



TRIM OUT15/30166

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Dear Mr O'Brien

Draft Macarthur South Preliminary Strategy (Strategy)

The Department of Primary Industries - Agriculture has reviewed the draft documents and provides some specific comment in an attachment to this letter.

The Strategy provides a discussion point for the future of the localities in Macarthur South. There are many aspects that require finer details regarding how the following are to be designed / managed in proposed new urban precincts;

- Management of the interface between urban and continuing agricultural operational land and provision for any transitional arrangements, DPI Agriculture recommends clarifying with agriculture industries their forward plans before rezoning land which may result in land use conflict due to urban encroachment from odorous and noisy agricultural activities.
- Investigate the potential for continuing agriculture and potential for agriculture reuse of urban waste water
- Provide certainty for those areas not planned for release post 2026 to allow for agriculture investment in the interim, i.e. the report discusses land releases which add to speculation.
- Complete the land planning framework for land remaining in the Metropolitan Rural Areas to provide the criteria for local development within these lands.

Thank you for providing the opportunity to comment on the Strategy.

Yours sincerely

Andrew Docking
RESOURCE MANAGEMENT OFFICER

Glenda Briggs
REGIONAL ENGAGEMENT MANAGER – HUNTER / SYDNEY

Attachment A: Comments on the Macarthur South Preliminary Strategy

p2: Protecting Rural Character - 'Up to 2036 these areas will remain rural in nature, with small scale development that can be supported by the existing infrastructure and transport network.', which suggests opens the door to enable widespread local planning proposals for rural residential.

p2: Consideration of Environmental Values and Constraints - the agricultural resource value of land has been considered however subsequently no further discussion. Within the 'Land use and Infrastructure Analysis Report' agriculture is grouped in assessing existing values and constraints with heritage and landscape character rather than with Mineral Resources.

p10: Agriculture resources notes the following process is required to be undertaken where urban development is proposed on land encumbered by agriculture activities:

1. Identify the economic value of agricultural production and employment, noting any significant changes in value and type of production in recent years (for example over two census periods).
2. Estimate the impact of urban development on agricultural production and employment, including impacts on viability of agricultural clusters and costs of, and potential for, relocation.
3. Identify land where ongoing agricultural production could co-exist with urban development, including land with multiple constraints (such as flooding or heritage).
4. Propose a long term land use strategy, based on steps above: a. Noting where the value of agriculture is high enough to warrant protection, or more consideration. b. Identifying measures to overcome adverse impacts, such as buffer zones, relocation of uses, sequencing of land release and replacement of lost employment. c. Consult with councils and NSW Department of Trade and Investment to refine the long-term land use strategy.
5. Communications strategy: a. Prepare strategy to inform landowners and other targeted agricultural industry stakeholders of long-term land use strategy and pathway.

There are no requirements for looking at alternative agriculture investment.

[Land use and Infrastructure Analysis Report](#)

p2 Also mentions Protecting Rural Character

p3 discusses Action 2.4.2 which includes consideration of the sustainability of Sydney's agricultural and resource sectors; and compatibility with adjacent land uses however no mention about the commitment in the Plan for Growing Sydney of the Metropolitan Rural Framework

p4 Indicates that Agriculture, Heritage & Landscape Character were considered as part of assessing Urban Suitability - also reference to 'Co-existence tests' the way this was done is unclear. The document highlights that Biodiversity and Waterways Management are high order exclusions (due to legislative standing) whereas agriculture resource values only a resolvable constraint to be considered on a site specific basis in relation to co-existence options and planning tools.

p5 Funding may also be a constraint – 'The preferred approach to provide infrastructure for housing development is a Special Infrastructure Contribution at no cost to government, otherwise a series of planning agreements would need to be entered into between the Minister for Planning and the relevant proponents.'

p9 Agriculture noted as the top local employment sector in the Greater Macarthur Land Release Investigation Area

p10 Providing local employment is a big challenge – 900 ha of employment land and 50,000 extra people.

p10 The document discusses areas outside the Priority Precincts which confuses the no need for development in these areas until 2026 for example the West Appin study area has no details of how this would proceed or be managed in the interim.

p15 Agriculture information is somewhat dismissive emphasis on amount of agricultural land class 2 and to a 'cluster of poultry sheds', whereas the landscape is capable of production as demonstrated by the large centre pivot irrigation and the relative scale of the Ingham poultry farm. There is no mention of scope for any new agriculture development and the equine facilities and values are not represented.

p16 The notation of Camden Park estate and Belgenny Farm as a state heritage item, however the report does not mention information about the special agri-tourism and heritage values of this particular site.

p 22 Tourism values list various facilities – including Camden Saleyards (with no info on the scale or economic or cultural significance of these). The report also seems to lack any information about the Elizabeth Macarthur Agriculture Institute (EMAI) and its state significance, its employment and research values.

p 31The extent of Employment lands verse proposed housing areas seems very modest, Refers to area available for retain / employment facilities rather than a jobs target. No specific mention of vision regarding encouraging more local employment verses promoting lots of (road based) commuting (other than that most jobs will be in retail and education (proposed new schools). The report mentions proposals for Local Economic Strategies however that creates a piecemeal and narrow focused subject to council resource. Urgently need an overarching agricultural development / food strategy for Sydney region to inform such local strategies. (Glenda Briggs, Regional Engagement Manager).