

Comments on the Greater Macarthur Land Release Investigations: Preliminary Strategy & Action Plan, Land Use and Infrastructure Analysis, and Proposed SEPP to amend the Growth Centres SEPP

My concerns with the proposal, as outlined below, are admittedly very lengthy. The extent of my concerns is a direct result of the scant information that the proposal is based upon, and the many special assets which could be compromised if these developments are not undertaken in a responsible manner. The way in which the current growth centres are being planned and presented also strengthens my reservations.

My concerns are:

1. Lack of robust technical information guiding the land release

- a. The Preliminary Strategy (which the SEPP indicates is intended to be a Structure Plan) is based upon very limited technical information. The documents on exhibition assume that it would be appropriate to gather more detailed information at rezoning stage, which is of major concern.

The technical information is generally based upon broad-scale, desktop resources. The Strategy and Structure Plan should be based upon high-quality, robust information to facilitate strategic planning for the land. Further investigations should be undertaken at the earliest possible stage to optimise environmental and social outcomes.

2. Rushed timeframe

- a. The proposed quick timeframe is of concern. For instance, rezoning for 4,900 homes at Mt Gilead and Menangle Park by the end of this year, with construction within 2 years is noted in the Preliminary Strategy. This rushed approach indicates that there is limited scope for addressing legitimate concerns. The proposed timeframes would not allow for the appropriate strategic planning required, resulting in sub-standard outcomes.

What is required for new growth areas of Sydney are well-planned centres that set best practice standards for environmental and social outcomes, not more fast-tracked, dysfunctional suburban sprawl.

3. Inclusion of Wilton as a priority precinct

- a. It is considered that the vast range of constraints associated with the Wilton precinct are dismissed too readily, particularly given the lack of supporting information. The severe infrastructure, and social and environmental constraints are given little consideration. The potentially large conflict with mining is also poorly considered. Specific examples are included throughout my submission regarding my concerns for the plans for this area.
- b. The geographic isolation of the proposed Wilton precinct should be further considered, particularly when determining appropriate housing density levels and required infrastructure. This locality would be expected to always have limited connectivity to surrounding areas due to constraints such as major river corridors, steep slopes and other landscape constraints, and SCA catchment land.
- c. Access to schools and hospitals from this precinct is noted to be limited. There are also very limited cultural and recreation facilities readily accessible. Very few details are provided regarding how these matters will be fixed. It is understood that some details regarding this aspect are included in a draft masterplan for Wilton Junction. However, there appears to be little certainty of the likely outcomes. Further, the Wilton Precinct appears to be much larger than that addressed by the draft masterplan, putting extra strain on these facilities.
- d. Development of this extent should not be contemplated unless it is demonstrated that it will be serviced by a sewer network equipped to deal with it in an effective way.

- e. The community brochure states ‘With careful planning, we can maintain the area’s rural lifestyle and conserve heritage while creating opportunities to build new towns close to transport, infrastructure and services that meet the needs of local communities’. It has not been shown that the Wilton precinct can be developed in accordance with this statement.

4. Lack of protection mechanisms for the assets that make the region special

- a. The documents on exhibition leave it possible for almost ANY land to be developed, so long as it is further assessed. Further, no standards are prescribed for these future assessments. This approach results in the possibility that almost any development footprint would be considered feasible.

Protection mechanisms should be integrated into the proposal at the earliest possible stage (i.e. now) to ensure that the characters and attributes that attract residents and visitors to the area are protected, and to minimise impacts on important natural habitats and assets. Protection should be afforded to assets including, but not limited to, adjacent existing villages and rural land, landscape features, rivers and associated riparian lands, areas that sustain the local biodiversity, heritage items, and agriculturally productive land. In the absence of these protections, I have major legitimate concerns regarding the final outcome of the proposed land release.

As an example of this concern, it appears that the only areas that are definitively not considered appropriate for development on biodiversity grounds are biobanking sites. Whilst the Land Use and Infrastructure Analysis notes that high biodiversity constraint land should not be considered suitable for urban development, this is eroded by the documents indicating that development in these areas would be appropriate if the pathway steps are followed. The biodiversity pathway steps lack the level of detail required to have any certainty in a positive environmental outcome. Further comments on these pathway steps are provided in other points of concern below.

5. Lack of consideration of constraints and values associated with ‘unencumbered land’

- a. Unencumbered land on the suitability maps includes many areas that should be considered constraints. This includes, but is not limited to: State and local heritage items, Hawkesbury Nepean biodiversity corridors, threatened ecological communities, potential threatened species habitat, moderate biodiversity constraint land, and areas affected by longwall mining.

These concerning inclusions to ‘unencumbered land’ are then transferred onto the structure map as ‘developable land’. It is considered that this process has not adequately considered possible constraints to this land. These constraints should be considered upfront in a strategic manner, rather than assuming they can be sorted out at rezoning stage.

Further, the pathway steps do not include measures to ensure that such constraints are appropriately considered, and values are protected or enhanced. For instance, it appears that the biodiversity pathway is not intended to be applicable to unencumbered land.

6. Lack of consideration of constraints and values associated with ‘encumbered land’

- a. There is an apparent assumption that the land identified as encumbered on the suitability maps just requires further assessment or mitigation measures to allow them to be available for development. Adequate protections, assessment standards and outcomes should be prescribed for encumbered land, rather than assuming that it would be appropriate to develop all of it.

7. Excessive yield predictions

- a. The predicted yield calculations would be expected to be very high given the apparent assumption that all unencumbered land and encumbered land would be developable. It is considered that this high prediction risks unreasonably high expectations for final yields. A more conservative yield prediction that takes into consideration the various values and constraints associated with the land would offer a more balanced and appropriate approach. The inflated predictions may lead to perverse outcomes such as increased densities and extent to cater for the perceived yield shortfall.

8. Ecological issues are considered in a simplistic and sometimes flawed manner

- a. It appears that some portions of the accompanying Biodiversity Assessment (Eco Logical Australia 2015) have not been accurately incorporated into the planning documents. It is requested that the following inconsistencies are revised:
 - i. Endangered Ecological Communities and Critically Endangered Ecological Communities are noted in the Biodiversity Assessment as a constraint to development. However, some portions of these communities are identified in suitability maps as 'unencumbered', and noted in structure maps as 'developable land'. All Threatened Ecological Communities should be considered to be constrained land unless further robust field assessment proves otherwise.
 - ii. The Biodiversity Assessment discloses a major limitation associated with the utilised condition assessment. The Assessment notes the importance of field validation for condition assessments, with the possibility of some areas noted to be of low biodiversity constraint actually being of moderate to good condition, or possibly even red flagged. The planning documents should acknowledge this major limitation, and consider the implications of this matter appropriately in the suitability and structure maps. If this limitation is not appropriately taken into account, it would be considered more appropriate to assume that all vegetation is in good condition unless field validation proves otherwise.
 - iii. The summary provided in the Land Use and Infrastructure Analysis of how areas of high biodiversity constraint were determined is not clear. Clarification on whether there should be an 'and' or an 'or' between each dot point should be included. The summary should also recognise that constraints may exist in moderate and low constraint lands, and outline how they will be considered.
 - iv. Portions of the identified Hawkesbury Nepean Biodiversity Corridors are not incorporated into the constrained land on suitability maps.
- b. The following concerns apply to the pathway steps for biodiversity:
 - i. Specific assessment, protection, management and monitoring requirements should be set to ensure ecological values are not compromised at any stage of release and development.
 - ii. Pathway steps for all land suitability categories should be prescribed.
 - iii. Impacts to moderate biodiversity constraint land should also be avoided, unless further assessment indicates that it would be appropriate.
 - iv. Quantitative conservation targets should be included to guide development towards achieving suitable outcomes. These targets should reflect or exceed regional and state biodiversity objectives and targets.
 - v. Other long-term ownership options should be identified (such as Council owned and National Park), and funded.
- c. The following concerns apply to the Biodiversity Assessment:
 - i. No justification is apparent for the use of a 10ha patch size threshold for high biodiversity constraint land. This threshold is considered to be very high. For

context to my concern, the Cth Department of the Environment considers patches of Cumberland Plain Shale Woodland greater than 0.5ha to be important in the national context, and patches of 5ha or larger inherently valuable due to their rarity. In a local or regional context the suitable patch size threshold would be expected to be even smaller than the federal context. Justification for the use of a 10ha threshold should be provided, or the patch size should be reviewed accordingly.

- ii. Land that is not identified as PCL, HN corridor or TEC is assumed to be a low constraint. This approach risks the loss of vegetation and habitat that may be important in sustaining local biodiversity values. A gap analysis of this method should be undertaken to ensure that habitats that support the widest possible range of indigenous species are protected.
- d. Other primary concerns relating to biodiversity issues include:
 - i. The very preliminary approach taken to considering biodiversity matters risks an oversight of many pertinent matters including, but not limited to, lack of consideration of indirect impacts, lack of consideration of land use conflicts, and lack of consideration of habitat types that are sparsely or not vegetated. Neglecting these issues during early stages of the planning process causes a major risk of a poor environmental outcome.
 - ii. No analysis of stand configuration is apparent, resulting in the identification of high constraint land with suboptimal configurations such as narrow fingers and missing 'bites'. Whilst the Land Use and Infrastructure Analysis notes that these edges can be smoothed, it is obvious that this smoothing is intended to be of benefit to the development footprint rather than considering enhancement works to benefit the viability of bushland. Strategic areas beyond the high constraint vegetation which could be enhanced to improve stand configuration should be identified and protected.
 - iii. Biodiversity matters should consider habitat types and values based upon systematic field surveys. This is a fundamental issue that should be determined prior to any release. Many species have very specific requirements, which are not necessarily reflected by broad-scale vegetation mapping. For example, there are many mature paddock trees in the locality which provide valuable hollow resources. It is unknown whether these habitat values are well represented in the area identified as high constraint.
 - iv. It should be clearly stated that prior to offsetting measures being considered appropriate, impacts should be avoided, and appropriate mitigation measures prescribed. Not all impacts can be appropriately offset at rezoning stage, and it should not be assumed to be the appropriate response in all cases.
 - v. The land release should aim for a much higher level of protection, including no net loss of biodiversity values. Aims such as this should be clearly detailed and adhered to.

9. Lack of information on biocertification

- a. It is unclear in the documentation how the current biocertification of the Growth Centre SEPP will be amended, and whether biocertification of the proposed centres will be sought. Further details on this aspect should be provided.
- b. The process followed for biocertification should aim to rectify the issues encountered during the biocertification of previous Growth Centres, which relied upon the introduction of new legislation to put the biodiversity certification order beyond the reach of Court review, and biocertified the SEPP without having to meet the requirements of

the *Threatened Species Conservation Act*. Any future biocertification should not rely upon such legislative changes, and should be required to adhere to the maintain or improve test.

10. Insufficient consideration of ecological corridors

- a. The corridor network has been based upon very broad-scale mapping produced for the Hawkesbury Nepean CMA. This CMA mapping should be treated as a first step of the corridor assessment, not the final product.

The scale of the mapping has led to the lack of consideration of connectivity between local ecological features including Dharawal Nature Reserve, CMA catchment land, Thirlmere Lakes, Razorback Mountains, Mt Annan Botanic Gardens, and the various riparian corridors. All of which are major local assets which could be compromised if not given enough consideration in the early stages of planning. The corridor identification process utilised for the recent OEH BIOMAP or similar would be considered more appropriate for this scale.

The Land Use and Infrastructure Analysis notes that opportunities to enhance corridors can be undertaken during the rezoning processes. This shows a clear lack of understanding of how this matter needs to be considered early in process to accommodate an optimal configuration. All corridor planning should be undertaken prior to release to ensure it is not considered in an ad hoc manner.

- b. In addition to protecting existing corridors, opportunities to enhance corridor connectivity (such as to Mt Annan Botanic Gardens) should be considered. This matter should include due consideration of best practice corridor widths to ensure that the corridors are able to support a wide variety of species.
- c. The locality forms a key strategic area to provide a southern Sydney green belt from the coast to mountains via the catchment area. This connection should be planned for and protected. Therefore this area should be given the appropriate level of forethought to ensure that future opportunities are not compromised.

11. Insufficient consideration of recreation and open space corridors

- a. The Preliminary Strategy notes that potential for new and/or enhanced open space would be investigated as part of future rezoning processes. If left to rezoning stage, the resultant open space network would be a dysfunctional system reduced to 'undevelopable' land, and is likely to cause conflicts with land uses such as environment conservation areas. This matter should be considered for the investigation area in its entirety.

Whilst this area currently gives the appearance of vast open space, much of the land is within CMA catchment land and private ownership. There is relatively limited open space readily available to the public. There is a clear social benefit in planning for an equivalent of Western Sydney Parklands in the Macarthur Region. This opportunity would be lost if considerations are delayed until the rezoning stage.

12. Risk of compromising the significant values associated with the Nepean River and other riparian areas

- a. It is noted in Land Use and Infrastructure Analysis that the urban capable boundary excluded vegetated areas associated with the Georges River. Similar exclusions should be afforded to vegetated areas associated with the Nepean River.
- b. If the area adjacent to the Nepean River is included, appropriate mechanisms should be imbedded within the planning documents to ensure the protection of the vast landscape, biodiversity and recreation potential associated with the River. This needs to be undertaken in a strategic manner to ensure that it is considered in a consistent way and

the different values do not compromise each other (eg undue recreational stresses inflicted on environmental conservation land).

- c. The Land Use and Infrastructure Analysis suggests that riparian corridors of 1st and 2nd streams would be suitable for urban development, and urban development within riparian corridors of 3rd order streams may also be suitable if there are mitigation measures. As a minimum, development adjacent to any order watercourse (including 1st and 2nd order) should be required to adhere to DPI Water guidelines. The apparent ability to not even have to adhere to these minimal standards is of great concern, and suggests that undesirable outcomes are likely to occur.
- d. The pathways steps should prescribe protection measures for riparian areas and required outcomes.
- e. Details should be provided regarding whether any new crossings are proposed for the Nepean River or its major tributaries. These crossings should be required to be kept to a minimum, and be required to adhere to strict best practice methods.

13. Landscape amenity compromised

- a. It is considered that the landscape amenity values, which can admittedly be highly subjective, are underestimated. Diminished values within and adjacent to the release areas should be considered giving due consideration to community values for the landscape. Wilton in particular would form a gateway impression to the Wollondilly and beyond, and is considered critical in the landscape.

14. Primary aim firmly set on yield rather than liveability

- a. The proposal is strongly yield focused, with little to no consideration of aspects which are important to ensure that the release areas are enjoyable places to reside. Factors that should be considered integral to the early planning stage include, but are not limited to: community wellbeing and happiness, adequate green cover, connectivity and permeability of centres, equity, provision of high quality public domains, and social identity. The ability to adequately consider these aspects will be severely compromised if not included in early stage considerations.
- b. It should be clearly demonstrated that the outcome will be a balanced approach, giving due consideration to social and environmental benefits.

15. Proposed density appears to be unsympathetic to surrounding land

- a. No evidence has been provided to show that the relatively high densities proposed are appropriate for these locations. The proposed density is of particular concern for Wilton given its relative isolation, high landscape values and rural setting, limited infrastructure (including the minimal level of improvements proposed) and surrounding land constraints.

16. Minimal (possibly no) government funding proposed for required infrastructure

- a. It is noted that Government is hoping to not fund any of the associated infrastructure. This is of major concern. Reliance on developer contributions via SIC arrangements would cause crippling delays in infrastructure delivery, and would only be expected to meet basic needs rather than optimal needs. These release areas should only be permitted if they are appropriately supported with sufficient government funding for optimal infrastructure needs.
- b. It is noted that even funding for the critical Spring Farm Link Road has not been established (as mentioned in passing within the Land Use and Infrastructure Analysis). This should be considered critical infrastructure for the current rate of development, let alone adding further development to the area. No further land release should be promoted in the locality until this key link is funded and delivered.

- c. Due to cumulative growth already occurring in the region, and many pieces of infrastructure reaching or approaching capacity, key improvements should be delivered prior to further development occurring.

17. Lack of synergy with major infrastructure proposals

- a. There are large infrastructure projects planned for the area which should be duly considered prior to land release to ensure there are minimal future conflicts. The corridor options for the Outer Sydney Orbital and rail network expansions in particular may be impacted upon by, or impact the land release. If the corridor planning for these critical pieces of infrastructure are not at a stage that allows them to be accommodated within the plans, land release in the area should be delayed until further information is determined.
- b. In particular, it appears that the configuration of the land release areas and the proposed Outer Sydney Orbital has the potential for major conflict. Based on early corridor feasibility maps, either the proposed release land, or the land noted in the investigation documents to be important areas to retain as rural would be impacted upon by the road. This conflict needs to be appropriately assessed and mitigated prior to any release within the potential road corridor. We don't need another case like the poorly planned rail corridor through Harrington Park and Oran Park!

18. Lack of commitment to improve the passenger rail network

- a. A feasibility study for the electrification of the existing train line to Menangle Park is noted. This possible extension of the electrified line by a single train station is far from optimal. Electrification of this section should be funded as a minimum. The lack of train services to the proposed Wilton precinct should also be considered when determining the extent of the electrification, and feasibility of releasing the precinct.
- b. Data presented in the NSW Long-term Transport Master Plan indicates that the train line that connects the area to Sydney CBD has one of the highest crowding levels in the entire city network. There has been no solution offered to this problem, or the lack of capacity on this line.

19. Car dependency is promoted for the Wilton precinct

- a. There is a severe lack of public transport options proposed (and possible) for the Wilton precinct. It is currently serviced by an irregular diesel train service (with Maldon being the closest station), and very few bus routes. Based on the exhibited documents, no change to this current state is proposed. Further, due to surrounding constraints, possible future public transport links are very restricted. It is considered that promoting the release of land under these circumstances is irresponsible and in contradiction with pertinent actions in 'A Plan for Growing Sydney'.
- b. The minimal road network upgrades proposed would not cater for this assumed car dependence, particularly given the cumulative rapid growth of areas outside the investigation area. Wider traffic considerations need to be addressed, and growth areas should be restricted to locations that are well serviced with public transport.
- c. Walking and cycling options should also be considered when determining the feasibility of release areas.

20. Increased pressure on commuter corridors

- a. It seems to have been assumed that the limited employment opportunities that may eventuate in the growth area would greatly reduce commuting trips. The lack of opportunities for many professions should be acknowledged and appropriately considered to determine required public transport and road network upgrades. It would be expected that the employment options offered by the growth areas would not substitute many of the opportunities available in CBDs such as the city and Parramatta.

- b. Employment opportunities in closer CBDs such as Liverpool and Campbelltown should also be enhanced, and appropriate transport connections upgraded.
- 21. Perverse impacts flowing into surrounding non-release areas**
 - a. There is an apparent assumption that this extent of development can co-exist with the preservation of the surrounding rural areas and natural assets. It should be demonstrated to the local community that this will be the outcome. With the lack of controls in place, this assumption does not seem to be the likely outcome.
- 22. Lack of consideration and protection for identified heritage items**
 - a. The Land Use and Infrastructure Analysis notes that it is important that the values of the heritage items are conserved. Yet local and state heritage items are shown to be unencumbered land in many cases. Many areas of notable Aboriginal heritage significance (which seem to have been misnumbered in the Land Use and Infrastructure Analysis) are also shown to be unencumbered. These areas should be afforded appropriate protections.
 - b. Appropriate pathway steps, assessment requirements and required outcomes for this important matter should be prescribed.
- 23. Implications for the ability to appropriately offset western Sydney development**
 - a. The investigation area is a key recipient area for biodiversity offsetting actions associated with the impacts caused by the plethora of developments occurring elsewhere on the Cumberland Plain. In its current form, it would be expected that this land release could lead to a shortfall in suitable future offset recipient sites. This is considered a critical consideration, particularly given the major future developments that are likely to require significant amounts of offsetting, including the Western Sydney Airport and associated road upgrades, major employment areas, rail network expansions, and the Outer Sydney Orbital.
- 24. Potential to compromise OEH priority conservation and investment sites**
 - a. The land release should be planned in a manner that ensures that investment and conservation priorities identified by the OEH would not be compromised. For example, sites identified in the OEH BIOMAP should be considered as constrained land.
- 25. Form of the proposed Wilton 'major centre'**
 - a. It appears that the major centre at Wilton is proposed to be large warehouses surrounded by car parking, with the possibility of a freight line through it. This is not the impression given by the draft master plan for Wilton Junction. The form of this centre should be clearly and honestly defined prior to land release at Wilton. The form implied in the exhibited documents would provide employment opportunities for some, but poor social outcomes in every other respect. If it is decided that a centre is needed here, there should be an emphasis on providing a well-integrated, pleasant centre that services the needs of the local community.
- 26. Uncertainty regarding the number and extent of likely rezoning proposals**
 - a. The risks associated with leaving so much information gathering until rezoning stage may be further amplified if there are likely to be many separate rezonings. This would lead to an undesirable piecemeal approach to assessing impacts and formulating appropriate mitigation measures.
- 27. Lack of consideration of sustainability principles**
 - a. Sustainability aspects should be considered as early as possible to ensure that they can be adequately accommodated. Pertinent matters include, but are not limited to: sustainable transport, water efficiency, carbon emissions, climate protection, resource efficiency, energy efficiency, green cover, waste production, WSUD principles.

The current Growth Centres are a very good example of why these aspects should not be delayed until late stages of rezoning or development. It is considered that the sustainability outcome of any future growth areas should far exceed the minimum effort made in the previous growth centres.

As a minimum, pathway steps should be included to prescribe the required standards and assessments that future development would need to adhere to.

28. Lack of detail relating to improvement of health, cultural and education services

- a. Further clarification should be provided for the 'Infrastructure Requirements' tables. Are the schools noted in the education rows new schools? If so, where are they likely to be located? What is proposed for the 'cultural facility'?
- b. The current capacity limits of the local hospitals and schools should be acknowledged, and measures prescribed to cater for the expected increased demand (also taking into account to rapid growth in the area in addition to the proposed land releases).

29. Wellbeing of current community not yet considered

- a. Proper community consultation should be undertaken to give everyone a voice and an opportunity to understand what is proposed. Formal submissions are often daunting, particularly by community members who have little experience with the planning system. Consultation with the community should be undertaken in a manner that allows information to be explained, and feedback provided in a less formal way. Community workshops and information sessions should form part of this approach.

30. Lack of consideration of Wilton forming a gateway impression for the predominantly rural Wollondilly Shire

- a. Driving past warehouses, dense residential areas, and industrial lands to access the rural portions of Wollondilly Shire and beyond has the potential of causing a poor first impression if delivered in an unsympathetic way. Careful planning should occur to ensure that this gateway is an appealing entrance to ensure that visitors want to continue coming to the area.

31. Naïve consideration of risks associated with mining

- a. Impacts related to longwall mining are not restricted to land directly above neat, straight plan lines. Appropriate buffers should be included when determining constrained and encumbered land to consider lateral variations and broader impacts.
- b. The pathway steps relating to mining are reliant upon the honesty and transparency of mining companies, and their full knowledge of future mining impacts. There are vast inherent risks associated with this approach.

As an example, the Douglas Park community have had recent dealings with Illawarra Coal in regards to a power plant they are proposing to construct adjacent to the village. This was claimed to be an unforeseen need for their mine. Similar issues would be expected to impact upon any new development land within future mining areas.

It is therefore considered more appropriate to only consider land releases in mining affected areas once associated impacts have ceased. This is particularly pertinent for Wilton, which is noted to have a 15-30 year timeframe attached to the proposed mining. Obtaining a clear indication of possible conflicts between development and mining in this precinct is unrealistic.

- c. The pathway steps associated with mining should ensure that health standards for the community are a key consideration.
- d. It should be acknowledged that subsidence does not necessarily stop immediately when mining ceases. Long term impacts associated with mining should be considered.

- e. The proposed power plant at Douglas Park should be noted in relevant sections of the documents. Ventilation shafts and other surface structures should also be taken into consideration and noted on pertinent maps.
- 32. Lack of consideration of unintended consequences including land clearing**
 - a. There is concern that a perverse outcome of the land release will be accelerated rates of illegal land clearing to remove the perceived constraints associated with the vegetation. This matter should be appropriately considered and mitigated for at early stages before any damage is done. It should not be assumed that ignoring the matter and expecting the ill-equipped Councils to undertake enforcement actions would be a suitable approach.
- 33. Possible implications for Menangle Park Raceway**
 - a. The viability of Menangle Park Raceway should be considered and protected. Sydney has a long history of forcing such facilities to shut by not considering the surrounding precinct sympathetically. The Raceway and supporting industries and land should be accommodated within the plans for Menangle Park.
- 34. Release of new growth areas appears to be Government's perceived easy option**
 - a. The Government appears to be showing a preference for releasing growth centre after (or concurrently with) growth centre. This approach cannot be considered sustainable or desirable. The suburban sprawl needs to end somewhere.

The many urban renewal projects that continue to be talked about need to be delivered. Greater density, well-serviced hubs along the transport network close to major CBDs need to be delivered. More effort also needs to be put into supporting regional centres, such as Goulburn, to become self-sustained and truly effective centres to help ease the demand on land surrounding Sydney. New growth areas should be considered a last resort, not a choice of convenience.
 - b. Prior to releasing land in this locality, appropriate assistance should be provided to relatively close major centres such as Campbelltown, Liverpool and Mittagong to enable them to become more effective cultural and employment hubs to cater for the growth. Employment opportunities and transport links to centres to the south should be promoted to help ease traffic congestion.
- 35. Apparent disregard for the limitations to the success of the current Growth Centres**
 - a. 'Lessons learnt' from the planning and delivery of existing growth centres should be considered. This exercise should include input from the Office of Environment and Heritage. Any outputs from this analysis should be clearly highlighted in exhibited material to provide the community some degree of confidence that future growth centres will be planned and delivered in an improved manner.

I hope that the matters above will be given due consideration, rather than receiving the standard response of 'to be considered at precinct planning / rezoning stage' or 'beyond scope of considerations'. Any future growth centre release should be treated as an opportunity to achieve good social and environmental outcomes. Sydney doesn't need yet more poorly planned sprawl. People choose to live here for community focused townships, open space, natural assets and a peaceful lifestyle. All these values could be compromised by poorly thought out, unsympathetic development. Please give this proposed release the appropriate degree of forethought that this special area deserves.