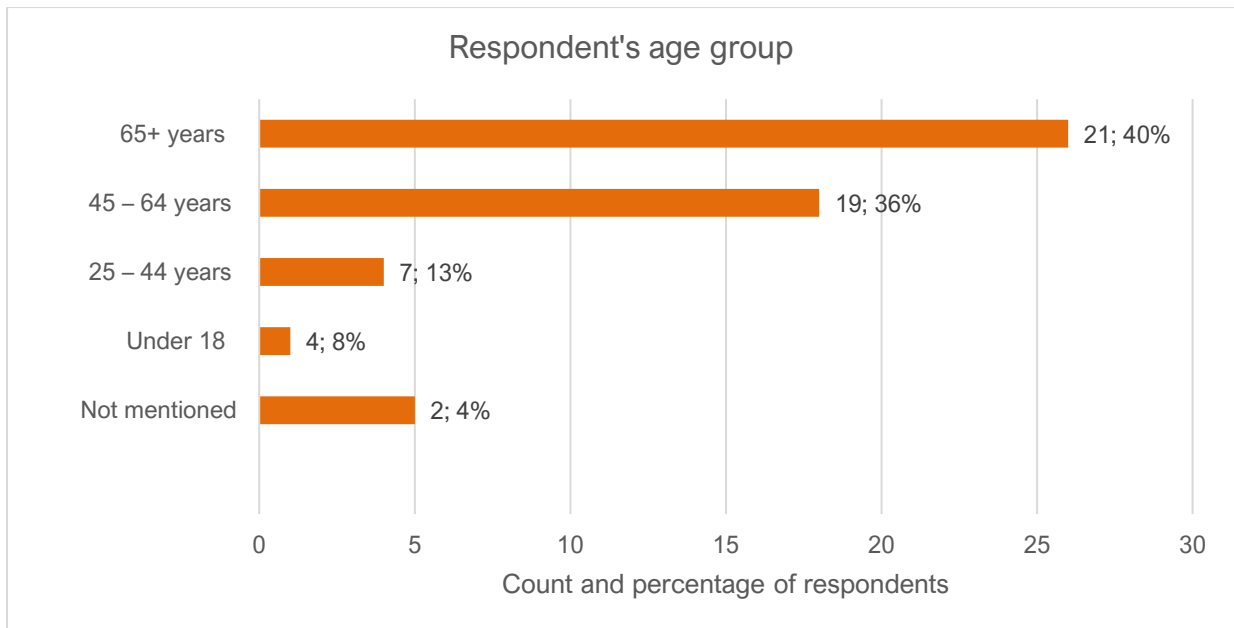


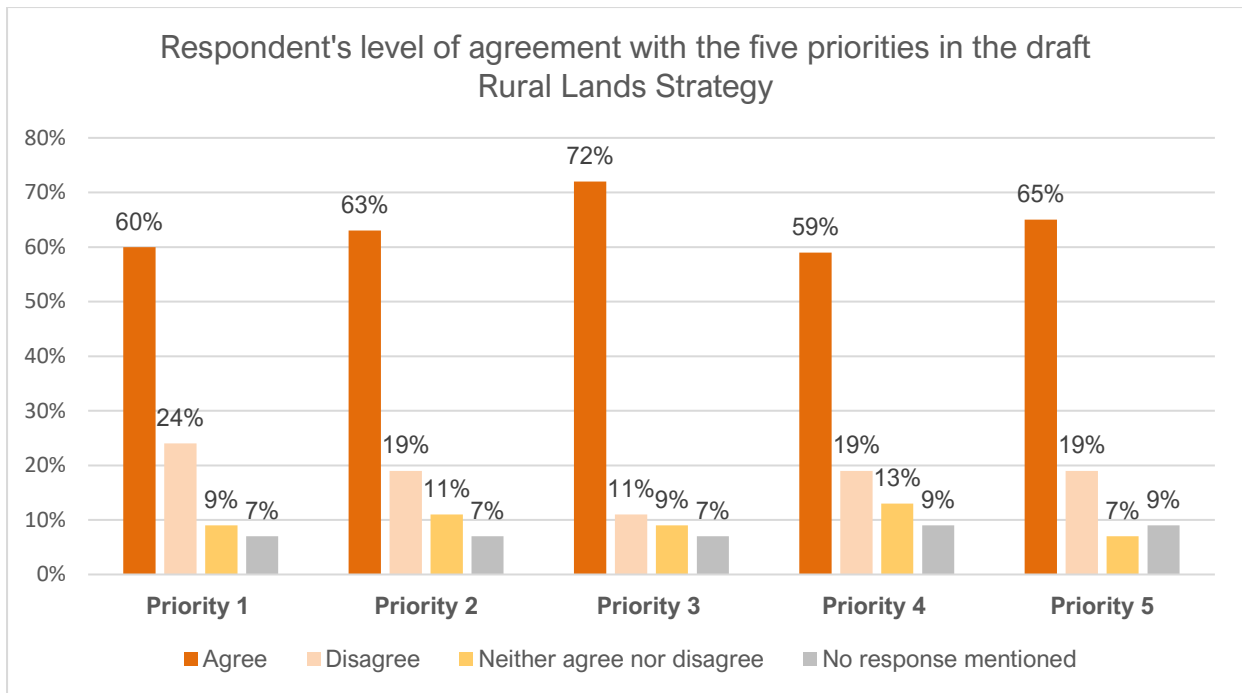
Figure 8: Survey respondent's participation by age group

Respondent's level of agreement with the five priorities of the Rural Lands Strategy

The hard-copy feedback form asked respondents to indicate their level of agreement or disagreement to the five priorities for Penrith City's rural lands provided in the draft Rural Lands Strategy (5-point Likert scale question – strongly disagree, disagree, neither agree nor disagree, agree, strongly agree). This same question was posed in the online survey on the Your Say website (results given separately below).

A significant majority of respondents agreed or strongly agreed with each of the five priorities as follows:

- Support for 'Priority 3: Preserve open spaces, natural beauty and cultural connections' was ranked first with 72%
- Support for 'Priority 5: Provide housing and services to meet the needs of the community' was ranked second with 66%.
- Support for 'Priority 2: Protect ecological health and biodiversity' was ranked third with 64%.
- Support for 'Priority 1: Secure the rural edge' was ranked fourth with 60%.
- Support for 'Priority 4: Support a diverse rural economy' was ranked fifth with 59%



4.3 Your Say Penrith Website – Online Surveys

Who we heard from: Respondent profile

The online survey attracted over **111 responses** from residents, property owners, business owners, workers and visitors.

The majority of the survey respondents identified as 'local residents' of the rural lands, comprising 87% of responses, while 18% of respondents identify as 'business-owners across rural lands in the Penrith LGA'.

12% of the respondents identified as 'visitors to the rural lands in the Penrith LGA'. Buying local farm produce, enjoying outdoor adventures such as bushwalking, visiting family and friends and accessing open spaces for physical activities were among the most frequently reported reasons for visiting Penrith City's rural lands.

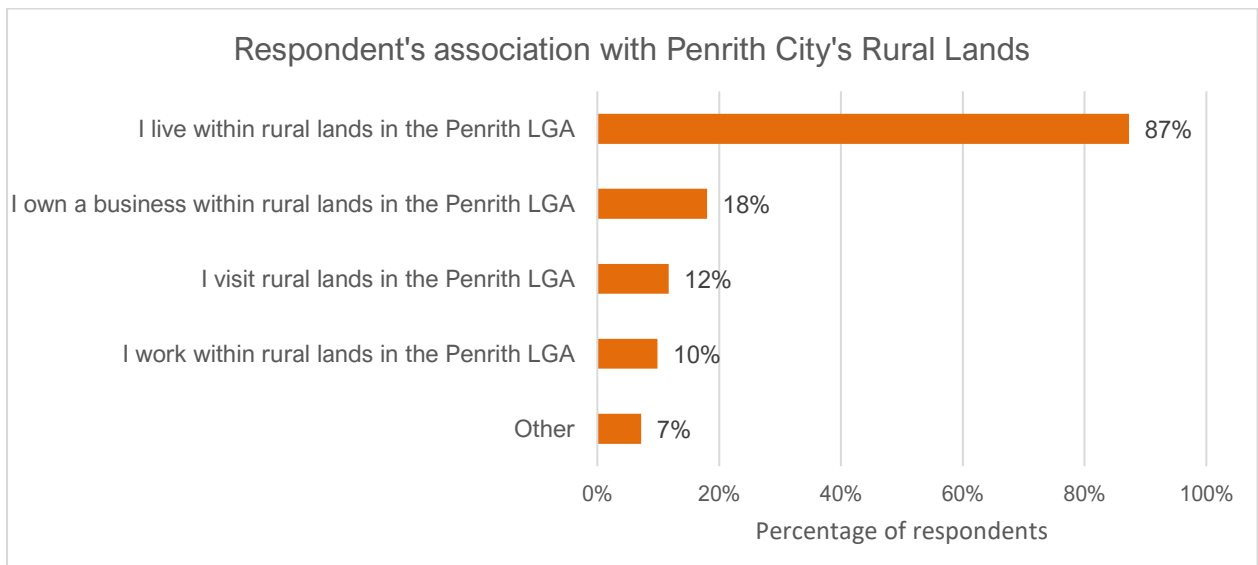


Figure 9: Survey respondent's association with Penrith City's Rural Lands

Place of residence

94 respondents provided their place of residence, while 17 respondents skipped this question.

More than three-quarters of the respondents were residents from the rural lands in the northern part of the LGA (Rural North West and Rural North East precincts). The number of respondents from the Rural South West precinct comprised 18% of all respondents. Only 6% of respondents were located in the Southeast Transition Precinct.

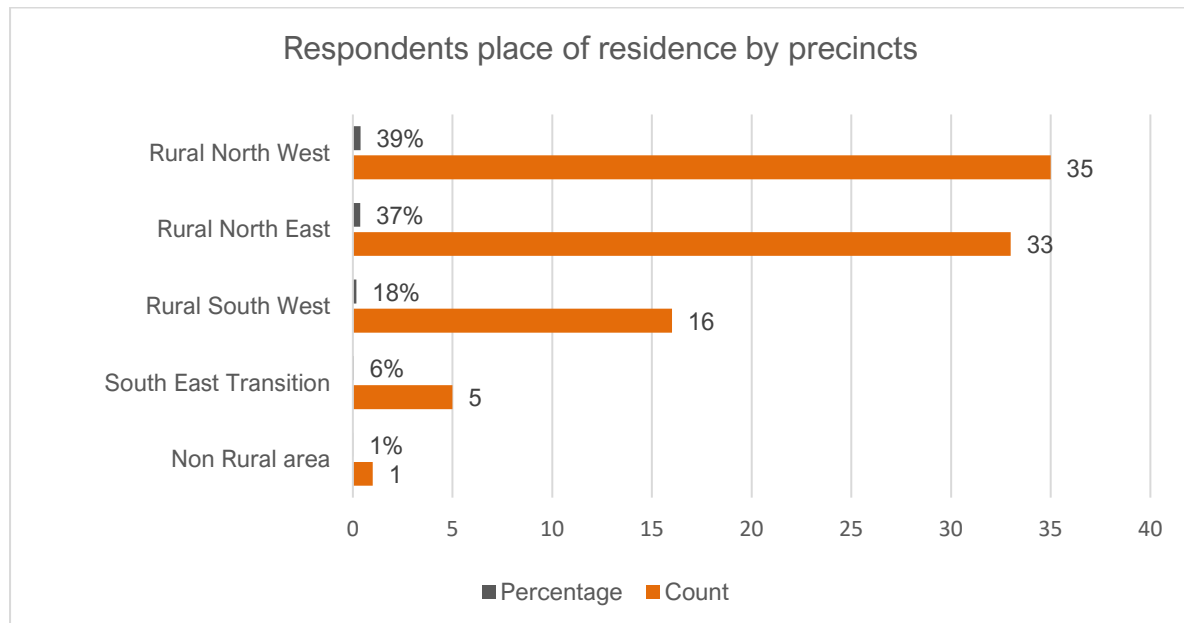


Figure 10: Survey respondents by residential precincts

The majority of the survey respondents identified as residents of Penrith LGA. Survey respondents who live in the Penrith LGA spanned across three wards, with the majority (31%) residing in the 2749 postcode area.

There were no survey respondents from Badgerys Creek (2555), Emu Plains, Penrith (2750) or Kemps Creek, Mount Vernon (2178) post code areas.

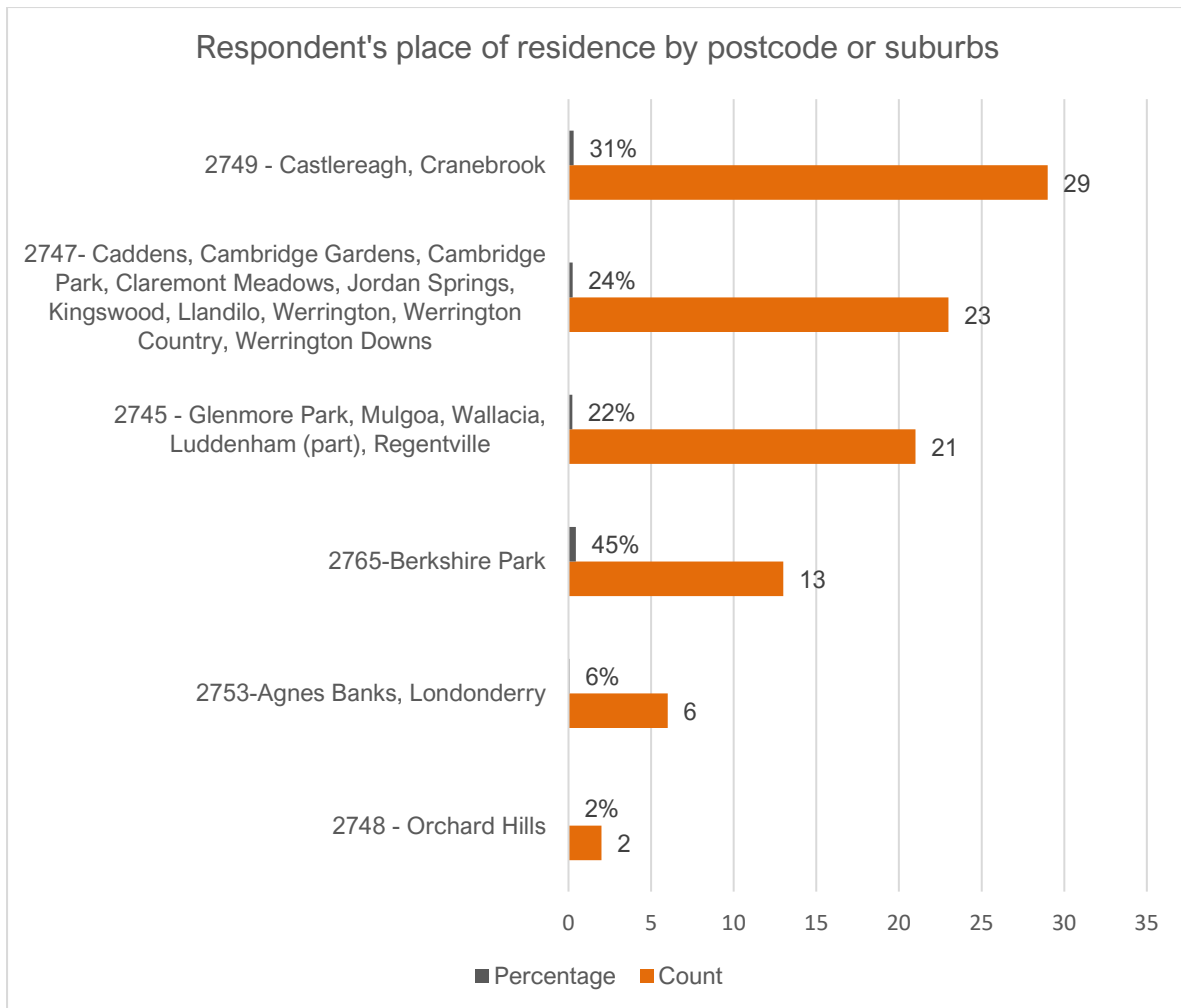


Figure 11: Survey respondent by residential postcode or suburbs

Age and gender groups

109 respondents provided their demographic information, while only two respondents skipped this question.

The level of participation of females and males was roughly equal with 50% and 48% participation respectively.

Almost half of the respondents were aged between 45-64 years old, followed by people aged between 25-44 years old, comprising 28% of the respondents. People aged 65 years or older account for 20% of the respondents, while less than 3% of respondents were aged between 18-24 years old. There were no survey respondents aged under 18 years old.

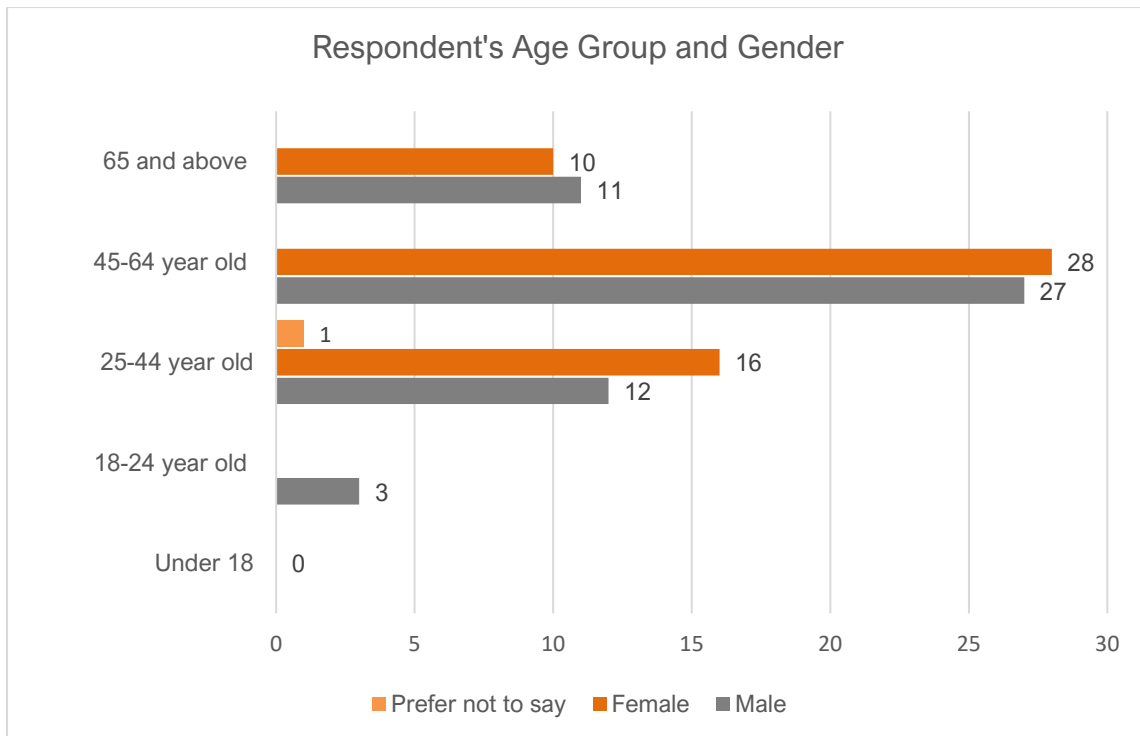


Figure 12: Survey respondent's participation by gender and age groups

Cultural and linguistic diversity

108 respondents provided their cultural and linguistic diversity information, while three respondents skipped this question.

4% of respondents identify as people of Aboriginal or Torres Strait Islander origin.

Almost all (98%) respondents speak English as a first language at home. 2% of the respondents identify as a person from a culturally and linguistically diverse background. Some of these described two different cultural backgrounds such as Maltese and Dharug (Aboriginal language).

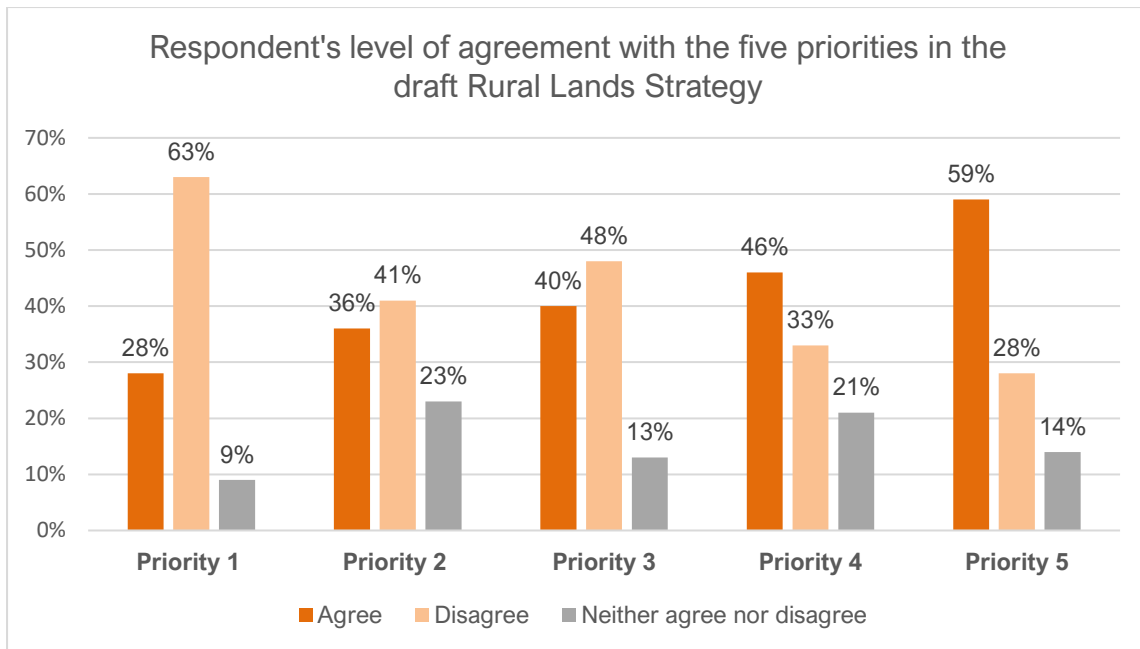
People with disabilities accounted for 4% of respondents.

Respondent's level of agreement with the five priorities of the Rural Lands Strategy

The online survey asked respondents to select the level of agreement or disagreement with the five priorities for Penrith City's rural lands provided in draft Rural Lands Strategy. This same question was posed in the hardcopy feedback forms at the drop-in session (results given separately above).

Respondents generally agreed with Priorities 4 and 5 relating to the rural economy and housing needs, respectively. There was a varied response to Priority 2 and 3 pertaining to open space, natural beauty and cultural connections and ecological health and biodiversity. Only 28% of respondents agreed with Priority 1 – Secure the rural edge.

Of note is the relatively high proportion of respondents who neither agreed nor disagreed with the priorities (particularly priorities 2 and 4).

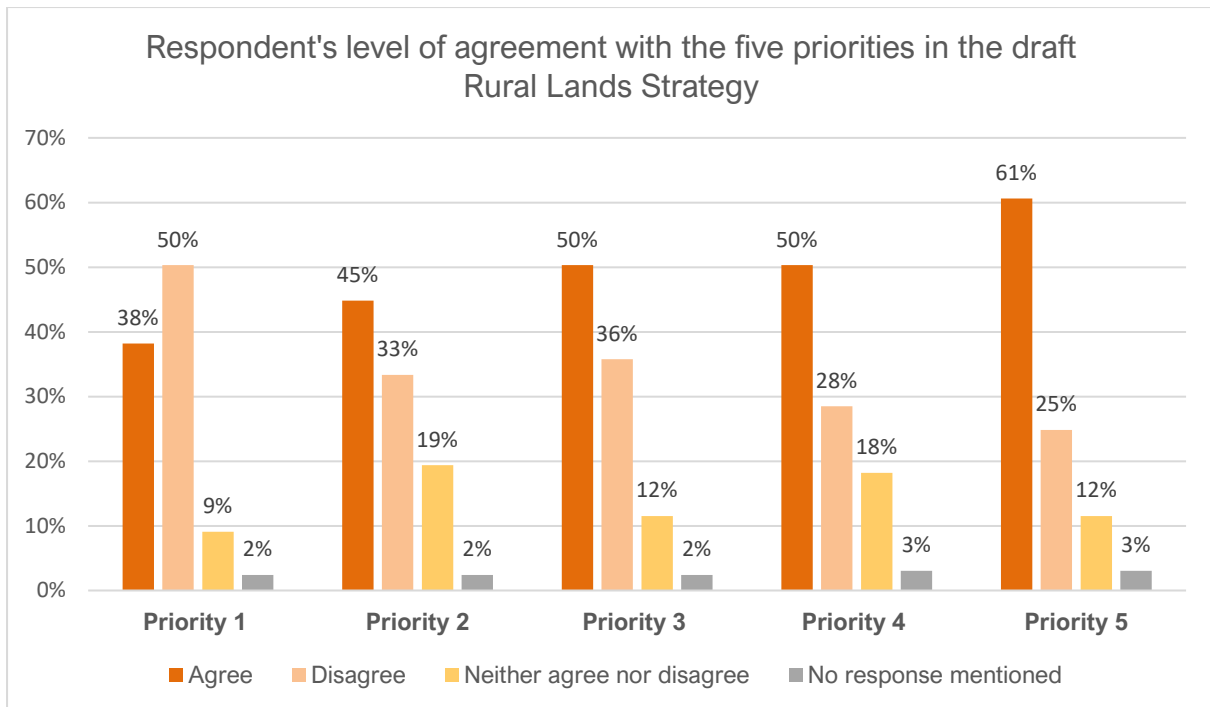


4.4 Combined results from feedback forms and online surveys

Level of agreement with priorities

Both the online surveys and hardcopy feedback forms asked respondents to select the level of agreement or disagreement with the five priorities for Penrith City's rural lands provided in draft Rural Lands Strategy.

Overall, respondents agreed with the priorities put forward by the draft Rural Lands Strategy. There was a higher level of disagreement with Priority 1 overall. Based on the freeform comments provided in the hard copy forms and online surveys, it is believed that this result reflects the section of the community who would like to see the rural lands rezoned for urban development or further subdivided into smaller lots. Notwithstanding, it is also noted that a substantial number of respondents agreed with Priority 1. Out of the 165 total respondents for Priority 1 half (50%) disagreed.



Open-ended question/freeform comments

Both the online surveys and hardcopy feedback forms provided respondents with an opportunity to provide additional comments, either elaborating on their previous responses or providing feedback in their own words.

These open-ended freeform comments cover the following broad themes, several of which correspond with those emerging through the formal submissions:

Support for further subdivision and/or rezoning for urban development, either generally or in a specific location

Many respondents stated their desire to be allowed to subdivide their rural properties into smaller allotments, be rezoned for urban development, or investigated for future housing development as part of an urban investigation area. A range of reasons were provided including:

- A good proportion of residents in Penrith rural lands do not farm for income therefore, they feel this land does not need to remain rural.
- As population grows more housing is required and Penrith City's rural lands provide an opportunity to provide affordable housing.
- The northern rural areas, particularly Berkshire Park, Llandilo and Londonderry, are surrounded by new urban subdivisions. Recent developments in Jordan Springs and Marsden Park were commonly cited as justification for rezoning and development.
- The southern rural areas, particularly Mulgoa and Wallacia, are well positioned to benefit from the growth and development of the Aerotropolis Precincts. On the flip side, amenity impacts and resulting changes to the rural character in this area was commonly cited as justification for rezoning and development. Restricting

development is also considered to deprive rural communities of the opportunity to grow and expand with the rest of Sydney.

As an alternative to intense or 'urban' scale development, many respondents said they would support a 'moderate' increase in development potential in the rural areas – eg. subdividing large lots into smaller lots of 1-1.5 acres instead of retaining the existing 2+ hectare minimum lot sizes.

Concerns about the impact of heavy vehicle movements on rural character and amenity

Several respondents raised concerns about the impact of heavy vehicle movements associated with rural business activities, especially in the Llandilo and Berkshire Park areas. Respondents typically cited the fact that rural roads are not constructed for regular heavy vehicle usage and requested the restriction of businesses relying on truck movements to protect the rural lands from adverse visual and noise impacts.

Concerns about the impacts of development on the natural environment and biodiversity

Many respondents expressed concerns over adverse effects of new developments on the rural lands' natural environment. They also sought assurance that biodiversity would be protected.

The importance of preserving cultural heritage in our rural areas

Some respondents raised concerns over impacts of recent developments on cultural heritage requesting better protection of these values.

Concerns about the condition and adequacy of infrastructure and services in the rural areas

Many respondents cited the need for better connected infrastructure and services in the rural lands. They requested better maintenance of drainage infrastructure to minimise localised flooding and raised concerns over the scarcity and overall poor quality of roads and footpaths.

The need to upgrade drainage infrastructure, provision of connected sewerage system to rural properties instead of existing septic tank system, maintenance of roads and regular supply of water for domestic and farming purposes were most frequently reported by respondents residing in rural lands such as part of Llandilo, Berkshire Park and Cranebrook.

Respondents also typically requested construction of additional footpaths and cycleways, filling of potholes, widening roads, constructing roundabouts and enhancing and upgrading street marking and road lighting to increase safety and allow better flow of traffic.

The need for better communication and engagement with the rural community

Many respondents raised concerns in relation to how the public exhibition of the draft Rural Lands Strategy was advertised. Common criticism and suggestions were the need to send letters directly to individuals and landowners within the rural lands to advise them of public exhibitions of Council strategies as the local paper does not get delivered and some members of the community do not have a reliable internet connection.

Other comments

Some of the respondents' comments fell outside a particular theme. These comments typically related to matters outside of the scope of the Rural Lands Strategy, such as general concerns about community safety and Council rates. These comments are not deemed to warrant changes to the draft Rural Lands Strategy as they typically come under separate Council programs and strategies. Notwithstanding, the issues raised will be forwarded to the relevant departments for consideration and review as appropriate.

5 Key issues raised and responses

The key issues arising across all the feedback and Council's response to these is as follows:

Development potential of Penrith's rural lands vs securing the Metropolitan Rural Area

A clear view was expressed in several submissions, online surveys and feedback forms that parts of our rural lands have potential for smaller lot subdivision or urban development (future housing).

Close to a third of all survey feedback received described 'further subdivision or rezoning of rural lands' as one of their top areas of concern that Council needs to address for rural lands in the Penrith LGA. A range of reasons were expressed to justify this view, such as Penrith rural lands not being viable for agriculture and the fact that agricultural activities do not generate sufficient income for landowners.

This issue dovetails with many of the submissions that came in on the draft Local Housing Strategy where several comments expressed a desire to develop rural properties for residential development. Interestingly, some submissions directly contradicted this view by objecting to the redevelopment of existing rural areas or raising concerns over housing deficiency within rural lands and the need to deliver housing choice and affordable housing as the population grows.

Response:

A key priority of the draft Rural Lands Strategy is to secure the rural edge. The draft Strategy considered the evidence available and concluded that further subdivision or urban development will not be supported in the rural lands due to:

- Need to maintain existing agricultural activities operating and reduce land use conflicts
- Lack of access to reticulated sewer
- Flooding impacts and limited evacuation capacity
- Significant areas of environmental significance
- The draft Local Housing Strategy finding that there is enough capacity to deliver necessary housing for the projected population in the existing urban areas and identified urban release areas.

Furthermore, the Greater Sydney Region Plan and Western City District Plan both identify the Penrith rural lands as part of the Metropolitan Rural Area (MRA) and highlight the need to maintain the economic, environmental and social values of the rural lands. The rural edge

identified in the draft Rural Lands Strategy reflects the MRA boundary. This principle is also reflected in Council's LSPS, with Planning Priority 17 recognising the need to define and protect the values and opportunities of the MRA.

The draft Local Housing Strategy and draft Rural Lands Strategy have been prepared and exhibited concurrently as they have a complementary relationship aimed at focussing residential development in urban areas, to protect and enhance the role of rural areas. The draft Local Housing Strategy demonstrates that housing demand up to 2036 can be accommodated in existing urban areas and within identified urban investigation areas. As such, it is difficult to justify the expansion of residential development, especially into rural lands. Furthermore, the NSW Government's 2022 Population Projections have revised down Penrith City's estimated future population, which suggests a likely lower demand for housing than previously anticipated. This further undermines any justification that Council may have to release further land for urban development.

Balancing competing interests (rural character and amenity concerns)

A number of respondents raised concerns with rural industries and business activities (including truck parking and storage) in the rural lands, citing rural roads as being unsuitable for regular heavy vehicle usage. Respondents typically requested the restriction of these businesses to protect the rural lands from adverse impacts such as noise and visual impact of this land use.

Similarly, several submissions raised concerns about the appropriateness of 'big shed' developments and their impacts on prevailing rural character and amenity (especially at identified visual gateways in Mulgoa Valley).

Response:

The draft Rural Lands Strategy already includes priorities to balance competing rural, residential, business and environmental interests in the rural lands, and proposed actions to strengthen Local Environmental Plan (LEP) and Development Control Plan (DCP) controls and prepare guidelines for truck parking and storage.

Irrespective, Outcome 4.3 Small businesses permitted in rural lands are supported and encouraged, will be reviewed to further clarify the extent to which some small businesses, such as truck parking and storage, will be considered in rural areas.

Meeting the needs of the rural community, including housing for an ageing population

This issue relates to the rural villages and whether they provide sufficient housing and housing options for people at different life stages. It dovetails with comments made in relation to the draft Local Housing Strategy about housing affordability and requests by rural landowners (as described above) to support further subdivision.

In particular, concerns were raised that the current villages (Londonderry, Wallacia and Luddenham) in the draft Rural Lands Strategy will not cater for the needs of the ageing population in all rural areas in the Penrith LGA. They pointed out the need to ensure housing diversity and choice as well as consideration of the existing infrastructure, transport links, services and increased impact of climate risk such as flooding and bushfires when planning for housing for an ageing population in rural lands.

Response:

This issue is largely addressed in Priority 5 of the draft Rural Lands Strategy. A diversity of housing can be delivered in rural villages that cater to different stages of life, not just aging. These developments do not need to be dedicated seniors housing as per the submitters' comments. It is intended that character statements will be developed for the rural villages which will help further define the existing and future character and provide direction for future change. Community engagement to assist in developing local character statements for the rural villages will be undertaken as part of the preparation of the Corridors and Centres Strategy.

Biodiversity and protection of the natural environment

Several comments raised concerns about biodiversity and advocated for the need to protect the natural environment in the rural lands. A number of these referenced the proposed development of land owned by the Deerubbin Local Aboriginal Land Council (DLALC) in the Rural North West Precinct and perceived Council support for the DLALC's Penrith Structure Plan. Several submissions objected to the Penrith Structure Plan proposal and considered it a significant and inappropriate impact on biodiversity and ecological habitat. Submitters generally sought assurance that biodiversity would be protected.

Other submissions commented on the need to provide greater public access to natural areas for recreation and tourism uses.

Response:

The protection of ecological health and biodiversity is a key priority of the Rural Lands Strategy and the document includes several actions to deliver on this priority. The Rural Lands Strategy also acknowledges the NSW Government's Cumberland Plain Conservation Plan and the fact that, once finalised, the conservation measures in this document will form the basis of conservation efforts across the Western Parkland City and Penrith LGA. In response to community concerns, the draft Rural Lands Strategy will be amended to provide clarity around the agreement between DLALC and the NSW Government, and confirmation that future uses on DLALC land will be subject to the assessment of the Penrith Structure Plan by the NSW Government. The outcome of this process will enable Council to respond to the structure plan in future.

Management of scenic and cultural landscapes and highly visually sensitive landscapes

The draft Rural Lands Strategy includes various actions to incorporate the findings of the Strategy relating to scenic and cultural landscapes, highly visually sensitive landscapes and rural vistas. Several submissions raised concerns about the potential development and land use implications for specific sites classified as 'highly visually sensitive landscape' and/or 'scenic and cultural landscape'. Several owners challenged the significance of their sites and requested to be removed from the classification.

Other submissions raised concerns more generally about the need to preserve scenic and cultural landscapes or suggested other areas for investigation/inclusion in the Strategy – in particular, greater emphasis on Mulgoa Valley.

Response:

The draft Rural Lands Strategy is underpinned by the Penrith Scenic and Cultural Landscapes Study which is a supporting technical document to the draft Strategy. The Study found that there are significant scenic values and cultural connections that are not on publicly owned land. As such, the draft Rural Lands Strategy proposes actions to protect and preserve these values through a variety of actions such as inclusion within the LEP and/or DCP. Any future amendments proposed to the LEP or DCP would require further engagement with the community.

Adequacy of communication and engagement with the rural community

A number of people expressed disappointment and questioned the adequacy of Council's engagement activities to communicate and consult with community on the draft Rural Lands Strategy. Most reported the need to send letters directly to individuals and landowners within the rural lands to advise them of public exhibitions of Council strategies either by post or letter as some members of the community do not have a reliable internet connection or access to local newspaper.

Several of the survey and feedback form respondents argued that rural lands landowners were not notified about the draft Rural Lands Strategy. One submitter believes that residents are not consulted on what is needed and wanted for the community. Meanwhile, other submitters expressed that Council should have communicated with landowners who are likely impacted by draft Rural Lands Strategy and argued that landowners must be allowed to make decisions about the development of their land.

Feedback from one respondent expressed that the survey form contained loaded questions forcing respondents to provide an answer that do not accurately reflect communities' views on the draft Rural Lands Strategy.

Response:

There was a variety of communication channels undertaken during the six-week public exhibition period for the draft Rural Lands Strategy, including the six community drop-in sessions, online survey, open-ended feedback forms and formal submissions. The range of channels used for engagement were considered a reasonable attempt at determining our community's needs and aspirations. It was not considered practicable to write individually to each and every resident and landowner in the rural lands on this occasion, given the draft Strategy does not propose any changes to existing zonings or planning controls at this stage. Notwithstanding, implementation and evaluation of the Strategy should continue to engage with our community. In addition, further work and community consultation on rural villages will be undertaken as part of the Corridors and Centres Strategy which is currently under development.

6 Proposed changes to the Strategy

As a result of the feedback received the following changes are proposed to the Rural Lands Strategy:

- Addition of reference to Risk-based Framework for Considering Waterway Health Outcomes in Strategic Land Use Planning Decisions.
- Review of text to clarify small businesses that are acceptable in the rural lands, and highlight the need to balance competing lifestyle/environmental interests.

- Review of text regarding Mulgoa Road to include further detail relating to Council’s aspirations/vision for this State road.
- Clarification around the agreement between DLALC and NSW government and confirmation that future uses on DLALC land will be subject to the assessment of the Penrith Structure Plan by the NSW Government. The outcome of this process will enable Council to respond to the structure plan in future.
- Investigation of additional rural views suggested for the Mulgoa Valley and inclusion where appropriate.
- Deletion of text suggesting the need to enhance vegetation along Castlereagh Road to screen quarry activities.
- Inclusion of reference to the existence of extensive agriculture, including grazing.
- Correction of green grid connections shown in the Rural South West Precinct map (Figure 19).
- Inclusion of reference to ‘community’ as one of the key groups that Council will collaborate with to implement the Strategy.

7 Next Steps

The issues raised in feedback received during the public exhibition period of the draft Rural Lands Strategy will now be incorporated into an amended Strategy document. This finalised Strategy will be reported to Council seeking endorsement.

8 Appendix

Appendix A

Responses to issues raised in formal submissions to the draft Rural Lands Strategy

| Submitter / Issue Raised | Response |
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| NSW Government Agencies | |
| Environmental Protection Authority (EPA) | |
| The EPA considers that outcome 2.2 of the Rural Lands Strategy would be strengthened by implementing key principles from the Risk-based Framework for Considering Waterway Health Outcomes in Strategic Land-use Planning Decisions (EPA, Office of Environment and Heritage, 2014). The Framework is a protocol that decision-makers, including councils, can use to help manage the impact of land use activities on the health of waterways. | Noted and agreed. Amend draft Rural lands Strategy. The draft Rural Lands Strategy will be amended to include reference to the Risk-based Framework for Considering Waterway Health Outcomes in Strategic Land-use Planning Decisions. |
| The EPA supports the focus of the Rural Lands Strategy on securing the rural edge and protecting rural lands from urban encroachment. The Strategy could be strengthened by expressly considering the need to avoid land use conflict between rural and other land uses. | Noted. No change to draft Rural Lands Strategy. The draft Rural Lands Strategy already includes consideration of land use conflict including Action 12 ‘Review the DCP to ensure that controls adequately manage land use conflict between agricultural enterprise and rural living’. |

| Department of Regional NSW - Mining, Exploration & Geoscience (MEG) - Geological Survey of NSW | |
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| Council's Priority 4.5 of the Rural Lands Strategy acknowledges the importance for planning around identified mineral resources. MEG-GSNSW note several Exploration Licences (ELs) for Group 5 Minerals (including clay/shale and structural clay) overlap the Luddenham and Glenmore Park Urban Investigation Areas. We recommend Council continue to consult with the holders of these ELs as exploration further defines resource areas. | Noted. No change to draft Rural Lands Strategy. Priority 4.5 of the draft Rural Lands Strategy acknowledges the importance for planning around identified mineral resources. The progression of planning for the Luddenham Urban Investigation Area and planning proposal for Glenmore Park Stage 3 would include consultation with relevant stakeholders. |
| NSW Department of Primary Industries - Agriculture | |
| NSW Department of Primary Industries - Agriculture generally supports the recommendations of the draft Strategy and provides advice as follows: | Noted. No change to draft Rural Lands Strategy. |
| NSW DPI Agriculture supports the outcomes and associated actions to use Council's planning framework to protect the rural edge, as defined in the draft Strategy, in the Penrith LEP and ensure that the rural development controls apply to all lands identified by the rural edge. | Noted. No change to draft Rural Lands Strategy. |
| NSW DPI Agriculture supports action 12 of the RLS and notes that buffers can play a key role in mitigating conflict. NSW DPI is reviewing its buffer guidelines, in response to the recommendation in the Agriculture Commissioner's Report and is prepared to assist Council where possible in implementing this recommendation. | Noted. No change to draft Rural Lands Strategy. |
| NSW DPI Agriculture supports Priority 4 of the Strategy and associated actions 12, 13, 14 and 15. | Noted. No change to draft Rural Lands Strategy. |
| Transport for NSW (TfNSW) | |
| TfNSW noted the Draft Rural Lands Strategy has acknowledged the key traffic and transport initiatives, including Outer Sydney Orbital, Western Sydney Freight Line, Metro Greater West and Castlereagh Road upgrade, as per TfNSW comment on the Penrith LSPS. | Noted. No change to draft Rural Lands Strategy. |
| TfNSW suggests that key transport initiatives will support the five priorities outlined in the Draft Rural Lands Strategy, particularly for Priority 4 and 5. | Noted. No change to draft Rural Lands Strategy. |
| TfNSW will continue to work with Council regarding transport solutions that meet safety | Noted. No change to draft Rural Lands Strategy. |

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| and operational needs to achieve the priorities set out in the Draft Rural Lands Strategy. | |
| TfNSW would also welcome the opportunity to work with Council in the place-based plans for the key precincts and provide advice on any transport studies to be undertaken by Council. | Noted. No change to draft Rural Lands Strategy. |
| Community Groups and Land Councils | |
| Friends of Fernhill and Mulgoa Valley (FFMV) | |
| FFMV asks that maps include streets to clarify the boundaries. Clarity is needed too in where the rural lands' boundary is drawn on Park Road Wallacia. | <p>Noted. No change to the draft Rural Lands Strategy.</p> <p>The maps in the draft Strategy do include some street names. At a strategy level, the intention of maps is not to be able to find specific properties.</p> <p>In relation to Park Road, the rural edge boundary uses the boundary of the Western Sydney Aerotropolis as identified in <i>State Environmental Planning Policy (Precincts – Western Parkland City) 2021</i>.</p> |
| There is a grave lack of clearly defined criteria and strategies in place to ensure compliance to conserve the Mulgoa Valley, as evidenced by the proliferation of large sheds, truck parking, containers on site etc without consideration of the effect these will have on the scenic values of the Valley. | <p>Noted. No change to the draft Rural Lands Strategy.</p> <p>The section of the draft Rural Lands Strategy 'Outcome 4.3 Small businesses permitted in rural lands are supported and encouraged' will be reviewed to clarify Council's position on small businesses and truck parking and storage specifically.</p> <p>If there are particular activities that the community become aware of that are not compliant with relevant planning controls, this can be reported to Council's compliance department to investigate.</p> |
| Mulgoa Road is identified as being of high visual sensitivity due to the views provided, but there is nothing on measures to ensure Mulgoa Road remains a scenic rural road. | <p>Noted. No change to the draft Rural Lands Strategy.</p> <p>Mulgoa Road is a State Road and as such, TfNSW manages it. TfNSW has recently undertaken community consultation in relation to upgrades on Mulgoa Road in the vicinity of Fernhill Estate and Mulgoa Village.</p> <p>Irrespective, it is considered appropriate to include some further detail in the Rural Lands Strategy outlining Council's aspirations for Mulgoa Road.</p> |
| There is nothing to indicate that better implementation and compliance with DCP controls will occur to manage many of the current visual detractors seen across the valley. | <p>Noted. No change to the draft Rural Lands Strategy.</p> <p>The benefit of an endorsed Rural Lands Strategy that clearly articulates Council's aspirations for the rural lands is that it paves the way for implementation of actions throughout Council. Once the Rural Lands Strategy is</p> |

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| | endorsed and the actions progressed, implementation and compliance with DCP controls will follow. |
| The submission suggests defining a buffer zone of parkland on the northern side of Chain of Ponds within Glenmore Park Stage 3? The boundaries of Glenmore Park Stage 3 must be clearly identified and stated in the Rural Lands Strategy and future LEP/DCP. | Agreed. No change to draft Local Housing Strategy. Priority 1 Secure the Rural Edge of the Rural Lands Strategy maps the boundary between urban and rural lands. An action is included in the Strategy to map the rural edge in the LEP. This process will require further public exhibition of maps that show the rural edge prior to implementation. |
| Any business development on the Littlefields Precinct of Fernhill next to Mulgoa School should be precluded. | Noted. No change to the draft Rural Lands Strategy. Fernhill Estate is owned by the NSW Government and managed by Greater Sydney Parklands. As such the Rural Lands Strategy does not address future uses for Fernhill Estate. |
| Will the boundaries of Mulgoa and Wallacia villages remain as at present? | The Rural Lands Strategy does not propose to change the boundaries of Mulgoa and Wallacia villages. |
| The boundaries of the village precincts should be clearly delineated to prevent expansion which, if allowed unabated, would have the effect of diminishing the rural village nature of Mulgoa and Wallacia that PCC purports to value. | Further work on the rural villages, including mapping their extents, will be undertaken in the Corridors and Centres Strategy currently under development. |
| At Regentville, the rural edge amends the MRA boundary to exclude the R2 zoned land from the rural lands. Will there be no rezoning of rural land in the Mulgoa Valley to R2? | The Rural Lands Strategy does not seek to rezone rural land for residential purposes. The intention of Priority 1 Secure the Rural Edge is to ensure that rural lands remain so. |
| In SREP No. 13 (Mulgoa Valley Regional Environment Plan), most of the Mulgoa Valley was zoned 'Rural Conservation Landscape'. This was changed to E2 and E3 zoning in Penrith LEP 2010. Will the E2 and E3 zoning continue? No indication of whether E2 and E3 zonings will remain under MRA listing. | The draft Rural Lands Strategy does not propose to rezone land in the Mulgoa Valley. |
| In Outcome 2.2 further intensification of rural residential development in areas not serviced by reticulated sewerage is not generally supported. Does this imply there will be no reduction in size of current lots in the Mulgoa Valley and no additional homes permitted on current lots with 2 houses? | The draft Rural Lands Strategy does not propose amending the minimum lot size for the Mulgoa Valley. |
| In relation to rural land in MRA , a Direction issued by the Minister for Planning to relevant planning authorities under section 9.1(2) of the Environmental Planning and Assessment Act 1979 - previously section 117(2) aims to protect the agricultural production value of rural land | Planning directions are issued by the Minister for Planning. Council is not involved in their development. Irrespective, the draft Rural Lands Strategy is consistent with the direction in that it does not |

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| <p>and a planning proposal must: (a) not rezone land from a rural zone to a residential, business, industrial, village or tourist zone, (b) not contain provisions that will increase the permissible density of land within a rural zone (other than land within an existing town or village). Why is Penrith LGA excluded from the second provision? This would destroy the concept of the Mulgoa Valley as a Metropolitan Rural Area.</p> | <p>seek to increase density within the rural zones (other than rural villages).</p> |
| <p>If the rural land of Mulgoa Valley is to be maintained and protected, why are small business and trucking enterprises being allowed on rural land? Protection of pastureland, as well as bushland, is essential if the Mulgoa Valley is to remain rural.</p> | <p>The draft Rural Lands Strategy seeks to allow a balance of uses within the rural lands of the Penrith LGA as shown by the five priorities identified in the document. Not all priorities will be appropriate on all sites within rural lands and recommended actions for amendments to the LEP and DCP in the draft Rural Lands Strategy will help to manage these competing uses into the future.</p> |
| <p>In Mulgoa Valley decimation of vegetation has been seen on land currently deemed natural resources sensitive e.g., on Chain o’ Ponds Road. How can this be prevented? Are fines adequate? Is there enough compliance monitoring?</p> | <p>The draft Rural Lands Strategy notes that an updated biodiversity study is currently being completed by Council and includes an action to update controls within the LEP and DCP to reflect the outcomes of the study in addition to incorporating buffers within land adjoining natural areas and supporting protection and connection of natural areas. Once the Rural Lands Strategy is endorsed and the actions progressed, implementation and compliance with controls will follow.</p> |
| <p>“To maximise the availability of land suitable for biodiversity offsets, conservation and recovery outcomes in Penrith City will rely almost exclusively on working with rural landowners to secure private conservation agreements”. BUT Biodiversity offsetting opportunities require more than 20 hectares and many farms in Mulgoa Valley are less than 20 ha.</p> | <p>The draft Rural Lands Strategy recognises that biodiversity stewardship agreements require a minimum size of 20 hectares. In acknowledgement that many properties within the Penrith LGA are smaller than this, the draft Rural Lands Strategy includes an action to educate and support landowners to pursue alternative conservation programs through the Biodiversity Conservation Trust, Landcare and Greening Australia.</p> |
| <p>Further intensification of rural residential development in areas not serviced by reticulated sewerage is not generally supported. Fernhill Estate will be connected to sewerage and water, although the Foundation Plan of Management (POM) and draft Landscape Management Plan (LMP) make no mention of the siting of routes for this infrastructure.</p> | <p>Noted. No change to the draft Rural Lands Strategy.</p> <p>Fernhill Estate is owned by the NSW Government and managed by the Greater Sydney Parklands agency.</p> |
| <p>The Fernhill Foundation Plan of Management (POM) recognises that “Fernhill Estate is an exceptional landscape of natural and cultural heritage significance”. Yet the draft Fernhill Landscape Management Plan (LMP) proposes a Wetlands Discovery Area and 2 car parking</p> | <p>Noted. No change to the draft Rural Lands Strategy.</p> <p>Fernhill Estate is owned by the NSW Government and managed by the Greater Sydney Parklands agency.</p> |

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| <p>areas in the cultural rural landscape and with the passing of the Greater Sydney Parklands Bill (2022) Penrith City Council appears to have no authority to stop this desecration.</p> | <p>Council provided a submission to the public exhibition of the Landscape Management Plan for the Greater Sydney Parklands Agency to consider.</p> |
| <p>Protection of heritage conservation areas should apply to rural lands surrounding The Cottage, Fernhill, Fairlight, Glenmore and Glenleigh.</p> | <p>All properties mentioned in this comment are listed as heritage items on the Penrith LEP and managed accordingly. The draft Rural Lands Strategy does not propose to amend this existing framework.</p> |
| <p>The tourist potential of Norton's Basin on the Nepean River should be considered by both the Council and the NSW Government.</p> | <p>Noted. No change to the draft Rural Lands Strategy.</p> <p>Tourism potential will be further considered in the Economic Development Strategy currently being developed.</p> |
| <p>Fig 14 does not adequately show the extent of rural vistas in the Mulgoa Valley which should be protected through the LEP and DCP. Vistas should include:</p> <ul style="list-style-type: none"> • Views over Mulgoa Valley from the forested western hills west of Mulgoa around Fairlight and Mayfair Roads. • Lookouts at The Rock and Riley's Mountain. • Views to the Cottage from Kingshill Road (unchanged since the drawings by Conrad Martens in 1835) and to Fernhill from the corner of Chain of Ponds and Kingshill Roads. • The triangular landscape formed by Fernhill, St Thomas' Church and Cox Cottage • The Mulgoa shale cliff – a unique natural exposure of the Mulgoa laminite member of the Ashfield shale in the Wianamatta Group with a thin bed of Minchinbury sandstone just beneath a capping of Rickabys Creek grave. | <p>Noted. Amend draft Rural Lands Strategy.</p> <p>The additional views listed will be further investigated and included in the Rural Lands Strategy where appropriate.</p> |
| <p>Is the statement in the draft Rural Lands Strategy that Council will identify highly visually sensitive landscapes in the strategic planning framework and provide guidelines for development within their vicinity enough to protect the four landscape elements which contribute to Mulgoa Road being unique - its narrow, two lane nature; its winding up over hills and gullies to follow the natural landform; the fringing of Eucalypts and the views afforded of rural and heritage properties?</p> | <p>Noted. Amend draft Rural Lands Strategy.</p> <p>Mulgoa Road is a State Road and as such, TfNSW manages it. TfNSW has recently undertaken community consultation in relation to upgrades on Mulgoa Road in the vicinity of Fernhill Estate and Mulgoa Village.</p> <p>Irrespective, it is considered appropriate to include some further detail in the Rural Lands Strategy outlining Council's aspirations for Mulgoa Road.</p> |

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| <p>It is essential that Council make clear where certain characteristics have been identified as important to local character such as along Mulgoa Road.</p> <p>A weight limit should be imposed on Mulgoa Road and a speed limit of 50kph in Mulgoa Village extending from Mayfair Road (because of Fernhill entries) to Roscrea.</p> | |
| <p>The Final Fernhill POM proposes for the Littlefields Precinct, adjacent to Mulgoa Road to “Investigate opportunities for small-scale health, community or education uses that meet the emerging needs of the adjacent Mulgoa Village”. Such construction and commercialisation would not provide a positive impression of the Village and would destroy the only view of Fernhill House from Mulgoa Road.</p> | <p>Noted. No change to the draft Rural Lands Strategy.</p> <p>Fernhill Estate is owned by the NSW Government and managed by the Greater Sydney Parklands agency.</p> <p>Council provided a submission to the public exhibition of the Landscape Management Plan for the Greater Sydney Parklands Agency to consider.</p> |
| <p>Grazing land within the Mulgoa Valley should be identified and grazing should continue as a major enterprise.</p> | <p>Noted. Amend draft Rural Lands Strategy.</p> <p>The Penrith Rural Economy and Agribusiness Opportunities Study part 1 which was exhibited as a supporting document to the draft Rural Lands Strategy identifies that extensive agriculture (which would include grazing) exists within Penrith City’s rural lands. While the number of extensive agriculture businesses is relatively low, it was found to cover 12.2% of the land area of Penrith City’s rural lands.</p> <p>The draft Rural Lands Strategy will be amended to refer specifically to the presence of extensive agriculture including grazing.</p> |
| <p>FFMV does not support a blanket “one size fits all” approach to agritourism. A site-based approach is essential.</p> | <p>Noted. No change to the draft Rural Lands Strategy.</p> |
| <p>FFMV supports the concept of agritourism and of short term farm stay accommodation (eg B&B) on properties >10 ha with no additional built structures or within the Villages of Mulgoa and Wallacia.</p> | <p>Noted. No change to the draft Rural Lands Strategy.</p> <p>The draft Rural Lands Strategy discusses visitor accommodation under Outcome 4.2 Rural tourism grows and expands. Many forms of visitor accommodation are already permissible in the rural lands and the draft Rural Lands Strategy does not propose to change this.</p> |
| <p>FFMV does not support farm gate activities in the Mulgoa Valley or temporary or moveable accommodation such as caravans, tents etc.</p> | <p>Noted. No change to the draft Rural Lands Strategy.</p> <p>The draft Rural Lands Strategy notes that there may be opportunities to deliver caravan parks or camping grounds but that these should be considered on a site specific basis.</p> |

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| | <p>The draft Rural Lands Strategy also notes there are opportunities for farm gate experiences where agricultural enterprise exists.</p> |
| <p>FFMV contests that camping is NOT a low-impact activity and camping on farms in peri-urban areas e.g., Metropolitan Rural Area should not be permitted. Likewise farm events should not be hosted on peri-urban farms.</p> | <p>Noted. No change to the draft Rural Lands Strategy.</p> <p>The draft Rural Lands Strategy notes that there may be opportunities to deliver caravan parks or camping grounds but that these should be considered on a site specific basis to ensure potential impacts can be managed.</p> |
| <p>FFMV questions what is meant by “way finding”? Presumably by electronic means, not we hope, a further proliferation of signs!</p> | <p>Noted. No change to the draft Rural Lands Strategy.</p> <p>The draft Rural Lands Strategy refers to a wayfinding strategy that is currently in preparation by Council. The intention of the wayfinding strategy is to guide the provision of signage and ensure it is consistent across the LGA.</p> |
| <p>There is a contradiction in the aims expressed in this section 4. On the one hand PCC wants to protect agricultural land, scenic values and biodiversity and on the other support small businesses such as trucking, light industry and service companies.</p> | <p>Noted. No change to the draft Rural Lands Strategy.</p> <p>The draft Rural Lands Strategy seeks to allow a balance of uses within the rural lands of the Penrith LGA as shown by the five priorities identified in the document. Not all priorities will be appropriate on all sites within rural lands and recommended actions for amendments to the LEP and DCP in the draft Rural Lands Strategy will help to manage these competing uses into the future.</p> |
| <p>While the sense of appreciation towards the historical and cultural values of rural cultural landscapes is increasing, there is a grave lack of criteria and strategies in place to conserve the Mulgoa Valley, as evidenced by the proliferation of large sheds, truck parking, containers on site etc. without consideration of the effect these will have on the scenic values of the Valley.</p> | <p>Noted. No change to the draft Rural Lands Strategy.</p> <p>The draft Rural Lands Strategy includes actions for amendments to the LEP and DCP to further articulate the values of the rural lands generally and the Mulgoa Valley specifically in the hope that these amendments will help manage competing uses into the future.</p> |
| <p>PCC LEP 2010 allowed truck parking areas (in Zones RU1, RU2, RU4, E3 and E4) for a maximum of 2 trucks per property and associated plant transported by the trucks but did not allow the construction of a shed or earthworks to create the parking area. So why have these been allowed in the Mulgoa Valley?</p> <p>Mulgoa Valley should not be the site for small or large operators to house their trucks, equipment etc.</p> <p>FFMV objects to the recent approval of the large shed on Littlefields Road, opposite Gow Park,</p> | <p>Noted. No change to the draft Rural Lands Strategy.</p> <p>Truck parking areas may only be undertaken in RU1, RU2, RU4, E3 and E4 zones as exempt development, which allows for a maximum of 2 trucks per property but does not include the construction of a shed or earthworks to create the parking area. This however does not mean that a separate development application could not be considered for such. Farm buildings are typically permitted in the rural zones, which includes structures that are ancillary to an agricultural use of the land such as a machinery</p> |

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| <p>within the visual gateway of Mulgoa Village from the east.</p> <p>FFMV expresses the need for better implementation and compliance with DCP controls to manage many of the current visual detractors seen across the valley. It also emphasises that there must be strict oversight of 'industrial creep' when the DCP is reviewed.</p> | <p>shed. This is consistent with the intent of the Strategy to support our rural economy.</p> <p>Further, an action of the draft Strategy is to prepare site specific DCP guidelines for truck parking and storage in the rural areas. The approach is in direct response to earlier community feedback and concerns about amenity etc.</p> |
| <p>FFMV supports priority 5 provided there is no reduction in rural land.</p> | <p>Noted. No change to the draft Rural Lands Strategy.</p> <p>The draft Rural Lands Strategy is clear that additional housing will only be supported in the rural villages. As such, there will be no reduction in rural land.</p> |
| <p>The implementation plan should include residents as a group under the 'collaborate' role.</p> | <p>Noted. Amend draft Rural Lands Strategy.</p> <p>The Rural Lands Strategy will be amended to include reference to the community as one of the key groups that Council will collaborate with to implement the Strategy. This approach is consistent with the IAP2 spectrum for stakeholder participation in decision making.</p> |
| <p>DCP provisions should be better enforced including:</p> <p>The practice of permitting DA non-compliant items based on precedence should cease.</p> <p>Signage restrictions must be enforced</p> <p>PCC's compliance team should undertake regular audits/inspections of Mulgoa Valley rural properties to ensure illegal industrial uses are removed and do not proliferate.</p> | <p>Noted. No change to draft Rural Lands Strategy.</p> <p>Implementation of and compliance with DCP provisions are managed by Council's Development Services and Environmental Health and Compliance departments.</p> |
| <p>Design guidelines should be strengthened for development within the Mulgoa Valley:</p> <ul style="list-style-type: none"> o Site-based planning to ensure siting, bulk and scale of buildings is appropriate o Ensure design principles are followed to limit light pollution. o In bushfire prone peri-urban rural areas such as Mulgoa Valley, dwellings should have a greater level of fire safety. Guidance and methodologies in relation to bushfire attack for siting and landscaping, planning and design, and the issues of active defence and emergency shelter, should be part of the LEP and DCP. o A 'user guide' to assist in explaining the DCP requirements be made available to all residents eg via rates notices and when a DA is lodged. o "Discourage new activities, development, works or land management that would dominate | <p>Noted. No change to draft Rural Lands Strategy.</p> <p>The draft Rural Lands Strategy includes a number of actions to amend controls in the LEP and DCP for Penrith City's rural lands as a whole. There are already specific requirements in both the LEP and DCP that relate specifically to development in the Mulgoa Valley.</p> <p>Furthermore, Council's Development Services team are available to provide pre-lodgement advice to anyone seeking to lodge a development application.</p> |

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| or significantly alter the existing scenic or environmental qualities of Penrith City's primary rural backdrops" (Landscape Character Strategy 2006) | |
| Improve community awareness of compliance actions and penalties. Increase support for the Compliance team at Penrith Council. | Noted. No change to the draft Rural Lands Strategy. Improving community awareness of compliance actions and penalties is not the role of the Rural Lands Strategy. |
| No recreational trail bike riding in rural areas. | Noted. No change to the draft Rural Lands Strategy. |
| Conserve heritage authenticity for future generations. | Noted. No change to the draft Rural Lands Strategy. The draft Rural Lands Strategy includes an action to work with Aboriginal and Torres Strait Islander stakeholders to identify and protect significant Aboriginal cultural heritage landscapes in the rural lands. This is in addition to the heritage items and conservation areas already identified in Penrith LEP. |
| Any upgrading of historic Mulgoa and St Thomas roads to improve road safety should respect the heritage and scenic values of those roads. | Noted. Amend draft Rural lands Strategy. Mulgoa Road is a State Road and as such, TfNSW manages it. TfNSW has recently undertaken community consultation in relation to upgrades to Mulgoa Road in the vicinity of Fernhill Estate and Mulgoa Village. Irrespective, it is considered appropriate to include some further detail in the Rural Lands Strategy outlining Council's aspirations for Mulgoa Road. Mulgoa Road's former alignment, St Thomas Road is listed as a heritage item on the Penrith LEP ensuring that these values are considered in any future works. |
| Wallacia Progress Association | |
| WPA commends Council for taking its feedback from the LSPS Submission from 2019 and asks Council to review this document again. WPA commends Council for promoting place-based planning to maintain or enhance the values of the MRA. | Noted. No change to the draft Rural Lands Strategy. |
| WPA requests clarification of the Rural South West Precinct boundary along Park Road from the Aerotropolis (figure 6 pages 25). It appears the Aerotropolis is encroaching on the entrance of Park Roads and sensitive visual gateways. | The rural edge boundary in the location of Park Road uses the boundary of the Western Sydney Aerotropolis as identified in <i>State Environmental Planning Policy (Precincts – Western Parkland City) 2021</i> . |

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| WPA requests for Jerrys Creek to be added to map 4.1 Water in the Penrith Rural Lands and Villages Study as well as future water course mapping as it is a major creek that gets flooded from time to time. | Noted. No change to draft Rural Lands Strategy. The Penrith Rural Lands and Villages Study is a supporting technical document to the Rural Lands Strategy. Jerrys Creek is included on relevant maps in the draft Rural Lands Strategy. No change to the Study. |
| WPA requested a bird study to be completed in Wallacia when they submitted their LSPS submission in 2019. | Noted. No change to the draft Rural Lands Strategy. The draft Rural Lands Strategy identifies that a biodiversity study is currently being finalised by Council. This includes consideration of both flora and fauna. |
| WPA requests the Mulgoa Valley to be extended to the boundary of the M9 (OSO- Outer Sydney Orbital) on Park Road. This will protect rural spaces and entrance into the Wallacia Village. | Noted. No change to the draft Rural Lands Strategy. The draft Rural Lands Strategy has gone into detail in determining a rural edge boundary and includes an action for the rural edge to be mapped in the LEP. It is not considered necessary to also extend the boundary of the Mulgoa Valley. |
| Park Road is to be recognised as having highly visual sensitive landscapes and heritage and cultural landscapes. | Noted. No change to the draft Rural Lands Strategy. Much of the length of Park Road is included in the Mulgoa Valley scenic and cultural landscape in the draft Rural Lands Strategy. |
| Future green grid connections should be investigated in Wallacia as beautiful Nepean River is Penrith's most important natural asset and historically it has sporting, recreation, environmental, agricultural and Aboriginal significance. | Noted. No change to the draft Rural Lands Strategy. The Green Grid Strategy was endorsed by Council in October 2021. The Green Grid Strategy does identify a number of connections in and around Wallacia including the Nepean River. |
| Facilitate delivery of the Sydney Green Grid's 'Mulgoa Creek and Warragamba Pipeline Open Space Corridor' opportunities, considering potential opportunities for a new shared path linking the Mulgoa and Wallacia villages to recreational uses via the Warragamba Pipeline Open Space Corridor. | Noted. No change to the draft Rural Lands Strategy. This comment relates to the Green Grid Strategy which was endorsed by Council in October 2021. The Green Grid Strategy outlines the priority for delivery of this connection in the context of the green grid for the whole Penrith LGA. |
| The Western District Plan emphasises increasing urban tree canopy and delivering green grid connections is now a planning priority. Scenic view corridors would increase tourism of the LGA. | Noted. No change to the draft Rural Lands Strategy. The endorsed Green Grid Strategy builds on the concepts of the Western City District Plan for Penrith City. The draft Rural Lands Strategy recognises and seeks to preserve the scenic values of Penrith |

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| | City's rural lands and support the expansion of tourism in the rural lands. |
| WPA concurs with the PSCLS that Wallacia has a landscape identified as having a significance of regional or higher level. They would like to see conservation, maintenance and improvements to landscape characteristic and protection of important vistas, landmarks and view corridors. | Noted. No change to the draft Rural Lands Strategy. The draft Rural Lands Strategy includes actions to incorporate scenic and cultural landscapes, highly visually sensitive landscapes, rural vistas and visual gateways in either the LEP and DCP to ensure they are considered and preserved. |
| Park Road, Wallacia Agriculture and Farming Land needs to be identified and protected. Park Road Agricultural usage should be controlled by council to be compatible with biodiversity and scenic conservation outcomes. New development of large sheds should be regulated by council's DCP with size, colour controls and the effect that current scenic views should be considered to protect current scenic landscape values. Council's compliance team is required to stop Inappropriate dumping /storage of Shipping containers, trailers, and equipment on Park Road. | Noted. No change to the draft Rural Lands Strategy. The draft Rural Lands Strategy includes a number of actions to incorporate the findings of the Strategy relating to scenic and cultural landscapes, highly visually sensitive landscapes and rural vistas. |
| WPA commends Council's initiative to build relationships and network with agricultural businesses owners to share experiences and encourage innovation on the rural lands with large minimum lot size controls regulated through DCP to enable the expansion of agricultural enterprises while protecting the amenity of rural living. There is a need to have restrictions and controls on storage and size of large earth moving equipment or other equipment or machinery and trucks that are not necessary for the farming usage i.e. no truck businesses or earthmoving shops or shop fronts, no storage areas allowed for large equipment or trucks if not in use for farming usage on the agricultural land they are standing on. | The section of the draft Rural Lands Strategy 'Outcome 4.3 Small businesses permitted in rural lands are supported and encouraged' will be reviewed to clarify Council's position on small businesses and truck parking and storage specifically. |
| All agricultural and rural lands in Wallacia need identification, protection and enhancement. Environmental values of rural lands in Wallacia need retention of the scenic corridor within this strategy. | Noted. No change to the draft Rural Lands Strategy. The draft Rural Lands Strategy includes a number of actions to incorporate the findings of the Strategy relating to scenic and cultural landscapes, highly visually sensitive landscapes and rural vistas. |
| Berkshire Park and Llandilo Community Group | |
| The Group do not agree with preserving the RU4 zoned small rural lands in Berkshire Park and Llandilo, arguing that these are not suitable for farming and are no longer financially viable. | Noted. No change to draft Rural Lands Strategy. The draft Rural Lands Strategy considered the evidence available and concluded that further subdivision or urban development will not be |

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| <p>The Group seek to have these areas rezoned for housing.</p> | <p>supported in the rural lands, including Berkshire Park and Llandilo, due to:</p> <ul style="list-style-type: none"> • Need to maintain existing agricultural activities operating and reduce land use conflicts; • Lack of access to reticulated sewer; • Flooding impacts and limited evacuation capacity; • Significant areas of environmental significance; and • The draft Local Housing Strategy finding that there is enough capacity to deliver necessary housing for the projected population in the existing urban areas and identified urban release areas. |
| <p>The Group argue that:</p> <ul style="list-style-type: none"> • New housing estates have trees and gardens when planned and built well. • The Sydney Metropolitan Strategy 2007 designated Penrith as the ‘City Centre’ for Western Sydney. The Penrith City Vision also supports designation as a ‘Global City’. • The area is adjacent to the development of Marsden Park. Berkshire Park and Llandilo are the natural next housing estate. • The area is surrounded by new urban subdivisions, e.g. Cranebrook, Jordan Springs etc. • Penrith City is one of the slowest growing LGAs in Western Sydney. The area has potential to supply a 30,000-50,000 homes. • Housing in the area would connect and provide integration with Hawkesbury LGA, Richmond and Windsor. • Much of the area is not used for agricultural purposes. Many properties are small and the soil is unsuitable. The properties are not financially viable for agri-businesses and the agricultural industry is increasingly volatile. • Many RU4 zone rural lots within the area do not comply with Council's current | <p>Noted. No change to draft Rural Lands Strategy.</p> <p>The draft Rural Lands Strategy considered the evidence available and concluded that further subdivision or urban development will not be supported in the rural lands, including Berkshire Park and Llandilo, due to:</p> <ul style="list-style-type: none"> • Need to maintain existing agricultural activities operating and reduce land use conflicts; • Lack of access to reticulated sewer; • Flooding impacts and limited evacuation capacity; • Significant areas of environmental significance; and <p>The draft Local Housing Strategy finding that there is enough capacity to deliver necessary housing for the projected population in the existing urban areas and identified urban release areas.</p> |

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| <p>LEP minimum lot size of 2 hectares for RU4 zoning.</p> <ul style="list-style-type: none"> • A proportion of the area is not flood affected. • Water supply (for farming) is limited. • Council rates are costly and will be soon unaffordable. • The demand for housing is high. • The area is highly accessible to transport and surrounding centres, universities etc. • Properties could be readily serviced by sewerage and water. • Churches, retirement villages, correctional facilities and non-agri businesses are locating to the area. • Roads within the area are under pressure, and resulting in long delays. The proposed M9 Motorway and Castlereagh Connection will pass through the area. • Residential development will support investment in local infrastructure, esp. schools, roads, flood evacuation, services. | |
| <p>The Group question why their area is being restricted to grow. The Group argues that it is being discriminated against compared to the rest of the Sydney Metropolitan Area and NSW.</p> <p>They also question why do they have so many restrictions, e.g. being unable to farm or build houses? They question what other areas in NSW are being similarly restricted?</p> | <p>Noted. No change to the draft Rural Lands Strategy.</p> <p>In addition to the reasons outlined above, the Sydney Region Plan and Western City District Plan both identify the Berkshire Park and Llandilo areas as part of the MRA and highlight the need to maintain the economic, environmental and social values of the rural lands. The rural edge identified in the draft Rural Lands Strategy reflects the MRA.</p> |
| Mulgoa Valley Landcare Group | |
| <p>Mulgoa Valley Landcare Group commend Penrith Council for their recognition of the important values protected by the rural lands and the commitment to their protection through zonings, policy and planning measures and provides comments as follows:</p> | <p>Noted.</p> |
| <p>Mulgoa Valley Landcare Group is supportive of the defined rural edge for the Mulgoa Valley (Rural South West Character Area) which will</p> | <p>Noted.</p> |

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| reduce development/rezoning speculation and subsequent community conflict. | |
| Mulgoa Valley Landcare Group also encourages a transition or buffer zone of large lots (minimum one hectare) or alternatively an 80m wide planted buffer along Chain-o-Ponds Rd (Northern side) to manage the urban/rural interface where Glenmore Park Stage 3 will meet the rural landscapes. | <p>Noted. No change to the draft Rural Lands Strategy.</p> <p>This issue will be managed through the progression of the Glenmore Park Stage 3 planning proposal which is understood to propose a buffer of larger lots along its interface with the rural lands.</p> |
| The submission acknowledges the significance of the Blaxland Creek corridor which is located within the South East Transition Character Area. It also asks that, as a priority and in all aspects of planning, that the riparian corridor of Blaxland Creek be generously protected (i.e., well beyond the standard 20m strip of riparian zone protection) along with a buffer zone which will support movement of macropods. | <p>Noted. No change to the draft Rural Lands Strategy.</p> <p>The draft Rural Lands Strategy includes an action to review and update planning controls within the LEP and DCP to protect and restore waterways and riparian corridors.</p> |
| MVLG is concerned about the Deerubbin structure plan which will impact the Rural North West Character Area. The Deerubbin proposal is incongruous with rural land use. This will be the single largest approval given to clear native vegetation communities in Sydney history – and this has already been supported by the NSW Government and Penrith Council who are now complicit in seeking Biocertification for the Deerubbin lands (ie the ‘turning off’ of all legislation that protects endangered bushland) to achieve these development aspirations. Surely Penrith Council can no longer consider the ‘rural north west’ to retain any semblance of a rural landscape or rural character given the NSW governments support for the Deerubbin Structure Plan. | <p>Noted. Amend draft Rural Lands Strategy.</p> <p>The Deerubbin Local Aboriginal Land Council (DLALC) has entered into an agreement with NSW Government under the Cumberland Plain Conservation Plan. This includes developing a Structure Plan for the DLALC land. As part of this agreement, the NSW Government and the DLALC have started a joint project to support the fast-tracking of biodiversity approvals for DLALC’s Penrith Structure Plan through a modification to the Plan.</p> <p>Council is not a party to the agreement.</p> <p>The draft Rural Lands Strategy will be amended to provide clarity around the agreement between DLALC and NSW Government and confirmation that future uses on DLALC land will be subject to the assessment of the Penrith Structure Plan by the NSW Government. The outcome of this process will enable Council to respond to the structure plan in future.</p> |
| The vegetation proposed to be conserved by Deerubbin includes areas of active sand mines. These can never be considered as a biodiversity offset as they won’t support endemic ecological communities. Under the Deerubbin proposal the poorest quality bushland has been earmarked for conservation whilst the most diverse and high-quality bushland areas have been flagged for development. | <p>Noted. Amend draft Rural Lands Strategy.</p> <p>The draft Rural Lands Strategy will be amended to provide clarity around the agreement between DLALC and NSW Government and confirmation that future uses on Deerubbin LALC land will be subject to the assessment of the Penrith Structure Plan by the NSW Government. The outcome of this process will enable Council to respond to the structure plan in future.</p> |
| The Deerubbin structure plan will negate any efforts by Council to retain rural character in this | Noted. Amend draft Rural Lands Strategy. |

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| <p>character area and the destruction of landscape connectivity and biodiversity corridors as a result will have a massive impact on biodiversity within the Penrith LGA.</p> | <p>The draft Rural Lands Strategy will be amended to provide clarity around the agreement between DLALC and NSW Government and confirmation that future uses on DLALC land will be subject to the assessment of the Penrith Structure Plan by the NSW Government. The outcome of this process will enable Council to respond to the structure plan in future.</p> |
| <p>Who is advocating on behalf of the destruction of 1000ha of CEEC bushland if “Penrith Council will work with both the NSW Government and DLALC to support the progression of this agreement”?</p> | <p>Amend draft Rural Lands Strategy. The draft Rural Lands Strategy will be amended to provide clarity around the agreement between DLALC and NSW Government and confirmation that future uses on DLALC land will be subject to the assessment of the Penrith Structure Plan by the NSW Government. The outcome of this process will enable Council to respond to the structure plan in future.</p> |
| <p>The South East Transition Area has been lost to the aerotropolis, the Rural North West will be lost to the Deerubbin Structure Plan (and presumably, over time, this will also impact the future of the Rural North East Precinct with their trucking and logistics businesses). The only genuine MRA which might be retained into the future will be the Mulgoa Valley</p> | <p>Noted. No change to the draft Rural Lands Strategy.</p> |
| <p>The MVLG concurs with Council’s statement that “the clearing and fragmentation of our native vegetation has occurred to such a degree that national biodiversity conservation targets cannot be achieved without deliberate conservation and recovery measures”. The four new growth areas (including the Greater Penrith to Eastern Creek Growth area’) will amount to a further 40,000 hectares of development on the Cumberland Plain. With a TOTAL area of only 200,0000 hectares and no approved plan to ‘maintain or improve’ our critically endangered ecological communities– we can expect that our native vegetation communities will be extinct in as a little as a decade.</p> | <p>Noted. No change to draft Rural Lands Strategy.</p> |
| <p>The draft rural lands strategy fails to acknowledge that Orchard Hills Defence Establishment ‘major offset’ for the Western Sydney Airport is the most abhorrent example of biodiversity offsets ‘double dipping’ in the history of the scheme. It is devastating that Penrith Council gives kudos to an arrangement that had already seen biodiversity conservation promised at this location in 2007 in a bipartisan pledge to “protect and manage ALL of the 1370 hectares of conservation lands” at the Defence Establishment Orchard Hills. The federal government then ‘regifted’ the site over a</p> | <p>Noted. No change to the draft Rural Lands Strategy. It is not the role of the draft Rural Lands Strategy to comment on the appropriateness of the biodiversity offset for Western Sydney Airport.</p> |

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| <p>decade later when they announced that it would become the major offset for the airport. Why does Penrith Council support such a routing of the offset system within their own LGA?</p> | |
| <p>The Cumberland Plain Conservation Plan remains in draft and without any funding allocation from NSW treasury. It is a myth that native vegetation can sustain itself through the process of Biodiversity Offsetting (ie the clearing of one patch of CEEC bushland will fund the protection of another). This cannot occur because, as communicated to our decision makers at the time of the implementation of this legislation – there is a 50% net loss – a HALVING of what was left at the moment the legislation was approved in 2016.</p> | <p>Noted. No change to the draft Rural Lands Strategy.</p> <p>The biodiversity offset program and the Cumberland Plain Conservation Plan are both projects/programs of the NSW Government, as such the draft Rural Lands Strategy cannot change these.</p> <p>The draft Rural Lands Strategy seeks to prioritise protection of ecological health and biodiversity to the extent that it is within Council's remit.</p> |
| <p>With financial incentives now absent from offsets schemes – how does Council propose to 'secure private conservation agreements'. Like the NSW Government – does the Penrith Council expect to get something for nothing? Does Council expect landowners to conserve their land for no reward? Council needs to re-evaluate how this will occur. Land for Wildlife is a nice program for existing landowners and they can apply for a program maximum of \$6000 (\$2000 for three years) however, the moment that property is sold to new owners the biodiversity values can simply be destroyed – with no consequences. How will Council incentivise biodiversity conservation on private land? What type of agreements will be secured?</p> | <p>Noted. No change to the draft Rural Lands Strategy.</p> <p>As indicated by action 5 in the draft Rural Lands Strategy, Council seeks to 'Engage with, educate and support rural landowners to:</p> <ul style="list-style-type: none"> • Access conservation programs and initiatives through partners including the Biodiversity Conservation Trust, Landcare and Greening Australia; and • Increase involvement in volunteering and citizen science opportunities.' |
| <p><i>"Opportunities exist for landowners to further explore conservation initiatives on their land with the NSW Government's Biodiversity Conservation Trust, Landcare, Greening Australia and other non-government organisations. Council will work to educate and support rural landowners in relation to these organisations, the opportunities they offer and how it could benefit their property and the LGA as a whole." Page 40</i></p> <p>From the above statement it appears that Penrith Council is simply redirecting the issue of conservation on private land to another agency. How is it then that this appears as an 'action' when all Council is doing is re-directing the traffic?</p> | <p>Noted. No change to the draft Rural Lands Strategy.</p> <p>As indicated by action 5 in the draft Rural Lands Strategy, Council seeks to 'Engage with, educate and support rural landowners to:</p> <ul style="list-style-type: none"> • Access conservation programs and initiatives through partners including the Biodiversity Conservation Trust, Landcare and Greening Australia; and • Increase involvement in volunteering and citizen science opportunities.' |
| <p>MVLG has on many occasions over the past two decades recommended a program of Council rates relief to incentivise biodiversity conservation. Yet again we implore Council to consider at minimum a 'pilot program' of rates relief for say 10 properties within Penrith Rural Lands for three years (and presumably not those lands which will be detrimentally affected</p> | <p>Noted. No change to the draft Rural Lands Strategy.</p> <p>While there may be merit in the program proposed, Council would need to carefully consider the implications of administration and implementation of such a program before proceeding.</p> |

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| <p>by proximity to the Deerubbin Structure Plan’s warehousing and urban footprint). Rates relief could be proportionate to the amount of land conserved and would require annual assessment and the establishing of a simple plan for each year of participation.</p> | |
| <p>MVLG draws Council’s attention to the eastern gateway to Mulgoa Village in an area ‘protected’ by a ‘scenic landscape’ overlay – and the recent approval and construction of a truck and excavator shed (262 Littlefields Rd) of epic proportions on a 3-acre property. This approval is in contrast with the statement in page 47 of the strategy “<i>Development within these visual gateways will be carefully managed to provide a safe, welcoming and positive experience that is definitely rural</i>”.</p> | <p>Noted. No change to the draft Rural Lands Strategy.</p> <p>Farm buildings are typically permitted in the rural zones, which includes structures that are ancillary to an agricultural use of the land such as a machinery shed. This is consistent with the intent of the Strategy to support our rural economy.</p> <p>Further, an action of the draft Strategy is to prepare site specific DCP guidelines for truck parking and storage in the rural areas. The approach is in direct response to earlier community feedback and concerns about amenity etc.</p> |
| <p>MVLG claims that many important vistas within the Mulgoa Valley have been overlooked by the strategy and suggests a tour of the valley to experience the many important vistas within the South West Character Area.</p> | <p>Noted. No change to the draft Rural Lands Strategy.</p> |
| <p>Penrith council can’t have it both ways and it seems Council is trying to keep everyone happy by, on the one hand acknowledging the importance of RURAL landscapes, then on the other hand offering up the possibility of more trucks and home industries. We know that the flood gates will open once Council approves more trucking operators and excavation businesses to use our rural lands as industrial land.</p> | <p>Noted. No change to the draft Rural Lands Strategy.</p> <p>The draft Rural Lands Strategy seeks to strike a balance between many, potentially competing, land uses in Penrith City’s rural lands. The draft Strategy includes a number of actions to review and update planning controls in both the LEP and DCP to help manage future development and help meet all five identified priorities in the Strategy.</p> |
| <p>The community of Mulgoa Valley who have spent years defending the scenic qualities of this area have been bullied, intimidated and vilified for daring to speak out against inappropriate and unsympathetic development and land uses. The community conflict is at crisis point – and this could easily be diffused if Council took on the responsibility of monitoring for inappropriate land uses or illegal clearing and dumping. We can no longer speak out against activities of ‘neighbours’ without genuine fear of ongoing reprisals.</p> | <p>Noted. No change to the draft Rural Lands Strategy.</p> <p>These functions are undertaken by other areas of Council, such as the compliance team or the Environmental Protection Agency through the Regional Illegal Dumping (RID) squads.</p> |
| <p>We vigorously object to camping and caravans in the Mulgoa Valley and a plethora of cabins and villas in the name of ‘tourism’ are also entirely unacceptable. Penrith Council failed to adequately translate the SREPP 13 into the LEP</p> | <p>Noted. No change to draft Rural Lands Strategy.</p> <p>The draft Rural Land Strategy does not seek to change the existing permissibility for camping,</p> |

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| <p>2010 exposing the Mulgoa Valley and Wallacia to multiple attempts for the development of super-cemeteries. We ask that Council takes this opportunity to exclude such development so that yet again, community do not have to mount tiresome and extended campaigns to protect against development that should never have been considered.</p> | <p>caravans, tourist accommodation and cemeteries.</p> |
| <p>Finally, and as we have been stating for what seems like eternity, the Mulgoa Valley DCP is the ONLY document which makes any effort to protect the valley against unsympathetic development and inappropriate land use. Yet, the DCP is simply a guide and will not withstand a legal challenge. What will Council do to protect the unique cultural, rural and scenic landscapes of the Mulgoa Valley? Community representatives who have defended these values over the past number of decades are fatigued – and we seek support of all levels of government so we can feel secure that the future of our valley will be protected in our absence. Sadly, robust protections are seemingly impossible to achieve and we must stand by and observe the death by a thousand cuts. Perhaps Council would like to support the nomination of Mulgoa Valley as a Cultural Landscape as nominated by the Friends of Fernhill and Mulgoa Valley?</p> | <p>Noted. No change to draft Rural Lands Strategy. Council is seeking to provide clear guidance for all Penrith City’s rural lands by completing a Rural Lands Strategy. The Mulgoa Valley, being mapped in the LEP and having a specific section in the DCP, has the greatest level of protection of all Penrith City’s rural lands. Council is limited to using the planning tools that are part of the NSW planning framework. It is the NSW Government’s legislation that stipulates DCPs are guides.</p> |
| <p>Industry Groups and Other Organisations</p> | |
| <p>Urban Development Institute of Australia (UDIA)</p> | |
| <p>UDIA urges Council to investigate the Northern Road Corridor to provide for sustained greenfield housing supply beyond 2030.</p> | <p>Noted. No change to draft Rural Lands Strategy. The draft Rural Lands Strategy proposes a rural edge boundary that excludes additional urban development outside of Glenmore Park Stage 3 and the Western Sydney Aerotropolis. Further detail in relation to the provision of housing supply beyond 2030 can be found in the draft Local Housing Strategy.</p> |
| <p>Design Collaborative Pty Ltd on behalf of the Deerubbin Local Aboriginal Land Council (LALC)</p> | |
| <p>Deerubbin LALC supports the five priorities for the rural lands set out in the Draft Strategy. In particular, it supports actions and initiatives related to priorities 2,3,4 and 5 identified for the Rural North West and Rural North East place frameworks within which its lands are located.</p> | <p>Noted. No change to draft Rural Lands Strategy.</p> |
| <p>Some of Deerubbin LALC’s proposals in its Penrith Structure Plan have direct links to these priorities. These include a significant biodiversity conservation component (1,100 Ha), an</p> | <p>Noted. No change to draft Rural Lands Strategy.</p> |

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| agribusiness precinct (396 Ha), cemetery (151 Ha) and residential development. | |
| Deerubbin LALC's Penrith Structure Plan has direct links to Priority 2 as it forms the basis for an amendment to the Cumberland Plain Conservation Plan consistent with the place framework for the Rural North West and East precincts. | Noted. No change to draft Rural Lands Strategy. |
| Deerubbin LALC's proposals are consistent with Council's Outcome 2.3 and it welcomes Council's support and assistance to progress the agreement as set out in the Draft Strategy. | Noted. No change to draft Rural Lands Strategy. |
| Deerubbin LALC requests that Council takes its Penrith Structure Plan into account in the preparation of any new planning controls for the rural lands as foreshadowed in the actions in Outcome 2.1. | Noted. No change to draft Rural Lands Strategy. The Penrith Structure Plan is still subject to assessment. In the first instance this will be undertaken by the NSW Government through its agreement with DLALC. The outcome of this process will enable Council to respond to the structure plan in future. |
| Deerubbin LALC supports the action in relation to outcome 3.1 | Noted. No change to draft Rural Lands Strategy. |
| Deerubbin LALC supports actions and initiatives which seek to facilitate agricultural activities and maintain zonings and DCP controls as set out in Outcome 4.1 as well as actions which facilitate alternative agricultural production (such as 'controlled environment' production) as noted in the Rural North West place framework. | Noted. No change to draft Rural Lands Strategy. |
| Deerubbin LALC is open to a range of suitable and appropriate economic development and business opportunities on its lands in line with its Community Land and Business Plan. This would include opportunities for tourism-related or culture-based development in line with Outcome 4.2 or small or home-based businesses in line with Outcome 4.3. | Noted. No change to draft Rural Lands Strategy. Future uses on DLALC land will be subject to the assessment of the Penrith Structure Plan by the NSW government. The outcome of this process will enable Council to respond to the structure plan in future. |
| Deerubbin LALC also supports the proposals contained the Draft Strategy for actions outside the planning framework including the establishment of an agriculture, food and innovation network to foster agricultural enterprises in the LGA and establishment of networks to connect tourist businesses. Deerubbin LALC would seek to be involved in and would be an important participant in any such networks to identify and establish new agricultural enterprises and to build capacity within its community. | Noted. No change to draft Rural Lands Strategy. |
| Outcome 5.2: Deerubbin LALC's landholdings are outside the identified village areas. Nevertheless, the Penrith Structure Plan | Noted. No change draft Rural Lands Strategy. |

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| <p>identifies some of its landholdings for residential development, generally being those parcels surrounded by existing developed land.</p> | <p>The Penrith Structure Plan is still subject to assessment. In the first instance this will be undertaken by the NSW Government through its agreement with DLALC. The outcome of this process will enable Council to respond to the structure plan in future.</p> |
| <p>Deerubbin LALC supports Outcome 5.3 – rural lands for infrastructure are identified as this directly relates to its priority cemetery and funeral project identified in the Penrith Structure Plan and Community Land and Business Plan.</p> | <p>Noted. No change draft Rural Lands Strategy.</p> <p>The Penrith Structure Plan is still subject to assessment. In the first instance this will be undertaken by the NSW Government through its agreement with DLALC. The outcome of this process will enable Council to respond to the structure plan in future.</p> |
| <p>Deerubbin LALC supports Council’s continued advocacy for the delivery of the Castlereagh Connection which will provide improved road access to northern Penrith and beyond as part of an enhanced regional road network and which is recognised as a critical component to support the Rural North West and Rural North East place frameworks</p> | <p>Noted. No change to draft Rural Lands Strategy.</p> |
| <p>Deerubbin LALC acknowledges and supports Council’s actions identified in the Rural North West place framework to:</p> <ul style="list-style-type: none"> - work with Department of Planning and Environment and Deerubbin Local Aboriginal Land Council to progress the amendment to the Cumberland Plain Conservation Plan for the deferred lands; and - continue to advocate for the delivery of the Castlereagh Connection for flood evacuation and other benefits. | <p>Noted. No change to draft Rural Lands Strategy.</p> |
| <p>Private Individuals and Landowners</p> | |
| <p>Submission A</p> | |
| <p>The submission relates to a 250ha area comprised of 21 landholdings in Luddenham that is close to the planned M9 Motorway and M9/M12 Motorway. The site is located immediately to the north of the Agribusiness Precinct and west of the Northern Gateway Precinct.</p> | <p>Noted. No change to the draft Rural Lands Strategy.</p> |
| <p>The identification of the site in the draft Rural Lands Strategy as part of a ‘highly visually sensitive landscape’ and The Northern Road Regional View Corridor Scenic and Cultural Landscape is not considered to be an appropriate reflection of the site’s future potential to support a variety of land uses including employment generating activity that is</p> | <p>Noted. No change to the draft Rural Lands Strategy.</p> <p>The intention of identifying scenic and cultural landscapes and highly visually sensitive landscapes in the draft Rural Lands Strategy was to reflect the existing situation rather than any future potential.</p> |

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| <p>complementary to the Aerotropolis, particularly given its location.</p> | <p>The site lies within the MRA as identified by the Sydney Region Plan and Western City District Plan.</p> <p>While it is acknowledged that this site lies adjacent to parts of the Aerotropolis, the amount of employment land rezoned in the Aerotropolis will fulfil supply requirements for many years to come. This finding is reflected in Council's Employment Lands Strategy which was endorsed in October 2021.</p> <p>In addition, the draft Local Housing Strategy which was exhibited alongside the draft Rural Lands Strategy, has found that there is enough capacity to deliver housing for the projected population in existing urban areas and urban investigation areas.</p> |
| <p>There is an opportunity to explore this area as a transition zone that would see lands uses complementary to the Aerotropolis closer to The Northern Road, while uses such as agriculture and agribusiness transition to the west, with the potential for residential uses at the site's most western extent.</p> | <p>Noted. No change to the draft Rural Lands Strategy.</p> <p>While it is acknowledged that this site lies adjacent to parts of the Aerotropolis, the amount of employment land rezoned in the Aerotropolis will fulfil supply requirements for many years to come. This finding is reflected in Council's Employment Lands Strategy which was endorsed in October 2021.</p> <p>In addition, the draft Local Housing Strategy which was exhibited alongside the draft Rural Lands Strategy, has found that there is enough capacity to deliver housing for the projected population in existing urban areas and urban investigation areas.</p> |
| <p>The submitter suggests that the subject site is suited as an investigation area to provide a variety of industrial, logistical and residential uses to support the Aerotropolis, due to the subject site's proximity to the Western Sydney Airport, the M12 Motorway, the M9 Motorway and the significant infrastructure investment at the site's doorstep.</p> | <p>The site lies within the MRA as identified by the Sydney Region Plan and Western City District Plan.</p> <p>The draft Rural Lands Strategy reflects the MRA by including it within our rural lands.</p> <p>Due to the fact that the draft Local Housing Strategy has found that there is enough capacity to deliver housing for the projected population in existing urban areas and urban investigation areas, there is no current need to identify additional investigation areas.</p> |
| <p>The site provides the opportunity to satisfy LSPS planning priorities 1 Aligning development with growth and infrastructure, 2 Work in partnership to unlock our opportunities, 3 Provide new homes to meet the diverse needs of our growing community and 12 Enhance and grow Penrith's economic triangle.</p> | <p>Noted. No change to the draft Rural Lands Strategy.</p> <p>The LSPS, nor any of the strategies completed since including the endorsed Employment Lands Strategy and the draft Local Housing Strategy have identified a need for this site to be developed to deliver its planning priorities.</p> |

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| | <p>The site lies within the MRA as identified by the Sydney Region Plan and Western City District Plan.</p> <p>The draft Rural Lands Strategy reflects the MRA by including it within our rural lands and recognising the area's scenic values as well as the lack of reticulated sewer to the site.</p> |
| Submission B | |
| <p>The submission notes concern with the draft Penrith Rural Lands Strategy in terms of the reliability of the mapping and the resulting potential impacts on the client's farm holding at Luddenham and seeks Council's advice in terms of the following:</p> | <p>Noted. No change to the draft Rural Lands Strategy.</p> |
| <p>Are the ecological areas in Figure 11 being applied to the farm holding? Does the ecological mapping in the draft Strategy extend well south of Park Road Wallacia into the Liverpool LGA? The submitter is not aware of any ground-truthing being done to validate the mapping and seeks advice from Council on whether that occurred.</p> | <p>Noted. No change to the draft Rural Lands Strategy.</p> <p>The draft Rural Lands Strategy does not propose to apply the ecological mapping shown in Figure 11 through planning controls. The draft Rural Lands Strategy notes that an updated biodiversity study is being completed which will be used to review and update planning controls in future. This process would require additional community engagement.</p> |
| <p>The submitter seeks clarification from Council on whether the green grid connection in the proposed Rural South West Precinct Plan crosses over the farm holding? By reference to fig 52 – Precinct 12 Green Grid Strategy Plan and Fig 10 – West District Green Grid Project Opportunities, the submitter requests that the green grid within the draft Strategy south of Park Road be removed as there is no green grid extending south of Park Road in Green Grid Strategy.</p> | <p>Noted. Amend draft Rural Lands Strategy.</p> <p>The green grid connections shown in the Rural South West precinct map (Figure 19) in the draft Rural Lands Strategy are incorrect and do not accurately reflect the endorsed Green Grid Strategy. This figure will be amended prior to finalising the Rural Lands Strategy.</p> |
| <p>The submitter is also concerned that there are no specific details as to the role of a green grid either on or in the vicinity of our client's land whether that be used such as a walking trail or a biodiversity/landscape corridor.</p> | <p>Noted. Amend draft Rural Lands Strategy.</p> <p>As outlined above, the green grid connections shown in the southern area of Figure 19 Rural South West Precinct are incorrect and do not accurately reflect the endorsed Green Grid Strategy. This figure will be amended prior to finalising the Rural Lands Strategy.</p> <p>Further information in relation to the correct links can be found in the endorsed Green Grid Strategy.</p> |
| Submission C | |
| <p>The submission opposes the identification of the site in Jamisontown as a "highly visually sensitive landscape" and any associated restrictions on development and requests that</p> | <p>Noted. No change to draft Rural Lands Strategy.</p> <p>The draft Scenic and Cultural Landscapes Study identifies this area as a "highly visually sensitive</p> |

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| <p>the site be removed from Figure 13 of the Draft Strategy and provides reasons as follows:</p> <ul style="list-style-type: none"> - The Centre is part of the existing large format retailing and employment area within Penrith City and an important bulky goods centre for the wider LGA and surrounds. - The land is already developed and has no rural values, or significant views from the public domain of the bulky goods centre to the mountains or Nepean River. - It is located within an urban area and zoned B5 Business Development (with only a small part of the landholding zoned RU4). - The landholding is not rural in characteristic and not identified as Metropolitan Rural Lands in the West District Plan. - As indicated on Figure 9 of the Strategy, the Homemaker Centre is identified as part of the Greater Penrith to Eastern Creek Growth Area. This recognises the importance of supporting economic development and urban renewal. - The Mulgoa Road Corridor from the M4 Motorway to the Penrith City Centre has emerged as the major tourism, recreation, large format retailing and mixed used corridor for the City and as such is more appropriately described as having a built up urban character not rural scenic. - Applying further development controls and guidelines could severely restrict the future development and success of Homemaker Centre. | <p>landscape” due to the views afforded from the M4 Motorway. Irrespective, the draft Rural Lands Strategy does not address the particular site as it is outside the boundary of the rural lands.</p> <p>In addition, Council’s endorsed Employment Lands Strategy identifies the broader Jamisontown precinct as an important employment precinct into the future.</p> |
| <p>The submission also seeks Council’s support for encouraging development in existing centres such as the Homemaker Centre in recognition of the importance of the centre in contributing to employment and the economy and Penrith.</p> | <p>Noted. No change to the draft Rural Lands Strategy.</p> <p>Council’s support for existing employment centres is outlined in the Employment Lands Strategy that was endorsed in October 2021. It outlines existing and future employment lands in the Penrith LGA and identifies strategic directions and actions.</p> |
| <p>Submission D</p> | |
| <p>The submission objects to the Rural Land Classification and seeks to include the Kings Hill Locality, south of Kings Hill Road Mulgoa, as</p> | <p>Noted. No change to the draft Rural Lands Strategy.</p> |

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| <p>part of future investigation areas to provide for the medium to long term housing needs for the community. The submission claims that the area is ideal for future strategic growth for the following reasons:</p> <ul style="list-style-type: none"> - It is relatively unconstrained from an environmental perspective. - It is in close proximity to the future airport making it highly desirable. - Being a continuation of development along The Northern Road heading south of Glenmore Park it is not out of character for the area. This is further supported as both the aerotropolis precinct plan and the Camden Council growth strategy identify housing development along The Northern Road corridor. - Services are nearby and can be easily extended to the site. - There is opportunity to capitalise on the aerotropolis infrastructure for the Penrith LGA | <p>The site is located within the MRA as identified in the Sydney Region and Western City District Plan. The draft Rural Lands Strategy reflects the MRA and has found that further subdivision or urban development in this location is not supported due to:</p> <ul style="list-style-type: none"> • Need to maintain existing agricultural activities operating and reduce land use conflicts; • Lack of access to reticulated sewer; and • The draft Local Housing Strategy finding that there is enough capacity to deliver necessary housing for the projected population in the existing urban areas and identified urban release areas. |
| <p>The submission includes recommendations as follows:</p> <ul style="list-style-type: none"> - The LHS further consider low-medium density housing supply for the long term forecast and acknowledge that apartment supply near centres is unlikely to meet the entire communities needs in the long term - The Rural Edge be moved to exclude the Kings Hill Locality (and possibly the entire Northern Road corridor between Glenmore Park and the aerotropolis) until further investigation is completed to identify its ideal long-term use - The Kings Hill Locality be placed into a new category “potential long term Urban Investigation Area” or similar to facilitate flexible long-term use to meet the communities’ needs | <p>Noted. No change to the draft Rural Lands Strategy.</p> <p>The site is located within the MRA as identified in the Sydney Region and Western City District Plan. The draft Rural Lands Strategy reflects the MRA and has found that further subdivision or urban development in this location is not supported due to:</p> <ul style="list-style-type: none"> • Need to maintain existing agricultural activities operating and reduce land use conflicts; • Lack of access to reticulated sewer; and • The draft Local Housing Strategy finding that there is enough capacity to deliver necessary housing for the projected population in the existing urban areas and identified urban release areas. <p>For further information please refer to the draft Local Housing Strategy.</p> |
| <p>Priority 1: With the recent Northern Road upgrade, servicing to support the Aerotropolis and Glenmore Park (GP3) rezonings, the site is relatively unconstrained and would be suitable as a future Urban Investigation area.</p> | <p>Noted. No change to the draft Rural Lands Strategy.</p> <p>The site is located within the MRA as identified in the Sydney Region and Western City District Plan. The draft Rural Lands Strategy reflects the</p> |

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| | <p>MRA and has found that further subdivision or urban development in this location is not supported due to:</p> <ul style="list-style-type: none"> • Need to maintain existing agricultural activities operating and reduce land use conflicts; • Lack of access to reticulated sewer; and <p>The draft Local Housing Strategy finding that there is enough capacity to deliver necessary housing for the projected population in the existing urban areas and identified urban release areas.</p> |
| <p>Priority 2: The site has been heavily farmed in the past, and as a result, vegetated areas across the site are largely confined to creek lines that take up around 20% of the area and would form green corridors under any alternative land use scenario. The remainder of the site would likely have a lower ecological value and could be suitable for alternative land uses.</p> <p>The Cumberland Plain Conservation Plan has not yet been finalised and Council is yet to undertake their own Biodiversity Study. Appropriate consideration has not been made to define this site as having significant ecological value that would warrant a permanent restriction on the land use.</p> | <p>Noted. No change to the draft Rural Lands Strategy.</p> <p>The site is located within the MRA as identified in the Sydney Region and Western City District Plan. The draft Rural Lands Strategy reflects the MRA and has found that further subdivision or urban development in this location is not supported due to:</p> <ul style="list-style-type: none"> • Need to maintain existing agricultural activities operating and reduce land use conflicts; • Lack of access to reticulated sewer; and • The draft Local Housing Strategy finding that there is enough capacity to deliver necessary housing for the projected population in the existing urban areas and identified urban release areas. |
| <p>Priority 3: The site was identified in the Scenic & Cultural Landscapes Study that was prepared in 2019. This study, however, did not consider the full impacts on The Northern Road upgrade, or the Aerotropolis Precinct Planning, which have had/will have a significant impact on the scenic value of the area.</p> | <p>Noted. No change to the draft Rural Lands Strategy.</p> <p>The site is located within the MRA as identified in the Sydney Region and Western City District Plan. The draft Rural Lands Strategy reflects the MRA and has found that further subdivision or urban development in this location is not supported due to:</p> <ul style="list-style-type: none"> • Need to maintain existing agricultural activities operating and reduce land use conflicts; • Lack of access to reticulated sewer; and • The draft Local Housing Strategy finding that there is enough capacity to deliver necessary housing for the |

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| | <p>projected population in the existing urban areas and identified urban release areas.</p> <p>While the supporting draft Scenic and Cultural Landscapes Study was completed prior to the completion of The Northern Road upgrade and Aerotropolis precinct planning. Irrespective, the area still holds scenic value and for this and all the reasons outlined above, the rural edge will remain as proposed in the draft Rural Lands Strategy.</p> |
| <p>Priority 4: The submitter notes that for farming and small business purposes, the lands in close proximity to the airport will likely become some of the most expensive lands in Western Sydney. This is likely to lead to issues with long term viability of farming in the area. Given the proximity to the airport, there is also a high possibility of noise, dust and light impacts on the farming uses. Because of this, the long-term use of the land should be further considered. The roads are not suitable for tourism purposes, and Penrith's tourism industry currently focuses on other areas that can be accessed via better roads.</p> | <p>Noted. No change to the draft Rural Lands Strategy.</p> <p>The site is located within the MRA as identified in the Sydney Region and Western City District Plan. The draft Rural Lands Strategy reflects the MRA and has found that further subdivision or urban development in this location is not supported due to:</p> <ul style="list-style-type: none"> • Need to maintain existing agricultural activities operating and reduce land use conflicts; • Lack of access to reticulated sewer; and • The draft Local Housing Strategy finding that there is enough capacity to deliver necessary housing for the projected population in the existing urban areas and identified urban release areas. |
| Submission E | |
| <p>The submitter refers to a landholding on the eastern side of Wallacia Village and requests council to consider amending the Rural Land Strategy to:</p> <ul style="list-style-type: none"> - Address the reduction of rural residential scale (1-2ha) lots and associated impact on economic activity by providing opportunities for new 1-2ha lots in suitable areas, such as the eastern side of Wallacia, South of Park Road. - Consider opportunities to consider rezoning land to permit rural residential scale (1-2ha) lots around Wallacia in association with maintaining rural character, delivery of improved waterway management, biodiversity protection and connectivity between | <p>Noted. No change to the draft Rural Lands Strategy.</p> <p>The site is located within the MRA as identified in the Sydney Region and Western City District Plan. The draft Rural Lands Strategy reflects the MRA and has found that further subdivision in this location is not supported due to:</p> <ul style="list-style-type: none"> • Need to maintain existing agricultural activities operating and reduce land use conflicts; • Lack of access to reticulated sewer; • Desire to retain rural character and scenic characteristics; and • The draft Local Housing Strategy finding that there is enough capacity to deliver necessary housing for the projected population in the existing |

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| <p>Strategic Conservation Areas and Jerrys Creek.</p> <ul style="list-style-type: none"> - Encourage engagement with landowners to facilitate rezoning of land use zones and minimum lot size to facilitate new 1-2ha lots. | <p>urban areas and identified urban release areas.</p> |
| Submission F | |
| <p>The draft strategy has failed to take into consideration the recommendations of the supporting studies and the evolution of land use planning outcomes surrounding the subject land holding and the broader Queens Hill Precinct as follows:</p> <ul style="list-style-type: none"> - The strategy and supporting studies fail to appropriately acknowledge the rezoning of the Aerotropolis and construction of Western Sydney Airport. - The strategy and studies fail to acknowledge the key strategic nature and location of the land holding and Queens Hill Precinct. - Upgrades to The Northern Road have been completed which the supporting studies acknowledge will change the landscape character of the area. - The supporting studies identify that the land is not suitable to be used for ongoing significant agricultural land use. - The strategy has failed to review the boundary of the Mulgoa Valley as recommended and note that the land is not visible from the balance of the Mulgoa Valley | <p>Noted. No change to the draft Rural Lands Strategy.</p> <p>The draft Rural Lands Strategy considers the Western Sydney Airport and Aerotropolis throughout the document.</p> <p>The site is located within the MRA as identified in the Sydney Region and Western City District Plan. The draft Rural Lands Strategy reflects the MRA and has found that further subdivision in this location is not supported due to:</p> <ul style="list-style-type: none"> • Need to maintain existing agricultural activities operating and reduce land use conflicts; • Lack of access to reticulated sewer; • Desire to retain rural character and scenic characteristics; and • The draft Local Housing Strategy finding that there is enough capacity to deliver necessary housing for the projected population in the existing urban areas and identified urban release areas. |
| <p>The submission requests that Council remove the subject land from the Rural Land Strategy to allow further visual and land use investigations to be completed, specifically:</p> <ul style="list-style-type: none"> • remove the scenic and cultural landscape 6 unit mapping to allow further investigations to be completed as per the recommendations and findings of the Scenic Study; • remove the highly visually sensitive landscape 5 mapping to allow confirmation that the subject land is not visible from other areas of the Mulgoa Valley | <p>Noted. No change to draft Rural Lands Strategy.</p> <p>The draft Scenic and Cultural Landscape Study recommended further analysis of the site should development be proposed. As not development is proposed no further analysis is required.</p> |
| Submission G | |

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| <p>The submitter is generally supportive of the Strategy and recommends Council consider the possibilities of rural lands in suitable strategic locations to contribute to the future growth of the area, whilst protecting their existing valuable environmental characteristics</p> <p>The submission suggests that the subject precinct in Luddenham has the potential to contribute to future growth of the area for a number of reasons:</p> <ul style="list-style-type: none"> - Proximity to the major centres and employment clusters - Connection and accessibility to the major transport corridors - Opportunity to provide housing to support the employment hubs - Opportunity to Protect of the visual landscape setting with clear and careful design - Being relatively unconstrained in terms of flooding and native vegetation - Not being used for intensive agriculture - Being relatively unfragmented, with most lots being over ten hectares in size <p>Given the future extension of density on both sides of The Northern Road within Western Sydney Aerotropolis Precinct, considering Mulgoa Creek (which borders the west of the subject precinct) as a boundary between urban and rural lands in this area would not only be more consistent with the urban boundary to the south but would provide a more natural, clearer and stronger physical and visual buffer to the Mulgoa Valley than the Northern Road</p> | <p>Noted. No change to the draft Rural Lands Strategy.</p> <p>The site is located within the MRA as identified in the Sydney Region and Western City District Plan. The draft Rural Lands Strategy reflects the MRA and has found that further subdivision in this location is not supported due to:</p> <ul style="list-style-type: none"> • Need to maintain existing agricultural activities operating and reduce land use conflicts; • Lack of access to reticulated sewer; • Desire to retain rural character and scenic characteristics; and <p>The draft Local Housing Strategy finding that there is enough capacity to deliver necessary housing for the projected population in the existing urban areas and identified urban release areas.</p> |
| Submission H | |
| <p>Objection to keeping Mulgoa Precinct as rural.</p> <p>Submission was accompanied by form letters signed by 65 people opposing Friends of Fernhill and Mulgoa Valley's proposal to list the Mulgoa Valley on the State Heritage Register</p> | <p>Noted. No change to draft Rural Lands Strategy.</p> <p>The Mulgoa precinct is part of the MRA identified by the Sydney Region and Western City District Plan.</p> <p>The draft Rural Lands Strategy reflects the MRA and has found that further subdivision in this location is not supported due to:</p> <ul style="list-style-type: none"> • Need to maintain existing agricultural activities operating and reduce land use conflicts; • Lack of access to reticulated sewer; • Desire to retain rural character and scenic characteristics; and |

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| | <ul style="list-style-type: none"> The draft Local Housing Strategy finding that there is enough capacity to deliver necessary housing for the projected population in the existing urban areas and identified urban release areas. |
| Submission I | |
| Mulgoa Road is a scenic rural road and no measures have been taken to ensure that it remains so | <p>Noted. Mulgoa Road is a State road managed by TfNSW.</p> <p>Irrespective, it is proposed to amend the draft Rural Lands Strategy to include further detail in relation to Council's aspirations for Mulgoa Road.</p> |
| Supports preserving Mulgoa Valley | Noted. No change to the draft Rural Lands Strategy. |
| Submission J | |
| From a public point of view having a say in the initial stage of this draft is appreciated but the community should also have a say when Council is proposing to spend ratepayer's monies on the final proposals. It is difficult to comment when specifics are unknown as wording in this draft is subject to individual interpretations. | <p>Noted. No change to draft Rural Lands Strategy.</p> <p>Council values community input and undertakes engagement at various points in proposal development and in line with our Community Engagement Strategy and Community Participation Plan.</p> |
| Priority 1: The rural boundaries must be clearly defined. Glenmore Park Stage 3 is clearly out of the boundary of Glenmore Park. There is major confusion created on Chain-o-Ponds Road – one side of the road urban and the other side of the road rural, one quarter of the road Glenmore Park Stage 3 and three quarters of the road Mulgoa, Half the road in Mulgoa Valley and half not in Mulgoa Valley. | <p>No change to the draft Rural Lands Strategy.</p> <p>The draft Rural Lands Strategy seeks to clarify the boundary between urban and rural land, the rural edge. An action is included to 'Use Council's planning framework to protect the rural edge as defined in the Rural Lands Strategy in the LEP'. This process of amending the LEP will require public exhibition of more detailed maps indicating the rural edge.</p> |
| Page 9: Due to the adverse impacts on rural roads and visual impacts the provision for trucking and storage should be restricted to areas supporting agricultural operations and not applicable to all of the LGA. | The draft Rural Lands Strategy will be amended to further clarify the extent to which truck parking and storage will be considered in rural areas. |
| Page 21: All rural lands roads will need major road upgrades to cater for increased traffic flows as the identified urban investigation areas are developed. | <p>Noted. No change to draft Rural Lands Strategy.</p> <p>Future planning processes relating to urban investigation areas such as planning proposals and development applications will need to consider potential traffic impacts and any necessary measures to mitigate potential impacts.</p> |
| Page 42: The scenic cultural landscape of the Northern Road Corridor at Park Road and | Noted. No change to draft Rural Lands Strategy. |

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| Northern Road will be lost with the construction of the Outer Sydney Orbital. The rural vista will not be maintained. | While the Outer Sydney Orbital Corridor has been protected by the NSW Government there is no timeframe on its construction. As such, The Northern Road scenic and cultural landscape will retain its values for the foreseeable future. |
| Page 52: It states rural villages will allow for different stages of housing needs – an aging place. However, the draft Local Housing Strategy states that seniors housing will not be permitted in Rural Villages. | Noted. No change to draft Rural Lands Strategy. A diversity of housing can be delivered in rural villages that cater to different stages of life, not just aging. These developments do not need to be dedicated seniors housing. |
| Page 78: Preparing local character statements for local villages requires community input for support and adherence. | Community engagement to assist in developing local character statements will be undertaken as part of the preparation of the Corridors and Centres Strategy. |
| All the adopted proposals for the Rural Lands Strategy must be enforced by all levels of the Council now and in the future. Please-no more DA Approvals with nine non compliances accepted and creating precedents. | Noted. No change to draft Rural Lands Strategy. The implementation plan seeks to ensure that the actions from the draft Rural Lands Strategy are implemented into the future. |
| Submission K | |
| General support of the Strategy and supportive that no likelihood of subdivision in their area (Castlereagh) in the foreseeable future. | Noted. No change to draft Rural Lands Strategy. |
| Submission L | |
| Supports subdivision of 5 acre lots zoned E4 in Castlereagh to 1.5 to 2 acre lots. This would give opportunity to expand, welcome more people, assist people financially and would not impact the overall lifestyle or environment of our community. | Noted. No change to draft Rural Lands Strategy. The draft Rural Lands Strategy considered the evidence available and concluded that further subdivision or urban development will not be supported in the rural lands, including Castlereagh, due to: <ul style="list-style-type: none"> • Need to maintain existing agricultural activities operating; • Lack of access to reticulated sewer; • Flooding impacts and limited evacuation capacity; • Significant areas of environmental significance; and • The draft Local Housing Strategy finding that there is enough capacity to deliver necessary housing for the projected population in the existing urban areas and identified urban release areas. |
| Submission M | |

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| <p>Request for rezoning their property in Llandilo and surrounding neighbouring properties for commercial or industrial use.</p> | <p>Noted. No change to draft Rural Lands Strategy.</p> <p>The draft Rural Lands Strategy considered the evidence available and concluded that further subdivision or urban development will not be supported in the rural lands, including Llandilo, due to:</p> <ul style="list-style-type: none"> • Need to maintain existing agricultural activities operating; • Lack of access to reticulated sewer; • Flooding impacts and limited evacuation capacity; • Significant areas of environmental significance; and • The draft Local Housing Strategy finding that there is enough capacity to deliver necessary housing for the projected population in the existing urban areas and identified urban release areas. |
| <p>Submission N</p> | |
| <p>Request for redeveloping Llandilo and surrounding suburbs for homes, nursing homes, age care facilities, industrial commercial etc.</p> | <p>Noted. No change to draft Rural Lands Strategy.</p> <p>The draft Rural Lands Strategy considered the evidence available and concluded that further subdivision or urban development will not be supported in the rural lands, including Llandilo, due to:</p> <ul style="list-style-type: none"> • Need to maintain existing agricultural activities operating; • Lack of access to reticulated sewer; • Flooding impacts and limited evacuation capacity; • Significant areas of environmental significance; and • The draft Local Housing Strategy finding that there is enough capacity to deliver necessary housing for the projected population in the existing urban areas and identified urban release areas. |
| <p>Submission O</p> | |
| <p>The submission suggests Council provide definition of certain terms, e.g., rural, small and home business housing diversity.</p> | <p>Noted. No change to draft Rural Lands Strategy.</p> <p>The draft Rural Lands Strategy discusses a definition of 'rural' on page 11. Other terms such as 'home business' have standard planning definitions which are provided in the LEP.</p> |

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| It is apparent certain adverse consequences of truck parking and storage in Mulgoa Valley have not been considered relative to the aims of this and related strategies. | Noted. The section of the draft Rural Lands Strategy detailing truck parking and storage will be reviewed and amended where necessary. |
| The submitter seeks clarification on the “evidence base” for guiding planning, site assessment and consultation with selected stakeholders and why just selected stakeholders. | Noted. No change to draft Rural Lands Strategy. Council publicly exhibited the draft Rural Lands Strategy for a period of 6 weeks inviting comment from any interested party. The community engagement report further outlines efforts to engage. |
| The submission also includes some questions or comments in relation to different parts of the strategy report as follows: | Noted. |
| Truck parking and storage is a significant variation to the Penrith DCP 2014 where a maximum of 2 heavy trucks (or heavy equipment) per property were specified. There is an obvious environmental risk for which, even under the existing DCP where limited truck parking is permitted, compliance cannot be enforced adequately. | Noted. The section of the draft Rural Lands Strategy detailing truck parking and storage will be reviewed and amended where necessary. |
| Small and home businesses should be consistent with the landscape and environmental character (E2, E3) of Mulgoa Valley. | Noted. No change to draft Rural Lands Strategy. Outcome 4.3 of the draft Rural Lands Strategy is clear that small businesses must be permitted in rural lands. |
| The submitter seeks clarification on the term “Needs of the Community”. Does this imply every community needs each individual services e.g., pub, servo, food outlet, etc. | Noted. No change to draft Rural Lands Strategy. The draft Rural Lands Strategy is a place-based strategy recognising that every place is unique. |
| To better understand the Strategy, can we obtain the Penrith Rural Economy and Agribusiness Opportunities Study referred to? | Noted. Noted. No change to draft Rural Lands Strategy. The submitter was provided details of how to access this supporting document. |
| Page 20 2.3.2 Western City District Plan (2018): The submitter also seeks clarification on how Council envisages “enhancing the distinctive character of each rural village”. | Noted. No change to draft Rural Lands Strategy. Character statements for the rural villages will be undertaken in conjunction with the development of the Corridors and Centres Strategy. |
| Page 36 Priority 2 - Acknowledgement of the benefits of rural areas should include the reduced impact of heat | Noted. No change to draft Rural Lands Strategy. The text on page 36 of the draft Rural Lands Strategy was an example of the benefits that rural lands rather than an exhaustive list. |
| Truck parking and noise caused by vacuum braking of moving truck on road grades contradicts priority 2. | Noted. No change to draft Rural Lands Strategy. The section of the draft Rural Lands Strategy detailing truck parking and storage will be reviewed and amended where necessary. |

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| <p>Page 39 Outcome 2.2- Waterways are maintained or improved:</p> <p>How will Council ensure appropriate controls are enforced to protect and restore waterways and riparian corridors when it still fails to enforce its LEP and DCP and when its expanded compliance section is overwhelmed with existing workload?</p> | <p>Noted. No change to draft Rural Lands Strategy.</p> <p>The draft Rural Lands Strategy includes an action to review and update planning controls with a view to protecting waterways.</p> |
| <p>Page 43 Outcome 3.2- Quality visual outcomes are achieved in highly visually sensitive landscapes:</p> <p>The submitter suggests that the present guidelines based on DCPs for protection of visually sensitive landscapes are ineffectual, at least such time until they are strengthened to withstand legal challenge.</p> | <p>Noted. No change to the draft Rural Lands Strategy.</p> <p>The planning framework in NSW is designed and managed by the NSW Government. Council only has the ability to work within the existing framework. The draft Rural Lands Strategy seeks to balance the many uses in the rural lands to achieve the best outcome possible using the tools available within the planning framework.</p> |
| <p>Page 47 Outcome 3.4- Design outcomes are enhanced in visual gateways:</p> <p>Visual gateways are a bidirectional proposition. the view towards as well as from a place is important, particularly when urban and rural areas interface (to wit: view to/from Fernhill). The last paragraph provides wriggle room and weasel words for future laxity in maintaining rural visual gateways and requires clarity of intention.</p> | <p>Noted. No change to the draft Rural Lands Strategy.</p> <p>The final paragraph on page 47 acknowledges that the South East Transition precinct will undergo significant change in the medium to long term as a result of decisions made by the NSW Government. The visual gateways identified in this particular precinct will need to be amended to reflect urban development as it occurs.</p> |
| <p>Page 50 Priority 4: Support a diverse economy:</p> <ul style="list-style-type: none"> - Does a small business need to be rural, or agribusiness related? | <p>Noted. No change to the draft Rural Lands Strategy.</p> <p>As suggested by Outcome 4.3, a small business needs to be permitted in the rural areas in the relevant land use zone. Many of the rural and conservation zones applying to Penrith City's rural lands permit home business or home industry. These definitions do not require the business to be rural or agribusiness related.</p> |
| <p>What consideration is to be given to the impact of quarrying on vistas (to wit: Wallacia sandstone quarry on ridge opposite O-Donohue's Drive, Mulgoa;)?</p> | <p>Noted. No change to the draft Rural Lands Strategy.</p> <p>Quarrying activities require planning approval before proceeding. This process would consider potential impacts of the operation including visual impacts.</p> |
| <p>How will the agribusiness network be financed and how will it include (or exclude) family farms/enterprises?</p> | <p>Noted. No change to the draft Rural Lands Strategy.</p> <p>The draft Rural Lands Strategy includes an action to establish an agriculture, food and innovation network. Once the strategy is endorsed, actions will be incorporated into Council's Operational Plan and Delivery</p> |

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| | Program ensuring funding. Further details of how the network will function including members will be determined in future. |
| “Rural land use zonings and large minimum lot sizes are applied to important agricultural land in the rural lands to encourage agricultural land uses and to prevent further fragmentation. These zonings and development controls will be maintained to protect our agricultural land.” Council has previously set a precedent negating this statement (to wit: Roscrea, Mulgoa). | Noted. No change to the draft Rural Lands Strategy. The value of having a Council endorsed Rural Lands Strategy providing direction is that it makes implementation of planning controls clearer. |
| Page 52 Outcome 4.2- Rural tourism grows and expands: Visitor accommodation will necessitate additional or enhanced effluent disposal/water collection. How will Council maintain its inspection/control of on-site disposal systems when it already cannot fulfil its inspection demand? | Noted. No change to the draft Rural Lands Strategy. Visitor accommodation is already permitted with consent in a lot of land use zones in Penrith City’s rural lands. Any application to develop visitor accommodation would require assessment of likely impacts and would include adequacy of sewerage management. |
| Page 53 Outcome 4.3 Small businesses permitted in rural lands are supported and encouraged: <ul style="list-style-type: none">- Has Council considered the impact of small businesses on areas such as Mulgoa Valley, e.g., local roads and bridges neither engineered nor built to sustain heavy loads, some having 3-ton load limits? The consequence of this is serious impact on Council rates for road repairs, maintenance and upgrades. | Noted. No change to the draft Rural Lands Strategy. Small businesses allowed in Penrith City’s rural lands are many and varied. Some of these have minimal impact. Small truck parking and storage businesses are allowed through exempt development. The draft Rural Lands Strategy includes an action to prepare site specific DCP guidelines for truck parking and storage. |
| Has Council considered the impact of structural clutter in a scenic landscape like Mulgoa Valley, exacerbated by inappropriate, non-contextual or non-existent landscaping to obscure built structures? | Noted. No change to the draft Rural Lands Strategy. The scenic value of Penrith City’s rural lands is clearly articulated in the draft Rural Lands Strategy supported by the draft Scenic and Cultural Landscapes Study. The purpose of the actions to identify and map scenic and cultural landscapes, vistas and other areas is to ensure that future development considers impacts to these values. |
| Has Council consulted with its ratepayers about the cost of mitigating adverse impacts of expanding home-based enterprises? | Noted. No change to draft Rural Lands Strategy. The draft Rural Lands Strategy was placed on public exhibition for 6 weeks seeking input from the community broadly, including ratepayers. |
| The review of the strategic planning framework (i.e., home-based businesses) appears to preface rezoning rural land for commercial use. | Noted. No change to the draft Rural Lands Strategy. The draft Rural Lands Strategy clearly defines a rural edge boundary delineating Penrith City’s rural areas from the urban areas. The draft Rural |

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| | Lands Strategy does not propose rezoning rural land for commercial use. |
| <p>Page 54 OUTCOME 4.4: Animal Boarding and Training establishments are supported and regulated by the NSW government</p> <p>The advantage of proximity to important infrastructure and consumer markets in urban areas is tenuous-to-non-existent given existing commercial pressures and land values in the Penrith LGA, specifically Mulgoa Valley.</p> | Noted. No change to draft Rural Lands Strategy. |
| <p>Page 57 Outcome 5.1: The network of rural villages and localities is reinforced: Seeking to balance demands for more intensive development while maintaining the rural character and outlook is an oxymoron. The qualities and character of rural villages accrues with its history, quaint and scenic appearance and their distinctiveness from urban or more highly developed areas.</p> | <p>Noted. No change to draft Rural Lands Strategy.</p> <p>Further work on rural villages will be undertaken as part of the Corridors and Centres Strategy which is currently under development.</p> |
| <p>Who will assess and on what parameters, the character of rural villages in creating character statements? Will these statements align with ICOMOS procedures, and will they also include a statement of significance?</p> | <p>Noted. No change to draft Rural Lands Strategy.</p> <p>Further work on character statements will be undertaken as part of the development of the Corridors and Centres Strategy. There are a number of guidelines available to guide the preparation of character statements which will all be considered.</p> |
| <p>Page 68 Priority 3- Preserve open space, natural beauty and cultural connections:</p> <p>The “action” specified for management of visual gateways requires clarification.</p> | <p>Noted. No change to draft Rural Lands Strategy.</p> <p>Without further detail about what the submitter needs clarifying, it is difficult to address this issue.</p> |
| <p>How will the proposed cemetery at Wallacia impact on open space and recreation opportunities in Wallacia?</p> | <p>Noted. No change to the draft Rural Lands Strategy.</p> <p>Council’s Sport and Recreation Strategy was endorsed in 2020 and addresses recreation needs for the Penrith LGA. This document outlines actions to continue to deliver recreation space for the Penrith community.</p> |
| <p>Page 75 4.2 Implementation Plan 4.2.1 Council’s Role:</p> <ul style="list-style-type: none"> - The roles of Council represent a conflict of interest amongst the 5 roles and lacks transparency. | <p>Noted. No change to the draft Rural Lands Strategy.</p> <p>The purpose of the Implementation Plan is to clearly outline actions Council will commit to and increase transparency. Without further detail of the submitter’s concerns it is difficult to suggest how the draft Rural Lands Strategy could be improved to address this concern.</p> |
| <p>Page 77 Table of Priority 3 Preserve Open Space, Natural Beauty and Cultural Connections):</p> | <p>Noted. No change to the draft Rural Lands Strategy.</p> <p>The actions identified in the Implementation Plan for Priority 3 apply to the rural lands of Penrith</p> |

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| <p>How will Council meet these obligations if Greater Sydney Parklands is the consent authority for Fernhill and could override Council strategies.</p> | <p>City more broadly, rather than being specific to Fernhill Estate.</p> <p>Where a rural vista or scenic and cultural landscape includes areas owned by NSW Government (such as Fernhill Estate), Council's approach is to clearly outline our position in the draft Rural Lands Strategy so that we can advocate to NSW Government for the best outcome for our community.</p> |
| <p>Page 78 Table (Priority Action 4, Action 17): What are localised complying developments and how will they be regulated/confirmed as complying?</p> | <p>Noted. No change to the draft Rural Lands Strategy.</p> <p>This statement is part of an action in the draft Rural Lands Strategy to review and update the LEP and DCP to facilitate appropriate small business in rural lands. The scope of this review will be guided by the draft Rural Lands Strategy with further detail determined as the action progresses.</p> |
| <p>Submission P</p> | |
| <p>The submitter disagrees with keeping his Llandilo property and surrounding areas as rural stating that his poultry business cannot be expanded due to the proximity of residential development in Jordan Springs and it is not feasible to continue to run it on a 5-acre block.</p> | <p>Noted. No change to draft Rural Lands Strategy.</p> <p>The draft Rural Lands Strategy considered the evidence available and concluded that further subdivision or urban development will not be supported in the rural lands, including Llandilo, due to:</p> <ul style="list-style-type: none"> • Need to maintain existing agricultural activities operating; • Lack of access to reticulated sewer; • Flooding impacts and limited evacuation capacity; • Significant areas of environmental significance; and • The draft Local Housing Strategy finding that there is enough capacity to deliver necessary housing for the projected population in the existing urban areas and identified urban release areas. |
| <p>Submission Q</p> | |
| <p>The submitter disagrees with his property being changed to green area and would rather leave it rural.</p> | <p>It is unclear what the submitter means by 'green area'. The draft Rural Lands Strategy proposes to retain the subject property as rural land.</p> <p>The property is also identified as a Highly Visually Sensitive Landscape. The draft Rural Lands Strategy includes an action to:</p> <p><i>Map the highly visually sensitive landscapes and important rural vistas and incorporate matters</i></p> |

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| | <i>for consideration for development in these areas in the DCP.</i> |
| Submission R | |
| The submitters disagree keeping their property in Llandilo and the surrounding area as rural. | <p>Noted. No change to draft Rural Lands Strategy.</p> <p>The draft Rural Lands Strategy considered the evidence available and concluded that further subdivision or urban development will not be supported in the rural lands, including Llandilo, due to:</p> <ul style="list-style-type: none"> • Need to maintain existing agricultural activities operating; • Lack of access to reticulated sewer; • Flooding impacts and limited evacuation capacity; • Significant areas of environmental significance; and • The draft Local Housing Strategy finding that there is enough capacity to deliver necessary housing for the projected population in the existing urban areas and identified urban release areas. |
| Submission S | |
| Object to the Strategy to keep their property in Luddenham rural. Would prefer that the area be redeveloped | <p>Noted. No change to draft Rural Lands Strategy.</p> <p>The draft Rural Lands Strategy considered the evidence available and concluded that further subdivision or urban development will not be supported in the rural lands, including Luddenham, due to:</p> <ul style="list-style-type: none"> • Need to maintain existing agricultural activities operating; • Lack of access to reticulated sewer; and • The draft Local Housing Strategy finding that there is enough capacity to deliver necessary housing for the projected population in the existing urban areas and identified urban release areas. |
| Submission T | |
| The submitter requests her land in Llandilo be released for subdivision. | <p>Noted. No change to draft Rural Lands Strategy.</p> <p>The draft Rural Lands Strategy considered the evidence available and concluded that further subdivision or urban development will not be</p> |

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| | <p>supported in the rural lands, including Llandilo, due to:</p> <ul style="list-style-type: none"> • Need to maintain existing agricultural activities operating; • Lack of access to reticulated sewer; • Flooding impacts and limited evacuation capacity; • Significant areas of environmental significance; and • The draft Local Housing Strategy finding that there is enough capacity to deliver necessary housing for the projected population in the existing urban areas and identified urban release areas. |
| Submission U | |
| <p>The submitter disagrees with rezoning of their land at Luddenham to scenic on the basis that:</p> <ul style="list-style-type: none"> • They were not notified by Council • The rezoning will be a substantial financial disadvantage | <p>It is understood that the submitter is objecting to having their land identified as part of a Scenic and Cultural Landscape, however, based on the address provided the land is not identified as a Scenic and Cultural Landscape.</p> |
| Submission V | |
| <p>The submitter supports the idea of subdivision of her land and the surrounding area in Castlereagh to ¼ acre, ½ acre and 1 acre block sizes similar to Windsor Downs. This type of development would not impact on the ability of people to run their home businesses, would maintain rural outlook and most areas are not flood liable.</p> | <p>Noted. No change to draft Rural Lands Strategy.</p> <p>The draft Rural Lands Strategy considered the evidence available and concluded that further subdivision or urban development will not be supported in the rural lands, including Castlereagh, due to:</p> <ul style="list-style-type: none"> • Need to maintain existing agricultural activities operating; • Lack of access to reticulated sewer; • Flooding impacts and limited evacuation capacity; • Significant areas of environmental significance; and • The draft Local Housing Strategy finding that there is enough capacity to deliver necessary housing for the projected population in the existing urban areas and identified urban release areas. |
| <p>Concern over lack of direct and early notification of residents and lack of community meetings.</p> | <p>Noted. No change to draft Rural Lands Strategy.</p> <p>Council used a number of ways to advise the community of the exhibition of the Rural Lands</p> |

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| | <p>Strategy and were in attendance at 6 drop-in sessions. This is considered appropriate level of engagement. Further details of the activities undertaken can be found in the Community Engagement Report.</p> |
| <p>Only residential expansion will be within existing rural villages i.e. Londonderry, Luddenham and Wallacia – note ageing populations (page 57 – 58) but the ageing population are in all rural areas not just those with rural villages. The current villages (i.e., Londonderry, Wallacia and Luddenham) will not cater for everyone who live on rural land to be close by.</p> | <p>Noted. No change to draft Rural Lands Strategy.</p> <p>Due to its priority to secure the rural edge, the draft Rural Lands Strategy has identified that housing diversity is only appropriate to be delivered within the boundaries of the rural villages of Londonderry, Wallacia and Mulgoa.</p> |
| <p>What restrictions are going to be imposed on rural landowners to protect vegetation to secure private conservation agreements?</p> | <p>Noted. No change to the draft Rural Lands Strategy.</p> <p>The draft Rural Lands Strategy does not propose to force landowners to enter private conservation agreements, but rather to educate landowners on the options available to them to conserve their land should they so wish.</p> |
| <p>What restrictions will there be for those rural landowners along the rural – Scenic and Cultural Landscapes i.e. a lot of properties along Castlereagh Rd, Mulgoa Valley and Nepean River Corridor to place restrictions upon</p> | <p>Noted. No change to the draft Rural Lands Strategy.</p> <p>The draft Rural Lands Strategy includes an action to map scenic and cultural landscapes in the LEP and DCP. This process will require a separate public exhibition period that outlines the specific controls proposed to be included in the LEP and DCP, providing a further opportunity for public comment.</p> |
| <p>What restrictions (control of land use and development) are going to be placed on properties which are considered as Highly Visually Sensitive Landscapes (Page 43 – 45) i.e., Orchard Hills views from the M4, M4 Motorway crossing from Nepean River towards Regentville, Penrith and Jamisontown – shouldn't drivers have their eyes on the road ahead – some already have up sound barrier walls which will block the view on part – what is the difference</p> | <p>Noted. No change to the draft Rural Lands Strategy.</p> <p>The draft Rural Lands Strategy includes an action to map highly visually sensitive landscapes in the DCP. This process will require a separate public exhibition period that outlines the specific controls proposed to be included in the DCP, providing a further opportunity for public comment.</p> |
| <p>Visual Gateways and assistance with Way Finding – (Page 47 – Page 49) – again what restrictions are proposed for those properties who fall into these 23 visual gateways?</p> | <p>Noted. No change to the draft Rural Lands Strategy.</p> <p>Visual gateways are already included in DCP (refer to Section C1 Site Planning and Design Principles). The action in the draft Rural Lands Strategy is to amend the existing controls to align with the outcomes of the draft Scenic and Cultural Landscapes Study. Any amendments to the DCP would require additional public</p> |

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| | engagement, providing a further opportunity to comment. |
| How will council be supporting a diverse rural economy (Page 50 – 55) and Small Business – in the past always discouraged businesses with too many restrictions. Agriculture activities are not carried on by the younger generations so how will Council be building up this activity? | Noted. No change to the draft Rural Lands Strategy. The draft Rural Lands Strategy includes several actions to try to support agriculture in Penrith City's rural lands including working with existing poultry operators, establishing an agriculture, food and innovation network and investigating the establishment of farmer's markets. |
| Rural Farm Stays (page 52)– means more temporary housing opportunities – are Council going to allow this – currently even dual occupation is an issue for council on 5 acres? Previously not allowed more housing due to Flood Evacuation Route being impacted – seems like a change of opinion from Council here | Noted. No change to the draft Rural Lands Strategy. The draft Rural Lands Strategy recognises that there is potential to expand tourism. A number of land uses such as visitor accommodation are already permitted with consent in a number of the lands use zones throughout the rural lands. Of course, development such as this requires a development application that will consider potential impacts of the proposed development. |
| What will be classified as small-scale truck parking? How many trucks will be allowed for the average 5-acre property for home businesses – had been at 2 trucks and equipment – what will be maximum allowed? | The draft Rural Lands Strategy acknowledges that truck parking and storage occurs in the rural lands and includes an action to prepare site specific guidelines in the DCP. |
| What restrictions are proposed in relation to animal boarding | Noted. No change to the draft Rural Lands Strategy. The draft Rural Lands Strategy does not propose to change any restrictions relating to animal boarding. |
| Submission W | |
| The submitter would like their land in Luddenham to remain zoned RU2 (not be environmental zone). | Noted. No change to draft Rural Lands Strategy. The draft Rural Lands Strategy does not propose to rezoned land from RU2. |
| Disappointed that they are within the Metropolitan Rural Area as they are unlikely to see future development in their lifetime. Support growth and development in the area. | Noted. No change to draft Rural Lands Strategy. The draft Rural Lands Strategy considered the evidence available and concluded that further subdivision or urban development will not be supported in the rural lands, including Luddenham, due to: <ul style="list-style-type: none"> • Need to maintain existing agricultural activities operating; • Lack of access to reticulated sewer; and • The draft Local Housing Strategy finding that there is enough capacity to deliver necessary housing for the |

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| | projected population in the existing urban areas and identified urban release areas. |
| The submitters also disagree with the West District Green Grid which goes through their properties. They mentioned that the area has enough trees and greenery and more trees in their area will obscure their view of the Blue Mountains. | The green grid connections shown on the Rural South West Precinct map are incorrect and not consistent with the endorsed Green Grid Strategy. The figure will be updated prior to finalising the draft Rural Lands Strategy. |
| Disappointed that they weren't notified of the community drop-in sessions. | Noted. No change to draft Rural Lands Strategy. Council used a number of ways to advise the community of the exhibition of the Rural Lands Strategy and were in attendance at 6 drop-in sessions. This is considered appropriate level of engagement. Further details of the activities undertaken can be found in the Community Engagement Report. |
| Submission X | |
| The submitter suggests that Council supports the Deerubbin Local Aboriginal Land Council's Penrith Structure Plan proposal which is the biggest land clearing development ever proposed in Penrith. The submission states that the areas (ha) quoted in the Strategy are incorrect. The submission also states that the Strategy misrepresents Council as a passive responder to the DLALC proposal and that the Strategy fails to provide information of note to the public. | In relation to the lands owned by the DLALC, the draft Rural Lands Strategy reflects an announcement made by the NSW Government in late 2021 regarding an agreement with DLALC to progress the assessment of the Penrith Structure Plan. Specifically, the draft Rural Lands Strategy states: <i>The NSW Government has recently announced that they are working with one of Penrith's largest private landowners, Deerubbin Local Aboriginal Land Council (DLALC), to achieve a balance of development and conservation on their lands...The agreement with the NSW Government will fast track preparation of the biodiversity assessment and approvals for DLALC's land, protecting around 1,100 hectares of native vegetation, while enabling DLALC to realise the socio-economic opportunities of their lands and will be an extension to the Cumberland Plain Conservation Plan's conservation program.</i> This information is consistent with publicly available information on the following NSW Government websites: https://www.environment.nsw.gov.au/news/key-piece-of-western-sydneyconservation-puzzle-to-be-protected https://www.planning.nsw.gov.au/Policy-and-Legislation/Strategicconservation-planning/Cumberland-Plain-Conservation-Plan/Plan-update In addition, the draft Rural Lands Strategy includes an action as follows: <i>Work with the Department of Planning and Environment and Deerubbin Local</i> |

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| | <p><i>Aboriginal Land Council to progress the amendment to the Cumberland Plain Conservation Plan for the deferred lands.</i></p> <p>The draft Rural Lands Strategy will be amended to provide clarity around the agreement between DLALC and NSW Government and confirmation that future uses on DLALC land will be subject to the assessment of the Penrith Structure Plan by the NSW Government. The outcome of this process will enable Council to respond to the structure plan in future.</p> |
| <p>The submitter states that Council has failed to conduct an Aboriginal Cultural Heritage Study resulting in the prevention of Traditional owners and the broader Aboriginal community having a voice in the draft RLS. The RLS must be deferred until necessary studies including an appropriate Aboriginal Cultural Heritage Study can be completed.</p> | <p>The draft Rural Lands Strategy acknowledges this issue by stating: <i>...there is currently limited information about natural landscapes that are significant for Aboriginal cultural identity and connection to the land. As a result, there may be additional landscapes of cultural importance not currently identified or additional values that should be recognised.</i></p> <p>The draft Rural Lands Strategy includes the following action: <i>Work with Aboriginal and Torres Strait Islander stakeholders to identify and protect significant Aboriginal cultural landscapes in Penrith City's rural areas.</i></p> <p>The timeframe for this action is 'short' meaning that the action will occur over the next 1-2 years.</p> |
| <p>Does not support statement in Strategy 'Proactively planning for the rehabilitation and re-use of quarry sites post production can support broader conservation and economic outcomes'.</p> | <p>Noted. No change to draft Rural Lands Strategy.</p> |
| Submission Y | |
| <p>The submitter owns property located in Llandilo which is currently zoned RU4. Based on personal experience, the land is not suitable for primary agriculture and seeks the support of the council to rezone the land for residential or commercial purposes.</p> | <p>Noted. No change to draft Rural Lands Strategy.</p> <p>The draft Rural Lands Strategy considered the evidence available and concluded that further subdivision or urban development will not be supported in the rural lands, including Llandilo, due to:</p> <ul style="list-style-type: none"> • Need to maintain existing agricultural activities operating; • Lack of access to reticulated sewer; • Flooding impacts and limited evacuation capacity; • Significant areas of environmental significance; and • The draft Local Housing Strategy finding that there is enough capacity to deliver necessary housing for the |

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| | projected population in the existing urban areas and identified urban release areas. |
| Submission Z | |
| <p>Owners of property located in Luddenham strongly oppose the implementation of the draft Rural Lands Strategy and seek rezoning of their land.</p> <p>The submitters ask for an opportunity to provide housing for the employment hubs by creating well designed pockets of larger residential allotment developments in the subject site that have good access to the infrastructure being developed to support the airport.</p> | <p>Noted. No change to draft Rural Lands Strategy.</p> <p>The draft Rural Lands Strategy considered the evidence available and concluded that further subdivision or urban development will not be supported in the rural lands, including Luddenham, due to:</p> <ul style="list-style-type: none"> • Need to maintain existing agricultural activities operating; • Lack of access to reticulated sewer; • Flooding impacts and limited evacuation capacity; • Significant areas of environmental significance; and • The draft Local Housing Strategy finding that there is enough capacity to deliver necessary housing for the projected population in the existing urban areas and identified urban release areas. |
| <p>The submitters object to the lack of direct notification to landowners in terms of the public exhibition of the draft RLS.</p> | <p>Noted. No change to draft Rural Lands Strategy.</p> <p>Council used a number of ways to advise the community of the exhibition of the Rural Lands Strategy and were in attendance at 6 drop-in sessions. This is considered appropriate level of engagement. Further details of the activities undertaken can be found in the Community Engagement Report.</p> |
| Submission AA | |
| <p>The submission claims that the Strategy is flawed by marking areas for rural land preservation that are already compromised by the airport and increasing urbanisation in western suburbs such as Penrith.</p> | <p>Noted. No change to the draft Rural Lands Strategy.</p> <p>The rural edge boundary identified in the draft Rural Lands Strategy reflects the MRA boundary identified by the NSW Government in the Sydney Region Plan and Western City District Plan.</p> <p>The draft Rural Lands Strategy considered the evidence available and concluded that further subdivision or urban development will not be supported in the rural lands due to:</p> <ul style="list-style-type: none"> • Need to maintain existing agricultural activities operating; |

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| | <ul style="list-style-type: none"> • Lack of access to reticulated sewer; • Flooding impacts and limited evacuation capacity; • Significant areas of environmental significance; and • The draft Local Housing Strategy finding that there is enough capacity to deliver necessary housing for the projected population in the existing urban areas and identified urban release areas. |
| Ecological health and biodiversity can be protected, and open space, natural beauty and cultural connections can be preserved by encouragement rather than force such as through Greater Sydney Parklands plans for Fernhill Estate and open space around the airport. | <p>Noted. No change to the draft Rural Lands Strategy.</p> <p>The draft Rural Lands Strategy found that there are significant biodiversity values, scenic values and cultural connections that are not on publicly owned land. As such, the draft Rural Lands Strategy proposes actions to protect and preserve these values through a variety of actions.</p> |
| The submitter does not agree that a diverse rural economy can be achieved in this area which will be right next to an international airport there is very little to attract tourists or visitors to the area. | <p>Noted. No change to the draft Rural Lands Strategy.</p> <p>The priority for a diverse rural economy considers more than just tourism. This includes all types of agriculture and agriculture related businesses in addition to small business.</p> |
| Housing and services are a huge need, and the enforcement of rural lands completely opposes the existing housing deficit. | <p>Noted. No change to the draft Rural Lands Strategy.</p> <p>This comment does not align with Council's findings in the draft Local Housing Strategy. The draft Local Housing Strategy has found that there is enough land within existing urban areas and identified urban investigation areas to accommodate housing for the projects population.</p> |
| Submission AB | |
| <p>The submitter suggests that Berkshire Park, Llandilo and Londonderry are suitable for housing developments to connect to Richmond and Windsor urban areas and provides reasons as follows:</p> <ul style="list-style-type: none"> - Population of Penrith LGA is expected to reach 292,000 by 2031. - The demand for housing in the area is high with easy access to established large centres of Penrith, Kingswood, Cranebrook, St Marys, Mount Druitt, | <p>Noted. No change to draft Rural Lands Strategy.</p> <p>The draft Rural Lands Strategy considered the evidence available and concluded that further subdivision or urban development will not be supported in the rural lands, including Berkshire Park, Llandilo, and Londonderry, due to:</p> <ul style="list-style-type: none"> • Need to maintain existing agricultural activities operating and not creating further land use conflicts. A number of these agricultural activities are not |

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| <p>Marsden Park City Centre, Windsor and Richmond.</p> <ul style="list-style-type: none"> - Most of the land around the Berkshire Park/Llandilo area is above the probable maximum flood level which is a good opportunity to build new dwellings. - Many lots in the Penrith Northern Rural Lands have soils unsuitable for market gardening as they are covered in large rocks. 90% of residents the Penrith Northern Rural lands do not farm for income and a large number of the market gardens will be closed in early future. | <p>dependent on good quality soils to operate effectively;</p> <ul style="list-style-type: none"> • Lack of access to reticulated sewer; • Flooding impacts and limited evacuation capacity; • Significant areas of environmental significance; and • The draft Local Housing Strategy finding that there is enough capacity to deliver necessary housing for the projected population in the existing urban areas and identified urban release areas. |
| Submission AC | |
| <p>The submitters wish their property in Luddenham to remain zoned RU2 (not be environmental zone). They seek an assurance that the 'scenic and cultural landscape' designation does not rezone their land.</p> | <p>The draft Rural Lands Strategy does not rezone land. In the case of the submitters land, the Strategy seeks to retain the existing zoning.</p> <p>The identification of land as a Scenic and Cultural Landscape is not a land use zone. The draft Rural Lands Strategy includes an action that these Scenic and Cultural Landscapes are mapped in the LEP with statements of significance included in the DCP. Amendments to the LEP and DCP will require a separate process that would include a period of public exhibition.</p> |
| <p>The submitters are disappointed that they are within the Metropolitan Rural Area as they are unlikely to see future development in their lifetime. They support growth and development in the area.</p> | <p>Noted. No change to draft Rural Lands Strategy.</p> <p>The draft Rural Lands Strategy considered the evidence available and concluded that further subdivision or urban development will not be supported in the rural lands, including Luddenham, due to:</p> <ul style="list-style-type: none"> • Need to maintain existing agricultural activities operating; • Lack of access to reticulated sewer; and • The draft Local Housing Strategy finding that there is enough capacity to deliver necessary housing for the projected population in the existing urban areas and identified urban release areas. |
| Submission AD | |
| <p>The submitter is disappointed she was not informed of the public exhibition of the draft Rural Lands Strategy by mail.</p> | <p>Noted. No change to draft Rural Lands Strategy.</p> <p>Council used a number of ways to advise the community of the exhibition of the Rural Lands</p> |

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| | Strategy and were in attendance at 6 drop-in sessions. This is considered appropriate level of engagement. Further details of the activities undertaken can be found in the Community Engagement Report. |
| The submitter supports subdivision of their property (The location of submitter's property is not mentioned). | <p>Noted. No change to draft Rural Lands Strategy.</p> <p>The draft Rural Lands Strategy considered the evidence available and concluded that further subdivision or urban development will not be supported in the rural lands due to:</p> <ul style="list-style-type: none"> • Need to maintain existing agricultural activities operating; • Lack of access to reticulated sewer; • Flooding impacts and limited evacuation capacity; • Significant areas of environmental significance; and • The draft Local Housing Strategy finding that there is enough capacity to deliver necessary housing for the projected population in the existing urban areas and identified urban release areas. |
| Submission AE | |
| The submitter claims that the community has not been properly notified of the Strategy. | <p>Noted. No change to draft Rural Lands Strategy.</p> <p>Council used a number of ways to advise the community of the exhibition of the Rural Lands Strategy and were in attendance at 6 drop-in sessions. This is considered appropriate level of engagement. Further details of the activities undertaken can be found in the Community Engagement Report.</p> |
| <p>The submitter objects to the strategy and requests Council that their land in Mulgoa be able to be subdivided.</p> <p>The submitter suggests that 2.5 – 5 acre lots would still be semi-rural and make the area more attractive, easier to maintain and safer to live in.</p> | <p>Noted. No change to draft Rural Lands Strategy.</p> <p>The draft Rural Lands Strategy considered the evidence available and concluded that further subdivision will not be supported in the rural lands due to:</p> <ul style="list-style-type: none"> • Need to maintain existing agricultural activities operating and reduce land use conflicts; • Lack of access to reticulated sewer; • Flooding impacts and limited evacuation capacity; • Significant areas of environmental significance; and |

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| | <ul style="list-style-type: none"> The draft Local Housing Strategy finding that there is enough capacity to deliver necessary housing for the projected population in the existing urban areas and identified urban release areas. |
| The submitter suggests that the draft Rural Lands Strategy does not consider property owner's individual needs and that the ideas put forward by the priorities are too broad. | <p>Noted. No change to draft Rural Lands Strategy.</p> <p>Land use planning strategies by their very nature are broad. It is not planning's role to consider individual needs of property owners, rather we consider evidence and information available to deliver the best outcome for the broader public interest.</p> |
| Submission AF | |
| The submitter refers to a property in Luddenham and does not agree with it being rezoned to green space. They request Council to rezone the property to agribusiness. | <p>It is unclear what the submitter is referring to as 'green space'. The draft Rural Lands Strategy does not seek to rezone land to 'green space'. Rather the Strategy seeks to clearly identify the extent of rural lands by mapping a rural edge. The submitter's property is within the area identified as future rural lands.</p> <p>While the subject property is within Luddenham, it is not within the Western Sydney Aerotropolis Agribusiness precinct and has not be rezoned as such. Based on the fact that the subject property is within the MRA and identified as rural, Council does not support rezoning to agribusiness.</p> |
| Submission AG | |
| The submitter disagrees with locking all the land to the south of Glenmore Park up as rural and suggests that the draft Rural Lands Strategy should take into account the economic benefits that the airport will create. There needs to be a balance of development and rural/environmental importance. | <p>Noted. No change to draft Rural Lands Strategy.</p> <p>The draft Rural Lands Strategy considered the evidence available and concluded that further subdivision or urban development will not be supported in the rural lands due to:</p> <ul style="list-style-type: none"> Need to maintain existing agricultural activities operating; Lack of access to reticulated sewer; Flooding impacts and limited evacuation capacity; Significant areas of environmental significance; and The draft Local Housing Strategy finding that there is enough capacity to deliver necessary housing for the projected population in the existing urban areas and identified urban release areas. |

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| <p>The submitter opposes the minimal residential housing proposed in Mulgoa village. Limiting housing makes property more scarce. People should be able to build houses on their properties for their children or parents. The red tape to be able to build on properties is excessive compared to other Councils in Sydney and the submitter is concerned the draft Rural Lands Strategy will impose further red tape.</p> | <p>Noted. No change to draft Rural Lands Strategy.</p> <p>The draft Local Housing Strategy found that there is enough capacity to deliver necessary housing for the projected population in the existing urban areas and identified urban release areas without needing to rezone or further subdivide rural areas.</p> <p>It is not the intention of the draft Rural Lands Strategy to impose further red tape.</p> |
| <p>He also claims that the community has not been properly notified of the Strategy in order to have a proper say. The maps in the Strategy are not detailed enough to work out where their property is located. Landowners should be directly notified.</p> | <p>Noted. No change to draft Rural Lands Strategy.</p> <p>Council used a number of ways to advise the community of the exhibition of the Rural Lands Strategy and were in attendance at 6 drop-in sessions. This is considered appropriate level of engagement. Further details of the activities undertaken can be found in the Community Engagement Report.</p> |
| <p>Submission AH</p> | |
| <p>The submission claims that the community has not been properly notified of the Strategy in order to have a proper say.</p> | <p>Noted. No change to draft Rural Lands Strategy.</p> <p>Council used a number of ways to advise the community of the exhibition of the Rural Lands Strategy and were in attendance at 6 drop-in sessions. This is considered appropriate level of engagement. Further details of the activities undertaken can be found in the Community Engagement Report.</p> |
| <p>The submitter is against any proposal in the Draft Rural Lands Strategy that will lock up rural lands to residential development for twenty years or any consideration by council not to plan residential development on rural lands.</p> | <p>Noted. No change to draft Rural Lands Strategy.</p> <p>The draft Rural Lands Strategy considered the evidence available and concluded that further subdivision or urban development will not be supported in the rural lands due to:</p> <ul style="list-style-type: none"> • Need to maintain existing agricultural activities operating; • Lack of access to reticulated sewer; • Flooding impacts and limited evacuation capacity; • Significant areas of environmental significance; and • The draft Local Housing Strategy finding that there is enough capacity to deliver necessary housing for the projected population in the existing urban areas and identified urban release areas. |
| <p>Submission AI</p> | |

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| <p>The submitter suggests that Llandilo should now be developed as Jordan Springs is almost fully developed.</p> | <p>Noted. No change to draft Rural Lands Strategy.</p> <p>The draft Rural Lands Strategy considered the evidence available and concluded that further subdivision or urban development will not be supported in the rural lands, including Llandilo, due to:</p> <ul style="list-style-type: none"> • Need to maintain existing agricultural activities operating; • Lack of access to reticulated sewer; • Flooding impacts and limited evacuation capacity; • Significant areas of environmental significance; and • The draft Local Housing Strategy finding that there is enough capacity to deliver necessary housing for the projected population in the existing urban areas and identified urban release areas. |
| Submission AJ | |
| <p>The submitter claims that the community has not been properly notified of the Strategy.</p> | <p>Noted. No change to draft Rural Lands Strategy.</p> <p>Council used a number of ways to advise the community of the exhibition of the Rural Lands Strategy and were in attendance at 6 drop-in sessions. This is considered appropriate level of engagement. Further details of the activities undertaken can be found in the Community Engagement Report.</p> |
| <p>The submitter is against keeping the Mulgoa area rural and provides reasons as follows:</p> <ul style="list-style-type: none"> - It is hard enough to get something passed through the Council now, and with another policy and locking the area as rural, it will become much harder to get things passed. For example, building a shed or building a second dwelling etc. - Being in close proximity of a new airport and a new rail line is not in line with preventing the area from future development. - If the property is 'locked in' it will devalue it. | <p>Noted. No change to draft Rural Lands Strategy.</p> <p>The draft Local Housing Strategy found that there is enough capacity to deliver necessary housing for the projected population in the existing urban areas and identified urban release areas without needing to rezone or further subdivide rural areas.</p> |
| Submission AK | |
| <p>The submitter objects to the inadequate notifying the community of the Strategy.</p> | <p>Noted. No change to draft Rural Lands Strategy.</p> <p>Council used a number of ways to advise the community of the exhibition of the Rural Lands</p> |

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| | Strategy and were in attendance at 6 drop-in sessions. This is considered appropriate level of engagement. Further details of the activities undertaken can be found in the Community Engagement Report. |
| Submission AL | |
| The submitter states that more planning must allow for the new aerotropolis. The mapping provided has the entire area south of Orchard Hills and Glenmore Park shaded for rural land in future, but considering developments such as the aerotropolis and Sydney Science Park, the area around it should allow for commercial and residential developments. This can be done by allowing the Orchard Hills defence site and areas to the west of Mulgoa Road along the Nepean River to be kept as areas of environmental importance. There needs to be a balance between future growth and rural/environmental protection. | <p>Noted. No change to draft Rural Lands Strategy.</p> <p>The draft Rural Lands Strategy recognises that much of the land from Orchard Hills south will, at some time in the future transition to urban development as it is nominated as an urban investigation area or part of the Western Sydney Aerotropolis.</p> <p>The fact that such a large area will transition away from rural lands, makes the protection of the remaining rural lands, more important. This is what is reflected in the draft Rural Lands Strategy.</p> |
| The submitter opposes the minimal residential housing being allowed for in Mulgoa village. This makes it harder when putting plans in to Council for building a house on a property. As property gets more scarce, it shouldn't be made hard for people wanting to build houses for their children or aging parents. | <p>Noted. No change to draft Rural Lands Strategy.</p> <p>The draft Local Housing Strategy found that there is enough capacity to deliver necessary housing for the projected population in the existing urban areas and identified urban release areas without needing to rezone or further subdivide rural areas.</p> |
| The community has not been properly notified of the Strategy in order to have a proper say. Also, the maps are not clear enough to allow people to determine where their property is. | <p>Noted. No change to draft Rural Lands Strategy.</p> <p>Council used a number of ways to advise the community of the exhibition of the Rural Lands Strategy and were in attendance at 6 drop-in sessions. This is considered appropriate level of engagement. Further details of the activities undertaken can be found in the Community Engagement Report.</p> |
| Submission AM | |
| The submitter objects to his client's property in Luddenham being included in the proposed highly visually sensitive landscape VSL5 providing reasons as follows: <ul style="list-style-type: none"> - The Draft Penrith Scenic and Cultural Landscapes Study from 2019 at paragraph 4.2 makes it clear that no new survey took place to identify scenic and cultural landscapes and that it has relied on the 2006 comprehensive study. - The property has been identified in the 2006 study as not being a Primary Visual Backdrop and not visible from | <p>Noted. No change to draft Rural Lands Strategy.</p> <p>The reference in the Draft Penrith Scenic and Cultural Landscapes Study to the 2006 Penrith Landscape Character Strategy related to the identification of Scenic and Cultural Landscapes. The subject site has not been identified as part of a Scenic and Cultural Landscape in the draft Rural Lands Strategy.</p> <p>The subject site is within the area identified as a Highly Visually Sensitive Landscape. In Section 4.4, the Draft Scenic and Cultural Landscapes Study notes that 'These landscapes with a high visual-sensitivity were identified through existing information, input from Council officers, analysis</p> |

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| <p>major public gathering places or thoroughfares.</p> <ul style="list-style-type: none"> - Therefore, it is unreasonable and contrary to the evidence to consider that the property is within an area of 'Highly Visually Sensitive Landscape'. | <p>of online topographic and aerial mapping and ground truthing'.</p> |
| Submission AN | |
| <p>The submitter's land in Berkshire Park is within a non-housing and non-commercial growth area that is not satisfactory.</p> | <p>Noted. No change to draft Rural Lands Strategy.</p> <p>The draft Rural Lands Strategy considered the evidence available and concluded that further subdivision or urban development will not be supported in the rural lands, including Berkshire Park, due to:</p> <ul style="list-style-type: none"> • Need to maintain existing agricultural activities operating; • Lack of access to reticulated sewer; • Flooding impacts and limited evacuation capacity; • Significant areas of environmental significance; and • The draft Local Housing Strategy finding that there is enough capacity to deliver necessary housing for the projected population in the existing urban areas and identified urban release areas. |
| Submission AO | |
| <p>Landowners should have a say on whether or not their land gets developed. The submitter and their neighbours have been waiting for development.</p> | <p>Noted. No change to the draft Rural Lands Strategy.</p> <p>Council placed the draft Rural Lands Strategy on exhibition to allow the community, including landowners with a chance to provide feedback on the draft document.</p> |
| Submission AP | |
| <p>The way that the Rural Lands Strategy was advertised was extremely disappointing and suggests that it would have been appropriate to advertise the strategy through letter or pamphlet distribution.</p> | <p>Noted. No change to draft Rural Lands Strategy.</p> <p>Council used a number of ways to advise the community of the exhibition of the Rural Lands Strategy and were in attendance at 6 drop-in sessions. This is considered appropriate level of engagement. Further details of the activities undertaken can be found in the Community Engagement Report.</p> |
| <p>The submitter supports the preservation of much of the rural lands and emphasises that any future development of the rural lands needs to consider traffic, transport and other infrastructure, flood impacts and flood free</p> | <p>Noted. No change to the Rural Lands Strategy.</p> |

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| <p>transport links, segmentation of rural lands, loss of habitats and reduced green areas. Just because people have a landholding in the rural area does not mean that they should be entitled to subdivide based on purely financial arguments.</p> | |
| <p>The submitter also provides comments with specific reference the north-west sector as follows:</p> <ul style="list-style-type: none"> - The talk of future opportunities stemming from the aerotropolis, possible tourism ventures, accommodation, unique agricultural businesses, and mining operations all appear at odds with the idea of preserving the rural lands and maintaining existing stands of vegetation and biodiversity. | <p>Noted. No change to the draft Rural Lands Strategy.</p> <p>The draft Rural Lands Strategy identifies five priorities for rural lands. Not all five priorities will be appropriate on all rural lands. The draft Rural Lands Strategy seeks to identify future opportunities while proposing actions to build on these opportunities and make sure that potential impacts are managed through updated planning controls or similar.</p> |
| <p>Some of the comments in the strategy highlight the lack of local knowledge and understanding by the authors. Comments such as “opportunities for equestrian facilities are avoiding the limited nature of large landholdings and the significant stands of remnant bushland that may need to be impacted”.</p> | <p>Noted. No change to the draft Rural Lands Strategy.</p> <p>The draft Rural Lands Strategy does note that equestrian facilities are an existing land use in the Rural North West precinct and that they may present an opportunity in the future. Potential impacts of new equestrian uses would need to be assessed through the development application process.</p> |
| <p>The comment that “Council will consider enhancing the vegetation along the eastern side of Castlereagh Road to screen quarrying activities” is confusing and better information about the location of proposed quarrying activities should be provided.</p> | <p>The comment relating to screening along Castlereagh Road will be removed.</p> <p>It is not the role of the draft Rural Lands Strategy to provide detailed information in relation to identified mineral resources. Further information can be found from the NSW Government’s Department of Regional NSW.</p> |
| <p>A significant contradiction exists between reducing potential noise and traffic impacts of development on the existing rural residential areas and the suggested land uses. If Council genuinely seeks to preserve the environmental, scenic and agricultural value of the lands in the north west sector than there needs to be restrictions or even prohibitions on the types of land uses mentioned.</p> | <p>Noted. No change to the draft Rural Lands Strategy.</p> <p>The draft Rural Lands Strategy seeks to strike a balance between many, potentially competing, land uses in Penrith City’s rural lands. The draft Strategy includes a number of actions to review and update planning controls in both the LEP and DCP to help manage future development and help meet all five identified priorities in the Strategy.</p> |
| <p>More detail should be provided on how exactly Council will ensure that rental housing (as opposed to owner occupier) is provided and what type of rental housing this will be. When considering additional housing, and particularly housing for an aging population, there needs to be consideration of current infrastructure, public</p> | <p>Noted. No change to the draft Rural Lands Strategy.</p> <p>The draft Rural Lands Strategy suggests that it is appropriate that the rural villages of Londonderry, Wallacia and Mulgoa support greater housing diversity. The draft Strategy also states that this will be further explored</p> |

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| <p>transport links (which are limited now) and services. It is also worth noting Carrington Road Londonderry is impacted by overland flooding, as are other local roads in the area, limiting transport links in extreme weather events and placing a risk to human safety. To recommend an increase residential and commercial activities in these locations does not take into account the suitability of such proposals.</p> | <p>through the development of the Corridors and Centres Strategy that is currently underway.</p> <p>Any future proposal for additional housing would require development consent including a full consideration of potential impacts of the proposal.</p> |
| <p>The map of mineral resources provided is not precise enough nor to an appropriate scale. No property boundaries or local road networks are shown. It is impossible to identify the location of areas planned for mining of resources.</p> | <p>Noted. No change to the draft Rural Lands Strategy.</p> <p>It is not the intention of the map provided in the draft Rural Lands Strategy to exactly identify specific land parcels. Further information in relation to areas identified for mineral resources can be found by contacting the Department of Regional NSW – Mining, Exploration and Geoscience.</p> |
| <p>The commentary relating to mining contradicts earlier commentary about maintaining the character of the area, preserving the scenic values, encouraging tourism, maintaining vegetation and biodiversity.</p> | <p>Noted. No change to the draft Rural Lands Strategy.</p> <p>The draft Rural Lands Strategy seeks to strike a balance between many, potentially competing, land uses in Penrith City’s rural lands. Future development of identified mineral resources would require development consent. This process would consider potential impacts of the proposal and how these impacts could be managed.</p> |
| <p>A waste management facility would be a significantly detrimental proposal for the rural lands in the north-west sector and would have a negative impact on rural residential properties, small businesses, tourism opportunities, environmental quality and amenity of the area.</p> | <p>Noted. No change to the draft Rural Lands Strategy.</p> <p>The draft Rural Lands Strategy does not propose a waste management facility in the Rural North West precinct but notes generally in relation to all of Penrith City’s rural lands that waste management facilities can be operated in conjunction with quarrying activities. Any such proposal would require development consent prior to operation.</p> |
| <p>Following from the above, the strategy goes on to talk about other land use options such as proposed for the Penrith Lakes area like a business park and other “economic development outcomes”. Again, it seems at odds with the priority to preserve open space, natural beauty, cultural connections and protect ecological health and biodiversity.</p> | <p>Noted. No change to the draft Rural Lands Strategy.</p> <p>Planning for the Penrith Lakes site is managed by the NSW Government by a State Environmental Planning Policy. Penrith Lakes has been excluded from the rural lands in the draft Rural Lands Strategy due to the fact that Council does not have control over the outcome on this site.</p> |
| <p>The strategy contains many off-hand remarks and land use suggestions that are at odds with the first three priorities of the strategy, the current character of the area and other</p> | <p>Noted. No change to the draft Rural Lands Strategy.</p> <p>The draft Rural Lands Strategy seeks to strike a balance between many, potentially competing,</p> |

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| <p>comments in the strategy. Council needs to give careful consideration to ensuring that the five priorities of the strategy are met without inadvertently contradicting those priorities through poor rezoning or land use choices.</p> | <p>land uses in Penrith City's rural lands. The draft Strategy includes a number of actions to review and update planning controls in both the LEP and DCP to help manage future development and help meet all five identified priorities in the Strategy.</p> |
| Submission AQ | |
| <p>The submission opposes the proposed zoning for Llandilo and adds a few points to be addressed as follows:</p> <ul style="list-style-type: none"> - Most RU4 rural lots in Berkshire Park and Llandilo are not used for framing purposes as the lots are too small and not financially viable. Berkshire Park residents have waited patiently for urban development to occur so that we can have a local school, neighbourhood centre shops and a post office in our area. There are only a few remaining vacant lots. Most lots have more than one dwelling and the population has increased. - With the land values increasing we will not be able to afford to pay Penrith Council Rate. They are currently around \$5000 per year for 2 ha or 5 acres. They could go up more per year which few landowners could afford. - Discussion in 2005, with the Department of Planning about the development of the Northwest Growth Centres, we expect housing to be expanded into Berkshire Park and Llandilo would include the upgrade of Richmond Road through Berkshire Park. - We want housing developments in Berkshire Park, Llandilo and Londonderry to connect to Richmond and Windsor. - Why is our area been discriminated against, compared to the rest of NSW, why are we being restricted to grow? | <p>Noted. No change to draft Rural Lands Strategy.</p> <p>The draft Rural Lands Strategy considered the evidence available and concluded that further subdivision or urban development will not be supported in the rural lands, including Llandilo, due to:</p> <ul style="list-style-type: none"> • Need to maintain existing agricultural activities operating; • Lack of access to reticulated sewer; • Flooding impacts and limited evacuation capacity; • Significant areas of environmental significance; and • The draft Local Housing Strategy finding that there is enough capacity to deliver necessary housing for the projected population in the existing urban areas and identified urban release areas. <p>Furthermore, the NSW Government has identified Llandilo as being within the MRA in both the Sydney Region Plan and Western City District Plan with an objective to protect and enhance the environmental, social and economic values in rural areas.</p> |