

Contact: Ms Harkirat Singh

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25 March 2022

Ms Paulina Wythes
Director
Planning Legislative Reform

Via: NSW Planning Portal

Dear Ms Wythes

Georges River Council Officer's Submission – *A new approach to rezonings* - discussion paper

Thank you for the opportunity to provide feedback on *A new approach to rezonings* - discussion paper (Rezonings Discussion Paper).

Georges River Council officers welcome the Rezonings Discussion Paper and its aim to support a stronger strategic planning process that aims to significantly reduce the time, cost and complexity of the process by:

- creating a streamlined process for local environmental plan (LEP) amendments, setting clear matters for consideration, timeframes and a fee regime,
- having councils receive and determine private proponent initiated LEP amendments, with minimal Department involvement,
- increasing the role of the Department in supporting and assisting councils in the process,
- requiring LEP amendments to go through a mandatory upfront pre-lodgement process, moving all merit assessment processes to after exhibition; and
- providing private proponents a right of appeal against the final decision.

In our review of the Discussion Paper, Council officers have identified a number of areas that would benefit from further consideration and clarification. These areas include General comments, the Rezoning Application Process, the Fee structure and Appeals Body and are provided in the attached Council Officer's Submission.

Council Officers concerns in relation to each of the proposed stages of the new rezoning application process are summarised as follows:

Scoping

- Insufficient time allocated for undertaking the Scoping stage tasks.
- Exclusion of negotiation, assessment, and preparation of a Voluntary Planning Agreement (VPA) or consideration of an amendment to a Contributions Plan prior to exhibition.
- Scoping timeframes not included in the overall timeframes.

Lodgement

- Inadequate timeframes allocated that do not take into consideration:
 - The review and endorsement of documentation submitted by the proponent.
 - Preparation of pre-exhibition tasks like newspaper ads and letters.
 - The submission of documentation for any amendments to the Contributions Plan and VPA offer where required.

Appeal

- The only opportunity to refuse a rezoning application if it lacks strategic merit is in the final assessment stage and proponents will only have a chance to appeal at this stage.
- Unreasonable timeframes for deemed refusal periods.

Exhibition

- Lack of consideration of preparing exhibition material in the Exhibition timeframe.
- Unclear if the VPA offer and any amendment to the Contribution Plans should be exhibited concurrently with the rezoning application.

Post Exhibition and Assessment and Finalisation

- The need for Council to review the submissions received and responses provided by the proponent to determine whether issues raised have been addressed.
- Issues related with placing the onus of assessing inconsistencies with a section 9.1 direction on councils.

In response to the concerns raised above, Council officers have suggested three alternative staging and timeframe approaches with one representing a rezoning framework without a VPA, one with a VPA and one where the determining body is the Local Planning Panel. These approaches are embedded within the attached Submission.



Where there is no comment, it can be assumed that Council officers have no substantial concerns with what is being proposed and can be taken as general support.

If you require any further explanation of the issues raised in the submission, please do not hesitate to contact Harkirat Singh, Senior Strategic Planner on [REDACTED].

Yours faithfully

[REDACTED]

Meryl Bishop
Director Environment and Planning



Georges River Council Officer's Submission

A new approach to rezonings - discussion paper (Rezoning Discussion Paper)

This submission has been structured under the following categories:

1. General comments
2. Rezoning application process
3. Fees
4. Appeals body

Comments are provided supporting or raising concerns on the above aspects of the draft Rezoning Discussion Paper. In response to the issues raised on the Rezoning Application Process, Council has prepared two alternative staging and timeframe approaches for the Department of Planning and Environment (DPE) to consider in the finalisation of the draft Rezoning Discussion Paper.

1. General comments

1. Proposal – new terminology

Comment

Council officers support the proposed terminology for 'proponent' and 'rezoning authority' which reduces confusion of terms and roles and responsibilities. However, concern is raised with the term 'rezoning application' as it implies an application to change the land zone for a land parcel and does not seem to include changes to development standards, heritage items, reclassification applications and the like.

It is recommended that these be termed as applications to amend a local planning instrument.

2. Proposal – owners' consent

Comment

Council officers support private proponents lodging rezoning applications only if they are the owner of the land or have obtained the consent of the landowner to which the

Georges River Civic Centre Corner MacMahon and Dora Streets, Hurstville

Clive James Library and Service Centre Kogarah Town Square, Belgrave Street, Kogarah

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application relates. The lodgement of rezoning applications by private proponents without owners' consent results in uncertainty as to whether all sites proposed for rezoning will progress to the development application (DA) stage and be developed. This is of particular concern on larger master planned sites that rely on certain lots to provide open space or community facilities or access to the site.

3. Proposal – categories of rezoning applications

Comment

Council officers support the standardised categorisation of rezoning applications to provide certainty to proponents, the community and rezoning authorities on timeframes, information and public exhibition requirements, and fees.

Many councils already categorise rezoning applications, including Georges River Council which categorises proposals as follows:

- Minor - Planning Proposal with no map change i.e., no zone, FSR or height change;
- Major non-Complex - Outside Kogarah & Hurstville CBD's; and
- Major CBD or Complex - within Kogarah & Hurstville CBD's i.e., zoned B3, B4 or deferred matter.

4. Proposal – roles of stakeholders in the rezoning process

Comment

Council officers support making private proponents more accountable in the rezoning process and the attempt to reduce the workload of council staff, particularly in consulting with State agencies, and addressing submissions. Giving councils greater autonomy and ensuring they still have a significant role is also supported. However, in providing greater responsibility to private proponents, councils still need to oversee the tasks undertaken by proponents to ensure that proposals are thoroughly assessed and all issues have been addressed, including those raised by State agencies and the community. Accordingly, councils need to be afforded sufficient resources, including staff and budget, to process rezoning applications. Councils also need support from the DPE to ensure issues are addressed early in the process and constructive feedback is received from State agencies in a timely manner.

5. Proposal – public authority applications

Comment

Concern is raised that local issues will not be adequately considered, nor will local interests be represented if the power of assessing public authority led rezoning applications are removed from councils and instead determined by the DPE. These applications have issues similar in nature to the ones driven by private proponents.

Furthermore, it is also unclear how these public-authority led rezoning applications assessed and determined by the DPE will enable councils to enter Voluntary Planning Agreements (VPAs) or propose amendments to Contributions Plan with the proponent.

Accordingly, it is recommended that public-authority initiated applications be assessed by councils rather than the DPE, similar to private proponent-initiated applications.

2. Rezoning application process

Council has reviewed the proposed staging and timeframes in the rezoning application process and raise concerns. The concerns raised are provided under each of the relevant stages below.

- **Scoping**

Comment

The initial work undertaken as part of the mandatory Scoping stage (including assessment of site specific and strategic merit, agency feedback and other mandatory information to be submitted by the proponent) is considered beneficial and an improvement to the rezoning process. Council needs to ensure that the information submitted is correct and comprehensive. The stage provides an opportunity for councils to undertake assessment and request additional information if required.

However, concern is raised that there is no mention of the VPA and Contributions Plan process in this stage or any stage within the new rezoning approach. The discussion paper does not reflect the Infrastructure Reforms and the proposed Direction which requires that contributions plans are required with planning proposals. The rezoning process should not be considered in isolation from the VPA and Contributions Plan process. It is essential that the demand and supply of public infrastructure and facilities resulting from a rezoning application are considered in the rezoning process.

Furthermore, insufficient time or allowance is provided during the Scoping stage for the negotiation, assessment, and preparation of a VPA or consideration of an amendment to a Contributions Plan prior to exhibition.

Concern is also raised that the timeframes quoted in the draft Rezoning Discussion Paper have not included the timeframes for the Scoping stage work. It is unclear why this stage has not been included as this is the most important stage in the rezoning process and takes the most amount of time.

- **Lodgement**

Comment

Concern is raised with the lodgement timeframe of one week, which is considered highly inadequate to review whether the guidance provided in council's written advice provided at the Scoping stage and other mandatory requirements have been addressed by the proponent. Furthermore, it is unclear in the draft discussion paper what happens when the information provided by the applicant is inadequate.

In Council's experience most planning proposals when lodged with Council do not adequately address traffic impacts, urban design and interface matters. Most have to provide additional information and be subject to at least one redesign – if not more. The following two examples are provided:

- **Example 1** – A Planning Proposal which sought to amend the now Georges River LEP 2021 so as to permit a residential care facility with a maximum FSR of 1.6:1 and maximum building heights ranging from 12m, 14m and 16.9m at a site in the suburb of Hurstville. The PP was originally lodged in November 2017 however a satisfactory design was not lodged until September 2020. The following table illustrates the process of the PP through this lodgement stage.

Table 1 – History of Planning Proposal request

Date	Details
17 November 2017	Planning Proposal lodged
8 January 2018	Preliminary Assessment was undertaken by Council – Proponent requested to amend proposal or withdraw, with the principal concern being the bulk of the proposal.
9 April 2018	Councillor Briefing undertaken. Principal concern raised by the councillors related to the bulk of the proposal. No concern was highlighted with the land use.
3 May 2018	The application was reviewed by the Georges River Design Review Panel (DRP). The DRP found that the design could not be supported in its present form due to the bulk and both the FSR and HOB should be amended to allow for a lower density on the site.
25 June to 13 November 2018	The proposed scheme is revised three times in response to the DRP. The final revision dated 13 November 2018 proposed an FSR of 1.75:1. The scheme was further improved through the addition of building setbacks on all frontages of the building.
February 2019	Council was still concerned and sought independent urban design advice. Independent advice raised concerns regarding site compatibility, height, setbacks, deep soil landscaping and solar access.
6 August 2019	A revised concept design is submitted to Council. Amendments included changes to building layout to reduce the height and density of the proposed design at the Gloucester Road frontage.
17 December 2019	Referred for independent urban design assessment. Through this assessment, Council supports the 'W' footprint proposed; however, cannot support the proposal in its current form due to the lack of justification supporting the height, bulk and scale, potential overshadowing impacts and loss of deep soil area.
2 April 2020	Proponent submitted an updated concept plan and response letter amending the proposal in response to the December review.
5 May 2020	Third Independent Planning and Urban Design Assessment. Overall, this review confirms they are generally satisfied with the Proponent's updated response and modified concept design; subject to the resolution of setbacks, articulation and solar access.
13 August 2020	Proponent submits additional information regarding the proposal; providing

Date	Details
	draft clauses, urban design principles and additional traffic impact assessments.
September 2020	An amended Planning Proposal is submitted by the Proponent.

- **Example 2** – Planning Proposal to rezone a site in Peakhurst from R2 to B1 – Neighbourhood Centre as well as increase the height controls to part 12m and part 15m and increase the maximum FSR to part 1.5:1 and part 1.7:1. The Planning Proposal is accompanied by an offer to enter into a Voluntary Planning Agreement. The PP was lodged in August 2019 but the final design was lodged until February 2020; with the VPA offer not being finalised until June 2021.

The following Table provides a summary of the key events and amendments received leading up to the revised Planning Proposal lodged in February 2020.

Table 2 – History of Planning Proposal request

Date	Action
1 August 2019	Applicant lodged a Planning Proposal request with Council
5 September 2019	Council requested additional information and design changes.
14 February 2020	Revised Planning Proposal request submitted

Concern is also raised that the lodgement stage does not include the submission of documentation for any amendments to the Contributions Plan (i.e., supporting studies, identified works and cost estimates) and VPA offer where required.

- **Exhibition**

Comment

Concern is raised that the exhibition time does not take into consideration the pre-exhibition tasks required to be undertaken by council staff, including preparation of notification letters, newspaper advertisements, availability of hard copy documents at council and other mandatory consultation tasks. It is noted that proponents must provide a short, plain English summary of the proposal, its intent and justification and how it aligns with strategic plans, to be attached to notification letters. However, council staff will still need to review the information provided by proponents to ensure their suitability for distribution to the community.

It is also unclear in the discussion paper if the VPA offer and any amendment to the Contribution Plans should be exhibited concurrently with the rezoning application. The discussion paper does not reflect the Infrastructure Reforms and the proposed Direction which requires that contributions plans are required with planning proposals.

- **Post exhibition and Assessment and Finalisation**

Comment

Although proponents are required to summarise and respond to submissions received during the exhibition under the new approach, Council will need to review the submissions received and the responses provided by the proponent to determine whether all issues raised in the submissions have been adequately addressed by the proponent. If substantial changes to the rezoning application are required to address matters raised in the submissions, re-exhibition of the application may be required. Re-exhibition of the rezoning application may result in extended timeframes.

As part of the post-exhibition and assessment, if a rezoning application is inconsistent with a section 9.1 direction, the new approach suggests that:

- in some circumstances, a council can approve an inconsistency, rather than notifying the DPE and seeking approval from the secretary; and
- in other circumstances, the DPE will be given the opportunity to comment and/or approve an inconsistency.

If the onus of approving an inconsistency with a section 9.1 direction is on councils, this can lead to subjective decisions as each council will have their own interpretation of the objectives of the s9.1 direction.

If the DPE does not assess a rezoning application until the Finalisation stage and refuses the application based on the inconsistency with the section 9.1 direction, the rezoning process undertaken by a council would have been to no avail.

Council's Proposed Approach

In summary, the key issues raised by Council with the proposed rezoning application process are

- Insufficient time allocated for undertaking the Scoping stage tasks.
- Exclusion of negotiation, assessment, and preparation of a Voluntary Planning Agreement (VPA) or consideration of an amendment to a Contributions Plan prior to exhibition.
- Scoping timeframes not included in the overall timeframes.
- Inadequate timeframes allocated to the lodgement stage that do not take into consideration:
 - The review and endorsement of documentation submitted by the proponent.
 - Preparation of pre-exhibition tasks like newspaper ads and letters.
 - The submission of documentation for any amendments to the Contributions Plan and VPA offer where required.
- The only opportunity to refuse a rezoning application if it lacks strategic merit is in the final assessment stage and proponents will only have a chance to appeal at this stage.
- Unreasonable timeframes for deemed refusal periods.
- Lack of consideration of preparing exhibition material in the Exhibition timeframe.

- Unclear if the VPA offer and any amendment to the Contribution Plans should be exhibited concurrently with the rezoning application.
- The need for Council to review the submissions received and responses provided by the proponent to determine whether issues raised have been addressed.
- Issues related with placing the onus of assessing inconsistencies with a section 9.1 direction on councils.


One of the key issue is that the new approach does not address the Contributions Reforms - the rezoning process is not considered in conjunction with the Contributions Plan/ VPA process. It is essential that the demand and supply of public infrastructure and facilities resulting from a rezoning application are considered in the rezoning process.

The VPA and Contributions Plan process should commence at the beginning of the rezoning process with discussions occurring at the Scoping stage to enable sufficient time for these discussions and any required offers or studies to be prepared.

In response to the concerns raised above regarding the absence of the VPA and Contributions Plan process and other matters, Council has prepared three alternative staging and timeframe approaches:

- **Approach 1** represents a rezoning framework without a VPA (typically for Category 1 (Basic) and Category 4 (Principal LEP) applications).
- **Approach 2** represents a rezoning framework that includes the VPA and/or Contributions Plan amendment process (typically for Category 2 (Standard) and Category 3 (Complex) applications).
- **Approach 3** represents a zoning framework where the Local Planning Panel is the determining authority and there is no appeal rights for the final determination of the application . Suggested for Category 1 (Basic) and Category 2 (Standard).

Approach 1– Council amendments to the stages and timeframes for rezoning proposals not requiring a VPA or Contributions Plan amendment

	Additional Steps and Stages	Category 1 (Basic)	Category 2 (Standard)	Category 3 (Complex)	Category 4 (Principal LEP)
SCOPING	Consider site-specific and strategic context, organise Agency feedback and mandatory information requirements.	8 weeks / 2 months	10 weeks	12 weeks / 3 months / 90 days	24 weeks / 6 months / 180 days (depends on complexity)
					

LODGE / ADEQUACY TEST / APPROVAL TO EXHIBIT	New step in the Stage Council officers review rezoning application and issue Gateway with conditions – no Council resolution required before public exhibition. @	4 weeks	6 weeks	8 weeks / 2 months	8 weeks / 2 months
* APPEAL	New Stage # <i>Proponent can lodge an appeal with an independent body such as the LPP if Council officers refuse the rezoning application.</i>				
PRE- EXHIBITION	New Stage Includes organising exhibition, letters, ads, etc	4 weeks	4 weeks	4 weeks	4 weeks
EXHIBITION + POST- EXHIBITION	Community engagement and review of submissions.	4 weeks + 10 weeks	4 weeks + 13 weeks	8 weeks + 15 weeks (depends on complexity)	6 weeks + 17 weeks
ASSESSMENT, DETERMINATION & DPE FINALISATION	Determine implications of submissions and amendments required to proposal and prepare Council report.	11 weeks	17 weeks	24 weeks	26 weeks
APPEAL	<i>Proponent can lodge appeal with an Independent Planning body such as the Regional Panel or a newly created Commission if the rezoning application is refused by Council or DPE after public exhibition.</i>				
TOTAL	Excluding scoping stage	33 weeks	44 weeks	59 weeks	57 weeks
	Including scoping stage	41 weeks	54 weeks	71 weeks	83 weeks

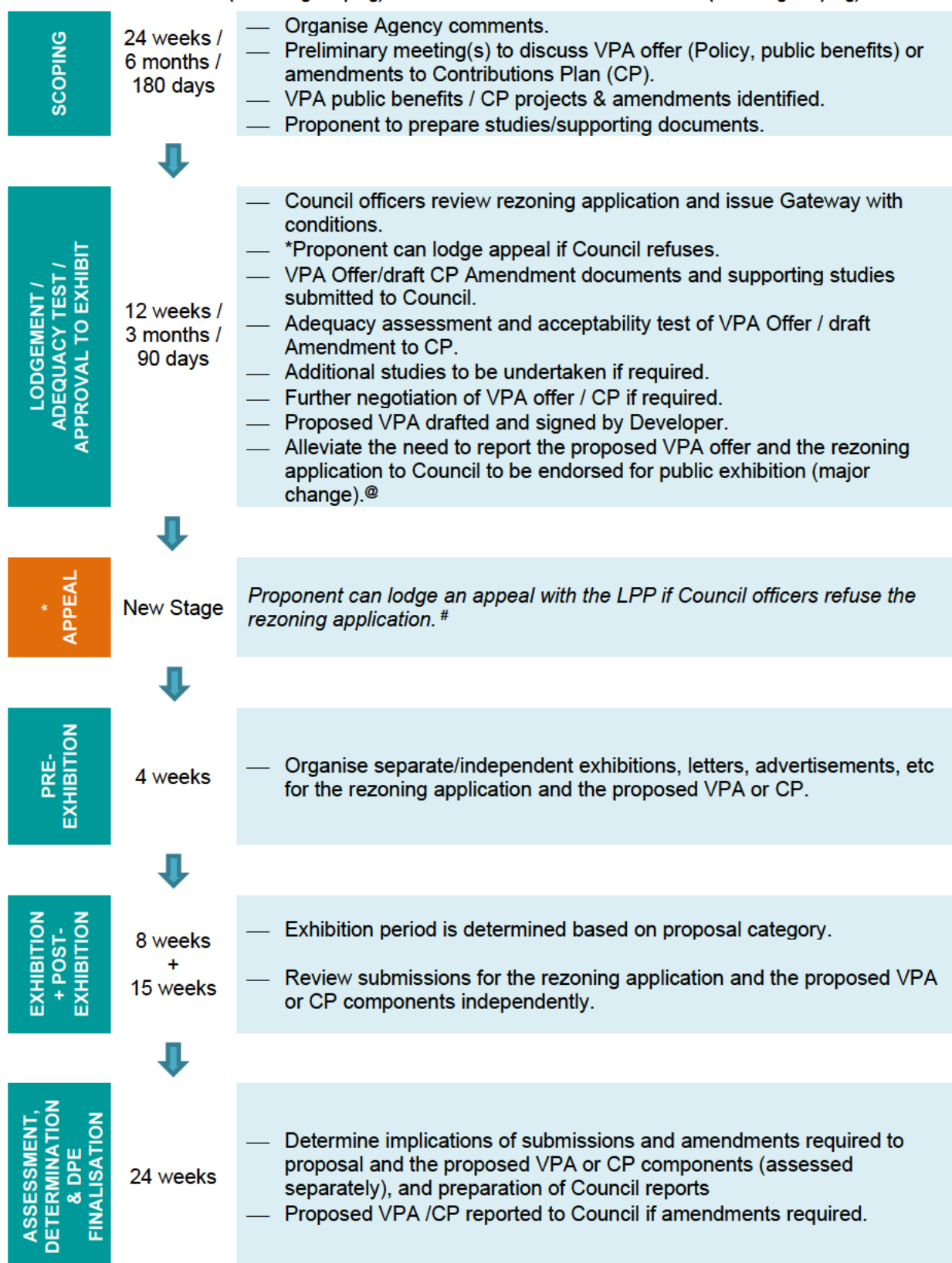
@ - Alternatively, the LPP can review a report prepared by Council officers and issue a Gateway with conditions

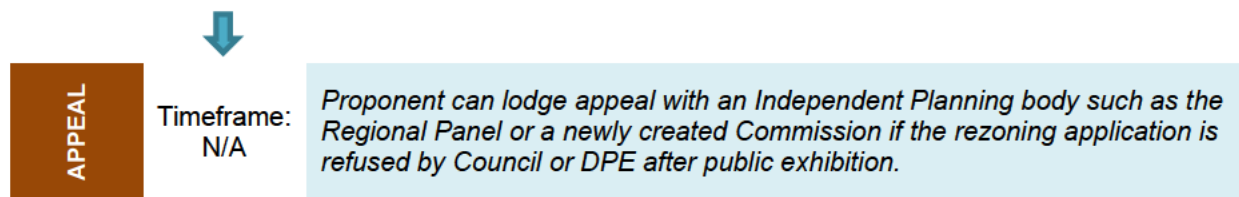
- If the LPP refuses to issue a Gateway rather than Council officers, no Appeal rights are afforded to the applicant

Approach 2 – Amendments to stages and timeframes for rezoning proposals requiring a VPA or Contributions Plan typically for Category 2 (Standard) and Category 3 (Complex) applications)

Total minimum timeframe (excluding scoping): 63 weeks

Total minimum timeframe (including scoping): 87 weeks



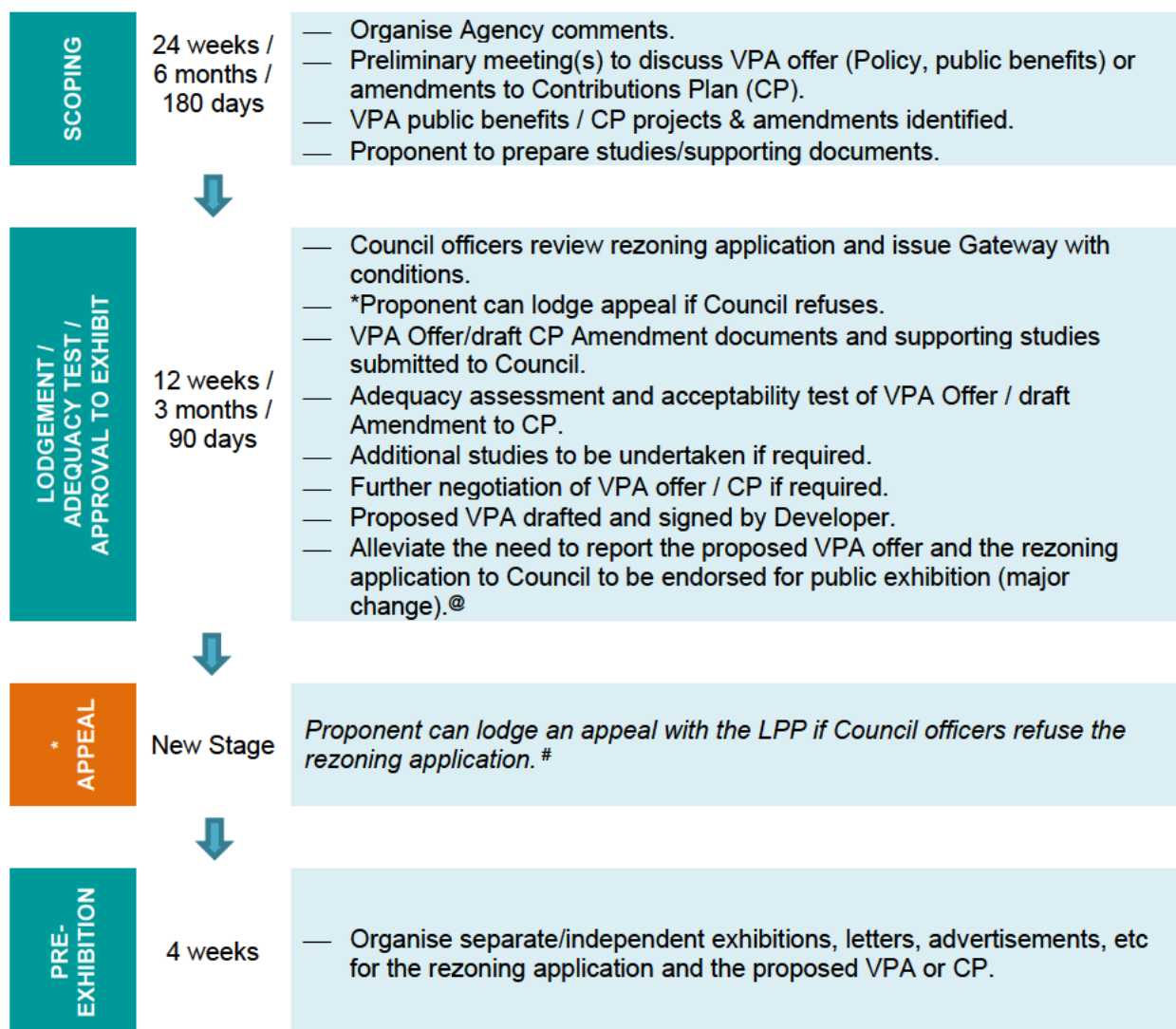


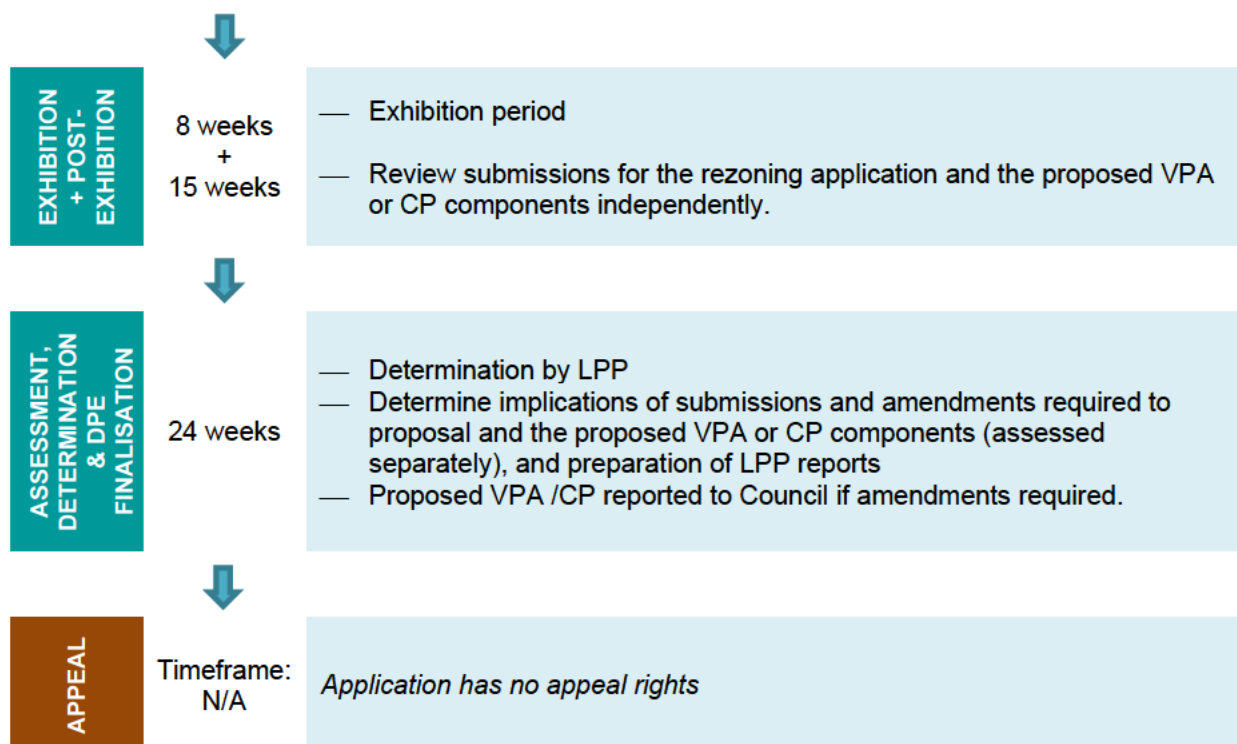
@ - Alternatively, the LPP can review a report prepared by Council officers and issue a Gateway with conditions

- If the LPP refuses to issue a Gateway rather than Council officers, no Appeal rights are afforded to the applicant

Approach 3 - represents a zoning framework where the Local Planning Panel is the determining authority

Note: The timeframe is based on a VPA Offer lodged with the rezoning application and is therefore based on a maximum timeframe.





@ - Alternatively, the LPP can review a report prepared by Council officers and issue a Gateway with conditions

An overview of the suggested staging and timeframe of the two approaches is provided below:

• Scoping

Recommendation

It is recommended that the timeframes be increased to adequately accommodate the time required for undertaking the tasks identified in the Scoping stage - site specific and strategic merit advice, Agency feedback, relevant mandatory information based on site constraints, and VPA/Contribution Plan amendment/s.

Consideration of inconsistencies with any section 9.1 directions by the DPE through an Agency referral needs to occur at the Scoping stage to avoid the refusal of the rezoning application at the Finalisation stage.

Timeframes for the Scoping stage have been increased from a range of 6 and 12 weeks to a range of 8 to 24 weeks for Approach 1 and 24 weeks for Approach 2.

• Lodgement

Recommendation

It is recommended that a new step be introduced within this State - with council officers review applications after lodgement and issue a form of approval (similar to the existing Gateway Determinations). The approval to exhibit could be subject to conditions. The application will not be reported to any panel or council meeting at this stage.

Council officers should also undertake an independent review of any VPA offer or amendments to the Contributions Plan. It is noted that this is a major change to the scope and timeframes in the draft discussion Paper.

Council officers should be able to ~~can~~ refuse an application if at this stage, if the application does not meet the strategic merit test or the information provided by the proponent is still unacceptable.

Council has amended the scope and timeframes for the lodgement stage from one week to a range between 4 and 12 weeks based on the category of the application - as demonstrated in the alternate approach/s above.

- **Appeal (New stage)**

Comment

The new approach to rezoning includes a review opportunity for private proponents at the end of the process if progress has been delayed or if the proponent is dissatisfied with the final decision.

Recommendation

Council has proposed an additional appeal stage after the lodgement stage where proponents can appeal to an Independent Panel (like the Local Planning Panel) if the rezoning application does not receive a Gateway approval to exhibit.

- **Exhibition**

Recommendation

As discussed above, concern is raised that the exhibition time is too short and does not take into consideration pre-exhibition tasks. Accordingly, an additional four-week stage called Pre-Exhibition has been recommended to accommodate extra time needed for pre-exhibition tasks including preparing newspaper advertisements, notification letters to the community. This time is also utilised for reviewing the exhibition material prepared by the applicant. Thus, the total timeframes for the Pre-Exhibition and Exhibition stage are increased from a range between 4 and 8 weeks to range between 8 and 12 weeks, based on the rezoning category.

- **Post exhibition and Assessment and Finalisation**

Recommendations

As discussed above, a thorough assessment of rezoning applications should occur at the Scoping stage through a council issued approval process to exhibit to reduce the need for re-exhibitions.

As discussed above, concern is raised regarding varying interpretations of section 9.1 directions between councils. Accordingly, inconsistencies with any section 9.1 directions should be assessed by the DPE through an Agency referral at the Scoping stage to avoid refusal of the rezoning application at the Finalisation stage.

Additionally, there needs to be a guideline for s9.1 directions, which will permit standardised/objective consideration of the directions by all councils.

Council does not recommend any changes to the timeframes for this stage.

3. Fees

1. Proposal – fee structure options

Currently, councils can charge fees for services under the *Local Government Act 1993* and rely on these fees for processing rezoning applications. These fees are levied outside of the planning system. Without relevant regulations, councils can structure and charge these fees as they wish, leading to varying fee payment structures between councils.

The discussion paper proposes a consistent structure for fees to proponents (other than council proponents) with consideration of 3 options:

- Option 1: Fixed assessment fees
- Option 2: Variable assessment fees
- Option 3: Fixed and variable assessment fees

Recommendation

It is recommended that Option 3 be implemented. A combination of fixed and variable assessment fees allows some fees to be standardised (e.g., lodgement fees), providing certainty for proponents and councils. It also allows councils to specify fees on an as required basis depending on the assessment requirements of the rezoning application. This would allow Council to retain some of the fees currently in our Fees and Charges, such as the assessment of additional reports and peer reviews undertaken by consultants.

In relation to Contributions Plan, there is a significant cost in preparing the required supporting studies (e.g., traffic and open space studies, and cost estimate reports). It is unclear who will bear this cost as part of this new rezoning process. However, it is recommended that these costs be recovered by the rezoning authority at the Scoping stage with the fees incorporated as a line item in the rezoning application fees which would be made possible through the implementation of Option 3.

2. Proposal – planning guarantee

With regards to fees, the discussion paper also proposes a planning guarantee which provides for a fee refund to proponents if councils take too long to assess the rezoning application.

Comments

Concerns are raised that the planning guarantee timeframes are unrealistic. The timeframes don't consider the multiple levels of referrals and reporting required for rezoning applications (such as design review panels and local planning panels / council meetings) and the engagement required with Councillors to brief them and

bring them along on the journey to ensure the proposal is supported following the assessment process. Each referral/reporting step has a 4-week lead time (12 weeks in total). This leaves only 5 weeks to assess and finalise the proposal, which is barely enough to consider and respond to submissions received during exhibition, let alone enough time to consider all the assessment criteria.

Concerns are also raised that planning guarantees may result in poorer quality assessments with resourcing pressure on councils.

Recommendation

Councils should not be required to refund proponents unless they withdraw their application and have paid for work that has not been undertaken. Delays in the process may occur from circumstances outside the control of the rezoning authority, such as the drafting process with the PCO which can often take longer than the assessment of the rezoning application and delays often experienced waiting for comments from public authorities.

If the planning guarantee is introduced, then councils must be able to refuse applications upfront without the threat of the proponent triggering an 'appeal' process. The quality of proposals currently received by Council is poor and they require extensive amendments as result of the assessment process.

4. Appeal body

Recommendation

As discussed above, it is recommended that proponents be afforded opportunities to lodge appeals on their rezoning application following the Lodgement stage if council officers do not issue approval to exhibit as well as after the Finalisation stage.

Council requests that the appeal process for rezoning applications be conducted by a Regional / State panel or by an Independent Planning Commission, where there is ample opportunity for reconciliation during the assessment process. This will ensure tailored expertise in strategic planning with experts possessing a range of expertise, including town planning, environmental, economic, and local issues, similar to the previous regional panels.

Consideration of appeals by a Regional / State panel or by an Independent Planning Commission is preferred to the Land and Environment Court as it is considered that the Court's structure, processes and legal expertise does not enable comprehensive analysis of the broader strategic planning approach required in considering a planning proposal. Such analysis requires assessment and negotiation of matters such as

- In terms of strategic merit,

- the relationship of the planning proposal to metropolitan and regional planning and whether or not it is consistent with the objectives and actions of the applicable regional or district plan or strategy
- If the planning proposal is the best means of achieving the objectives or intended outcomes, or is there a better way?
- The consistency with the State Environmental Planning Policy Framework and the applicable Section 9.1 Directions
- In terms of site specific merit:
 - A comprehensive review of the road network and the impact of the proposal on the broader road network and negotiations with TfNSW
 - The social, environmental and economic impacts of the planning proposal on the community and infrastructure within the LGA.

5. Conclusion

In conclusion Council officers support a stronger strategic planning process that aims to significantly reduce the time, cost and complexity of the rezoning process. However, as identified in this submission there are a number of areas that would benefit from further consideration and clarification. Significantly the new approach does not address the Contributions Reforms - the rezoning process is not considered in conjunction with the Contributions Plan/ VPA process. It is essential that the demand and supply of public infrastructure and facilities resulting from a rezoning application are considered in the rezoning process.

This submission suggests three alternative staging and realistic timeframe approaches. Council officers respectfully request that the Department consider these alternatives.