

22 March 2022

Paulina Wythes

Director, Planning Legislative Reform
Department of Planning & Environment
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RE: A New Approach to Rezoning Discussion Paper

Thank you for seeking Sydney Water's input on A New Approach to Rezoning, a discussion paper which proposes reforms to the planning proposal process concurrent with the introduction of the new LEP Making Guideline. Sydney Water has reviewed the paper and been briefed by the Department regarding it. In light of this, we can provide the following comments for your consideration.

Pre-Lodgement Stage

Sydney Water notes the additional emphasis proposed to be placed upon the new pre-lodgement stage of the planning proposal process. We have been working with Elise Cramer's team to ensure that we get the necessary referrals and data at pre-lodgement. While we are supportive of this pre-lodgement scoping stage, Sydney Water does have reservations about the pre-lodgement process being via email rather than the Portal and that initial early examples to date have not provided Sydney Water with the key growth data that we require to enable us to provide robust servicing advice in a timely manner nor indeed have they been sent consistently via the portal or to the appropriate mailbox.

Sydney Water therefore recommends that all enquiries are via the Portal to enable a true end to end review and assessment continuity and traceability. As a fallback, where routing via the Portal is not possible, referrals should always be directed to the UrbanGrowth mailbox. Furthermore, we request a detailed process to reject or stop the clock where the data provided is inadequate for our requirements or where it has come via an indirect route which impacts our response times.

Growth Data

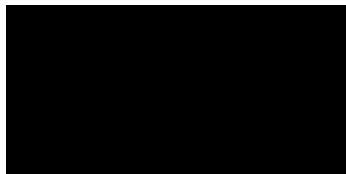
In 2021 Sydney Water approached over twenty councils as part of its programme to engage and educate on why Sydney Water requires both referrals and growth intelligence. From our discussions with council staff, councils acknowledge that early indication of growth numbers and timescales are critical to enabling Sydney Water to plan adequately and efficiently for amplification, uplift, or new services. Provision of ultimate and annual growth data also enables Sydney Water to better assess a planning referral such as a rezoning to ascertain whether we can service initial stages whilst larger capital projects are being planned for and undertaken rather than provide a blanket "no" response to the ultimate growth figure. However, councils explained that they are often reticent or lack the resources to provide growth assumptions and timescales for these planning proposals / rezonings, especially at

an early stage. As a result, translating incoming information into meaningful growth data may present challenges.

Sydney Water therefore recommends that the Department take an overarching responsibility to produce and publish bi-annually (as a minimum) a “single source of truth” growth forecast for all proposed growth precincts which includes all council-led precincts and provides the ultimate and annual staging anticipated. Sydney Water acknowledges that this data may change, but we require this information to assess impact on current and future assets and provide meaningful referral responses.

Sydney Water is happy to meet with the Department to explain our planning and funding processes and how robust growth intelligence is integral to enabling us to plan for services whilst meeting our regulatory requirements. Attachment 1 provides the details of how Sydney Water would prefer incoming growth data to be formatted and provided as part of every rezoning application. If you require any further information, please contact Thomas Mudgway, Senior Development Consultant in the Growth Planning team, via [REDACTED].

Yours sincerely,



Kristine Leitch

Commercial Growth Manager

City Growth and Development, Business Development Group

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Attachment 1

Growth Data Information

This data collected will inform Sydney Water's planning investigations for servicing the proposed development and wider area. Ideally, updates should be provided every quarter for each development. Development intel helps to ascertain demonstrated demand and development confidence which supports business cases, planning studies, and commercial opportunities. The data collected will be treated as commercial in confidence. It is understood that the data may be indicative only at this stage.

	Ultimate Growth	Ultimate EP (if known)	Number of Stages
Single dwellings			
Multi dwellings			
Jobs			

	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030
Single dwellings										
Multi dwellings										
Jobs Numbers										
OR: Jobs in GFA										

High water users

Insert details on any proposed high demand water users (data centres, food production etc)