

4 July 2017

Mr George Koshy  
Director Land Release  
Department of Planning & Environment  
Level 4, 10 Valentine Avenue  
PARRAMATTA NSW 2150

Dear Mr Koshy,

**North West Priority Growth Area - Land Use and Infrastructure Implementation Plan**

Thank you for the opportunity to review and comment on the North West Priority Growth Area Land Use and Infrastructure Implementation Plan (LUIIP) and corresponding draft amendments to *State Environmental Planning Policy (Sydney Region Growth Centres) 2006* (the Growth Centres SEPP) and Development Control Plan (DCP).

Our comments on the LUIIP and draft Growth Centres SEPP and DCP amendments are included as Attachment 1 to this letter.

We support the initiatives behind the LUIIP to ensure that all development can be provided with appropriate services and infrastructure to avoid a mismatch between supply and demand in the future. We also support the key amendment to the Growth Centres SEPP that aims to establish new minimum and maximum residential density controls to assist in managing infrastructure capacity issues in the low density areas.

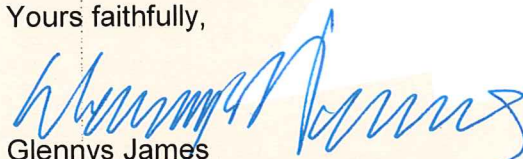
Importantly, we need to ensure that infrastructure planning aligns with development capacity under the planning controls, rather than focusing on minimum densities to project ultimate yield across the precincts.

We do question, however, whether the maximum permitted densities for some of the higher densities areas in close proximity to the town centres and transport nodes are reasonable and appropriate.

We invite representatives from the Department of Planning and Environment to address Council to explain its decisions around densities, particularly in areas where proposed controls do not align with current market expectations and thus landowner expectations of price and yield.

If you would like to discuss this matter further, please contact our Team Leader Release Areas, Fiona McDermott on 9839 6117.

Yours faithfully,



Glennys James  
Director Design and Development

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## **Blacktown City Council submission**

### **Land Use and Infrastructure Implementation Plan Draft State Environmental Planning Policy (Sydney Region Growth Centres) 2006 Development Control Plan**

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#### **1. Land Use and Infrastructure Implementation Plan**

- a. The Land Use and Infrastructure Implementation Plan (LUIIP) aims to guide the ongoing development of the North West Priority Growth Area (NWPGA) over the next 10 years. Our comments on the LUIIP, its key actions and supporting strategies are included below.

##### **1.1 Action 1 – Provide more land supply for new homes**

- a. We support the staged approach to rezoning precincts, but note that supporting infrastructure is more than just utility services (water, sewer, electricity). There needs to be a focus and commitment from government to planning and funding transport and social infrastructure to service the new communities as they move into the area. This is critical to a sustainable development outcome.
- b. The LUIIP estimates an additional 20,000 dwellings across the NWPGA above what was originally planned. It is not clear, however, whether this figure has accounted for the quantum of approved development in precincts that have already been rezoned. The Area 20 and Alex Avenue Precincts, in particular, have been subject to a number of approvals for residential development yielding densities up to 7 times the planned minimum.
- c. We estimate there has already been over 2,000 additional lots approved in the rezoned precincts, representing a significant population that will require infrastructure, services and open space above the allocation that has been planned for.
- d. Marsden Park is identified as the focus for jobs and services for the NWPGA. There should be a greater focus on ensuring that the Town Centre can achieve the intended and desired scale of development to deliver a future District or Strategic Centre to service the needs of the incoming population. In order to achieve this, there needs to be a review of existing planning controls to ensure that they meet the strategic intent for the Town Centre as articulated by the Greater Sydney Commission in the draft West Central District Plan. The centre should be the premier commercial, retail and employment destination in the NWPGA that capitalises on the planned extension of the Sydney Metro Northwest.

##### **1.2 Action 2 – Protect and plan for major transport corridors**

- a. We support the initiatives in the LUIIP to integrate land use and transport planning to provide a multi-modal transport system to cater for the needs of future residents and businesses in the NWPGA.
- b. However, the plan fails to formalise the extension of the Sydney Metro Northwest corridor beyond Marsden Park to link up with other key infrastructure and employment generating



projects in Western Sydney, including its extension to connect with the South West Rail Link via the Western Sydney Airport. The government should formally and financially commit to this corridor as an extension of the Sydney Metro Northwest. The detail of this corridor and mode of transport is vital to our planning for the NWPGA and the future Marsden Park Town Centre as a premier employment area.

- c. We support the review of the Schofields Road corridor as an opportunity to deliver high amenity and accessible transit oriented development. There may be opportunities for increased density along parts of the corridor which should be factored into the overall dwelling count.
- d. The Western Sydney Strategic Model (WSSM) was used to evaluate various road infrastructure projects mentioned in Table 8 of the LUIIP. No details of the transport modelling are provided in the supporting Jacobs transport study to understand how the delivery timing of various road projects is calculated.
- e. It would be worthwhile to undertake further traffic modelling to include the local road network which requires upgrading to support the listed project in the plan. The LUIIP recommends protecting and preserving key regional transport corridors in anticipation of high population, employment and freight growth. The expected growth in the NWPGA further strengthens the case to undertake additional traffic modelling, with the inclusion of the wider road network which requires upgrading to support the implementation of the plan.
- f. The LUIIP is silent on the proposed Castlereagh Freeway (western extension of M7). We strongly support the future investigation corridor providing direct access to the Sydney Business Park and employment zones at Marsden Park, with a full interchange at Palmyra Avenue and Stony Creek Road, Shanes Park. This could also be beneficial and assist in planning for evacuation routes in the case of an extreme flood event across the region.
- g. The following are specific comments on the road projects listed in Table 8 of the Plan:
  - (i) R10 Townson Road and R28 and R29 Burdekin Road overpass should be delivered at the same time.
  - (ii) R23 Wallace Road deviation should be done as part of the R13 Bandon Road upgrade by RMS.
  - (iii) R14 Garfield Road is a State road that should be delivered by RMS for its full length. The LUIIP should also clearly state the RMS' position on the location, design and timing for the replacement crossing of the Richmond Railway Line along Garfield Road. The businesses and community in Riverstone need certainty in order to plan for their future.
  - (iv) R20 South Street West should be delivered by RMS as an extension of a major arterial road (Schofields Road) that provides a link to the future motorway.
  - (v) R21 Daniels Road Bus Only Link – timing for this needs to be provided in the plan. This project should include the upgrade of an unformed section of Daniels Road between Luxford Road and the road reservation for the proposed Castlereagh Freeway.
  - (vi) R23 Wallace Road deviation should be done as part of Bandon Road.
  - (vii) R25 Loftus Street – timing for this needs to be provided in the plan.
  - (viii) R26 Veron Road – timing for this needs to be provided in the plan.
- h. The acquisition obligations should be aligned with the proposed delivery agency. With the current list, there are instances where council is nominated as the delivery agency but RMS is the acquisition authority and vice versa.



### 1.3 Action 3 – Manage residential densities to align with infrastructure

- a. We support the initiative to ensure that density occurs in a logical manner in areas that are best suited to accommodate it and at a level that is commensurate with infrastructure provision. However, the detail of the proposed density caps requires further consideration, to ensure that the densities are appropriate to market conditions and make the most of government investment in major infrastructure projects like the Sydney Metro Northwest. Some of the proposed upper density limits in areas around town centres and transport nodes appear to be conservative, particularly in the context of existing approved developments in some areas. Furthermore, Schofields has recently been announced as a Priority Precinct highlighting its potential to provide housing to the market.
- b. There is also concern that supporting controls in the SEPP are not proposed to change to reflect the density caps. For example, height of buildings and FSR controls do not align with the revised density bands and will likely create unrealistic expectations for developers and prove problematic for development assessment. We would support a review of the density controls, along with corresponding built form controls, around transit oriented centres such as Cudgegong Road, Schofields and Marsden Park.
- c. There is a large demand for dwellings in the NWPGA, and in particular in centres and locations proximate to the Sydney Metro Northwest, as this is where council and the State Government have committed significant resources. It appears counter-intuitive to significantly restrict the amount of development when there is a strong demand in appropriate locations. We would support additional master planning work to occur for the higher density zones and town centres, to reconcile the expected population with the provision of infrastructure, services and open space.
- d. **Our recommendations:**
  - (i) There are essentially 3 'categories' of residential land in the NWPGA. The proposed amendment to the SEPP attempts to apply a blanket approach to density control across all 3 categories. This is reactive planning that responds to an existing level of infrastructure provision. It does not represent best practice in strategic planning and is counter-intuitive to government policy around housing affordability (growth in supply). Precinct planning and infrastructure provision in the NWPGA should be based on an understanding of the ultimate capacity of land under a suite of planning controls that delivers good urban outcomes. This figure (yield) should be used to determine infrastructure planning.
  - (ii) Low density R2 zoned land
    - We recognise the need for the density cap in the low density residential areas, and in particular for land below the PMF where flood evacuation is problematic. The proposed caps appear to be consistent with the upper/average density that we are seeing in subdivision developments throughout the R2 zones.
  - (iii) 'Out-of-centre' medium density R3 zoned land (amenity areas proximate to open space, road corridors, local centres etc.)
    - We accept the immediate need for the density cap on these areas as an interim 'holding' provision until infrastructure planning and provision is matched with the actual need/demand that would be generated by the ultimate capacity of the land based on the existing planning controls (ie. height of buildings, FSR etc.).
    - The key actions and supporting strategies that underpin the LUIIP go some of the way to addressing the infrastructure shortfall, but they appear to be based on



reconciling the gap between the existing planned provision and the proposed upper density cap only. We argue that infrastructure should be planned to address the need generated by the ultimate development of the NWPGA based on capacity afforded under existing planning controls.

(iv) Transit-oriented/centre based medium-high density R3 zoned land

- The density cap should not apply to residential zoned land within 800 m of the Rouse Hill, Cudgegong Road, Schofields and Marsden Park town centres. These areas are key transport nodes and should be the focus of increased density across the NWPGA to not only offset the cap in the low density areas, but to capitalise on the significant investment in transport and other infrastructure in these centres. Development in these key areas should be managed through a combination of appropriate built form controls, with building height being the limiting factor.
- The 'removal' or absence of a density cap in these areas should be supported by detailed planning to deliver an appropriate framework against which we can assess future development proposals. That planning framework should then determine ultimate dwelling capacity by which infrastructure should be planned. This approach is consistent with the government's recent announcement of Schofields as a Priority Precinct with a focus on housing provision. Marsden Park is identified in the draft District Plan as a higher order centre with opportunities for housing and jobs growth. We are about to commence a project in collaboration with the Greater Sydney Commission to review the planning controls that underpin the Marsden Park Town Centre.

#### **1.4 Action 4 – Protect assets and plan for evacuation**

- a. We appreciate the need to address evacuation of the NWPGA in the event of an extreme flood event. At the same time, however, planning for the area should deliver infrastructure improvements that address the issue and available land for urban development. Curtailing densities and limiting development below the PMF could be offset by increased densities in the areas that are suited to development.
- b. Implementation of local drainage, road and open space infrastructure would be simplified and streamlined if all land required for local infrastructure was biodiversity certified. Currently, significant infrastructure items such as drainage basins, that are required and zoned to service the development, are on non-certified land which adds cost and time to the approval and delivery of the local infrastructure. Streamlining of the heritage approvals, particularly AHIPs, would also assist in the delivery of local infrastructure.
- c. As part of overall infrastructure implementation, coordination between utility and road authorities is required to ensure trunk utility services don't conflict with local transport, stormwater and community facilities, and minimise disruption to local residents by conducting works concurrently where possible.
- d. The following are specific comments on the Cardno Water Management, Flood Modelling and Riparian Corridor study:
  - (i) The Cardno study only considers the West Schofields and Shanes Park Precincts. The riparian assessment for the Riverstone and Alex Avenue precincts should be updated to suit the current guidelines for consistency. The proposed offsetting in the Shanes Park Precinct may be problematic. There should be no offsetting for consistency unless there are benefits to orderly development of the precinct.
  - (ii) The report should reference current SES Flood Plans for the Hawkesbury-Nepean system and associated infrastructure and evacuation requirements.



- (iii) The proposed water cycle management strategy should be consistent with previous precincts – ie. no OSD for development and full on-lot treatment for land uses other than low density residential. An overall review of detention across the NWGC is feasible and council is working on this study at present.
- (iv) Section 3.6.3 Cumulative impacts and regional flood assessment – a reduced basin strategy is feasible as the NWGC is subject to Hawkesbury backwater and is at the downstream end of local creeks. The reference to the Riverstone Precinct on p25 should be Riverstone West Precinct, as no cut and fill strategy was done for the Riverstone Precinct.

### **1.5 Action 5 – Transfer more planning controls back to local councils**

- a. We support the move by the Department of Planning and Environment to progressively transfer planning controls from the Growth Centres SEPP to local environmental plans.

### **1.6 Action 6 – Simplify planning controls within the Blacktown Precincts in the North West Priority Growth Area**

- a. Development in the Blacktown portion of the NWPGA is controlled under 6 separate precinct plans. We support the initiative of the LUIMP that proposes to consolidate these into a single precinct plan, to improve consistency of controls and ease of interpretation, and to facilitate transition of the Growth Centre SEPP controls into the Blacktown Local Environmental Plan.

### **1.7 Action 7 – Review infrastructure requirements and accelerate funding for capital works**

- a. The LUIMP recognises that increased densities will lead to higher than previously anticipated population growth, and that additional infrastructure to support the population will need additional funding. It is likely therefore that contribution rates will increase as a result of this plan.
- b. While the LUIMP discusses the need for community facilities to service the population, it ignores Government policy which precludes us levying Section 94 contributions for community facilities buildings. Our liability is \$274 million worth of unfunded community facilities across our NWPGA precincts.

### **1.8 Action 8 – Improve pedestrian, cycle and green connectivity**

- a. We support the Department's work to plan for improved pedestrian and cycle connectivity to key destinations within the NWPGA, including implementation of the Green Grid as outlined in the draft West Central District Plan. In particular, we encourage the government, through the Western Sydney Parklands Trust, to take ownership and management of the Eastern Creek corridor as an extension of the parklands existing corridor.
- b. We don't believe that a collection of shared footways on the edge of SIC funded major roads is a sensible cycleways plan. We need to make sure that cycleway networks are connected to local centres, major recreation destinations and corridors along creek lines. This should in part be delivered by the Green Grid.
- c. The following are specific comments on the GHD Open Space Audit:
  - (i) Table 2 of the Study is a summary of the number of double playing fields. The distribution rationale appears to discredit the benchmark of 2.83 ha/1000 people because it is not based on location factors. If the 2.83 ha/1000 people standard is

applied, approximately 343 ha of additional open space would be needed across the NWPGA (including precincts in The Hills LGA).

- (ii) The Audit places greater emphasis on location rather than quantity as the main indicator for open space needs. Whilst location is important for accessibility to open space, quantum of provision is even more important to ensure that the future population has adequate provision levels. The use of a quantifiable standard is important in ensuring transparency and accountability in open space delivery.
- (iii) The GHD Draft Social Infrastructure Guidelines has not been endorsed by council or the DPE. It is not being used in precinct planning in the NWPGA. It should not be introduced as a benchmark in such a crucial document until it has been thoroughly examined by council and, if warranted, endorsed by council and the DPE.
- (iv) One of the recommendations for the Area 20 Precinct and Riverstone Precinct includes the use of riparian corridors for active and passive open space. None of our precinct planning work to date has accepted this approach to open space provision. It has been the approach in the NWPGA to preserve and protect the riparian corridors, but not to quantify them as meeting open space demand. Alternative suitable open space land needs to be found to meet the need.
- (v) We do not accept the recommendation that Rouse Hill Regional Park be utilised as a way of providing for the shortfall in local open space in the Area 20 Precinct. This is a regional park containing a regional facility and should not be seen as a means to justify the lack of local open space to support development.
- (vi) The recommendation to use land adjacent to the Sydney Metro Northwest should be approached with care and on a case by case basis. There is the potential for anti-social behaviour on land adjacent to railway corridors.

## **2. Draft amendment to State Environmental Planning Policy (Sydney Region Growth Centres) 2006**

- a. It will be useful to have some guidance on how the range of development standards in the SEPP will work together, particularly when building heights, FSR, lot size and density ranges do not align. The clause should state that the lower limiting control prevails over any inconsistency between controls.
- b. The drafting of the controls should ensure that there are no exceptions to compliance with the density caps, such as the existing clauses relating to exceptions to minimum lot size controls. You need to consider possible 'loopholes' by those seeking to create greater density, such as subdivision of larger residue lots, dual occupancy or manor homes.
- c. The Explanation of Intended Effect is also silent on the minimum lot size for secondary dwellings or studio dwellings, yet proposes to increase the minimum lot size for a dual occupancy in the R2 Low Density Residential zone to 600 sqm, which is still not sufficient for 2 dwellings under a density cap of 25 dwg/ha.
- d. Some examples for consideration are outlined below:

### **Example 1**

- Zone: R2 Low Density Residential
- Density: 15-25 dwg/ha
- Site area: 5 ha



- (i) Using the exceptions clauses and integrated subdivision DA pathway, a number of residential lots of 250 sqm could potentially be created. A 5 ha site permits a maximum of 125 dwellings.
- (ii) If the full 5 ha is counted in the calculation of density, a DA can potentially be lodged for 124 residential lots ranging in size from 250 sqm to 500 sqm and one lot of 1 ha, totalling 125 lots which is the maximum permitted density. The 1 ha lot could be further subdivided for a further 25 lots, resulting in an overall density that exceeds the maximum cap.
- (iii) If the 1 ha residue lot is not counted in the site area for the purposes of calculating residential density, this would reduce the site area to 4 ha with a maximum density of 100 dwellings. The number of permitted dwellings on the 1 ha lot will be calculated when the lot is subdivided at a future date. The drafting of the controls needs to take this into consideration.

### **Example 2**

- Zone: R3 Medium Density Residential
  - Density: 25-35 dwg/ha
- (i) If a manor home is proposed the minimum lot size will need to be 1,142 sqm, but no greater than 1,600 sqm, to permit 4 dwellings on the lot. The minimum lot size for a manor home specified in Clause 4.1AB is 600 sqm. There is no correlation between minimum lot size for a manor home and the density ranges.

## **1.1 Floor space ratios**

- a. The current FSR limits are generally unrealistic in the NWPGA as they are generally significantly greater than can be achieved within the specified height limits. This creates friction and misunderstanding and therefore process delays.
- b. We strongly support removing the FSR control altogether for residential zoned land and instead rely simply on the height limits. This will further reduce the pressure on increasing densities to realistic and more compatible levels. FSR controls bulk and scale. Height and setbacks combined perform a similar function. To have both FSR and setback and height controls is a duplication of controls.
- c. The removal of FSRs will make it consistent with Blacktown Local Environmental Plan 2015 and easier when the Growth Centres SEPP controls are transitioned into the LEP.

## **1.2 Mapping inconsistencies**

### **a. North West Priority Growth Area – Land Use and Infrastructure Implementation Plan**

- (i) Figure 14 on pages 30-31 shows the Riverstone Town Centre on the southern side of Garfield Road East. The actual location is on the northern side of Garfield Road East.

### **b. Dwelling Densities Map**

- (i) The proposed dwelling density range for land in the vicinity of Clydesdale House is 11. The map and corresponding SEPP provision should be clear that this is a maximum density, not a minimum.



- (ii) There are various other inconsistencies in the mapping where the zoning and land below and above the PMF does not align with the densities as expressed in the table on page 9 of the Explanation of Intended Effect (EIE). Some of these details are outlined below:
- The table on page 9 of the EIE does not include the density band of 15-20 (dwg/ha) that is shown on the map titled Proposed Residential Density Ranges. It is presumed that this density range applies to land zoned R2 below the PMF.
  - The proposed density map shows the density range of 15-25 (dwg/ha) on land zoned R3 Medium Density Residential on the Proposed Land Zoning map, which is also below the PMF. This is inconsistent with the statements in the EIE.
  - There is also no density range on the map or in the EIE for R3 Medium Density Residential zoned land below the PMF, yet there are locations where this occurs. Should there be a density range of 25-30 (dwg/ha) for R3 zoned land below the PMF?
  - The EIE also does not explain the density range 35-55 (dwg/ha) that is shown on the density map.
- (iii) Notated maps are included as an appendix to highlight some examples of where these inconsistencies occur.

**c. Lot Size Map**

- (i) The Key on the Proposed Minimum Lot Sizes map shows  $M = 6,000 \text{ m}^2$ . This should be corrected to show  $M = 600 \text{ m}^2$ .
- (ii) The land, north and south of Macquarie Road and on the western side of Cudgegong Road, is zoned RE1 Public Recreation. The Proposed Minimum Lot Sizes map shows a lot size of  $2000 \text{ m}^2$  applying to this land. Land zoned RE1 should not have a lot size requirement. It should be removed to be consistent with other RE1 land.

**d. Land Zoning Map**

- (i) The zoning map does not show any current special provisions hatching (A-N) over the lands where they currently apply now. The zoning map should be amended to reflect this so that it does not delete current controls over the land.

**e. Land to which the Precinct Plan applies**

- (i) The EIE excludes reference to the Riverstone East Precinct. The EIE needs to be corrected to state that the Precinct Plan applies to part of the Riverstone East Precinct.

### **1.3 Lot Sizes**

- a. The proposed lot size for multi dwelling housing is  $1500 \text{ m}^2$  for R2 Low Density Residential zoned land. There is no proposed minimum lot size for R3 Medium Density Residential zoned land, yet it is a permissible use. This needs to be corrected.
- b. The minimum lot size for multi dwelling housing in the R3 zone in the Blacktown LEP 2015 is  $1800 \text{ m}^2$ . Consideration should be given to increasing the minimum lot size in the Growth Centres SEPP from  $1500 \text{ m}^2$  to  $1800 \text{ m}^2$  on land zoned R2 and R3 so that it is consistent with Blacktown LEP 2015.
- c. The proposed minimum lot size controls for residential flat buildings is  $1500 \text{ m}^2$  in the R3 Medium Density Residential zone. In the current Lot Size Map there are two controls of  $2000 \text{ m}^2$  for a minimum density of 25 dwg/ha and  $1000 \text{ m}^2$  for a minimum density of 45 dwg/ha. The higher amount of  $2000 \text{ m}^2$  should be adopted instead of  $1500 \text{ m}^2$ , particularly

when applied to sites at 45 dwg/ha where there is a need for additional land for landscaping, parking, bins and the like associated with more intense development.

#### **1.4 Land Use Tables**

- a. We support the consolidation of the various precinct plans into one precinct plan for the Blacktown portion of the NWPGA. We also support the longer term action of incorporating the Growth Centres SEPP provisions into Blacktown LEP 2015. However, the proposed consolidated land use tables are inconsistent with the land use tables in Blacktown LEP 2015. This will need to be reconciled when the Growth Centres SEPP provisions are merged with Blacktown LEP 2015.

### **3. Draft amendment to Blacktown City Council Growth Centre Precincts Development Control Plan**

- a. On page 8 in the Amending DCP, 3.1.3 Battle axe lots, Control 3, Blacktown Growth Centres Density Map does includes a provision for a density of 10 dwg/ha. Blacktown Council does not have a density of 10. It should be removed otherwise it will lead to confusion.

### **4. Existing Planning Proposals**

- a. We are considering a number of Planning Proposals for land in the NWPGA that are in various stages in the process. These proposals need to be considered in finalising the proposed amendments to the Growth Centres SEPP. Of particular relevance are the following Planning Proposals that have been adopted by Council and been forwarded to the Department of Planning and Environment to request that the plans be made:

- (i) **Elara Estate on Richmond Road at Marsden Park**

Involves various changes to land use zones in Stockland's Elara Estate.

- (ii) **Nirimba Education Precinct**

Involves the rezoning of land from SP2 Infrastructure (Educational Establishment) to R2 Low Density Residential on Lot 2, DP 853847 in the south-western corner of the Nirimba Education Precinct

- (iii) **Neighbourhood shops in the Marsden Park Industrial Precinct**

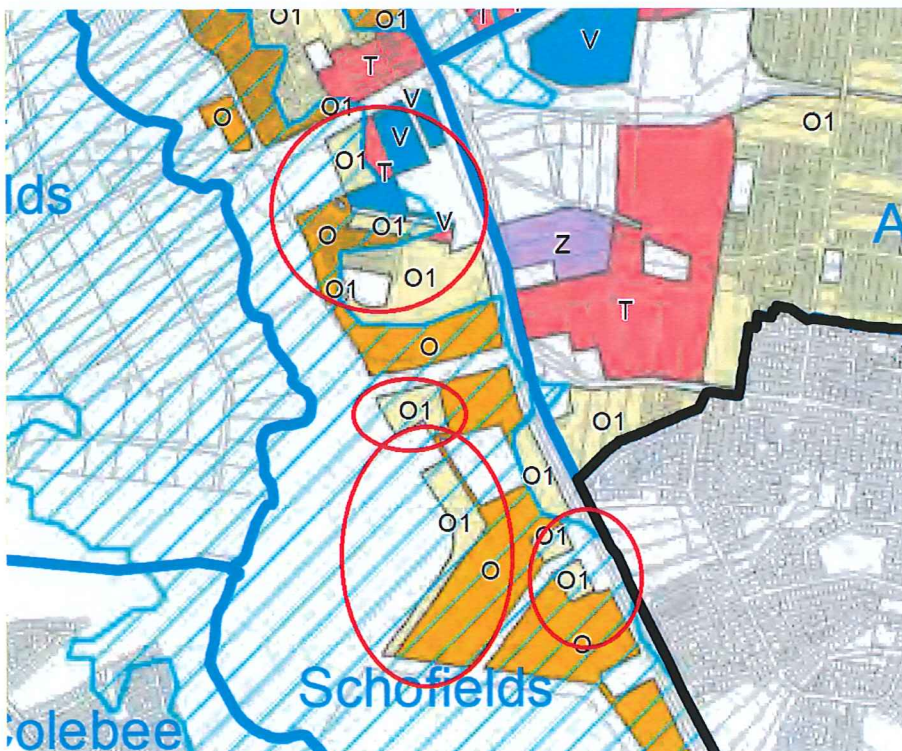
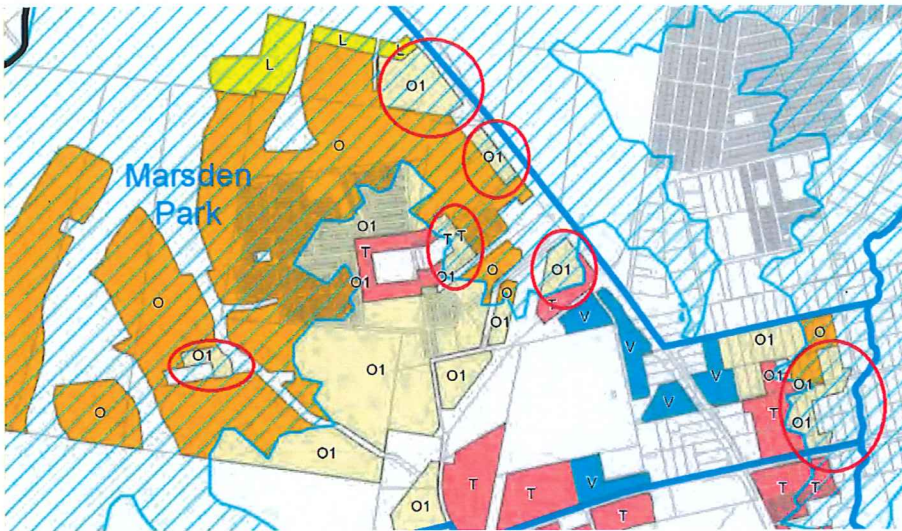
Council resolved to reduce the maximum gross floor area of neighbourhood shops from 1,000 sqm to 500 sqm, and limit the total gross floor area of neighbourhood shops to 3,500sqm for the IN1 General Industrial and IN2 Light Industrial combined zones in the Marsden Park Industrial Precinct. The exhibited EIE proposes to change the maximum retail floor space from 1,000 sqm to 100 sqm. This would be inconsistent with the outcome of the Planning Proposal.

- (iv) **Brighton and Bligh Streets, Riverstone**

Involves the rezoning of land from SP2 Infrastructure (Drainage) to R2 Low Density Residential and changes to the ILP. Council resolved to adopt the final plan at its Ordinary Meeting on 28 June 2017. The plan will soon be forwarded to the Department to request that it be made.



**Examples of inconsistencies between the Proposed Residential Density Map and statements in the Explanation of Intended Effect**



## Marsden Park Industrial Precinct

