

31 January 2022

Daryl Quinlivan
NSW Agriculture Commissioner

Agricultural Land Use Planning
NSW Department of Primary Industries
Locked Bag 21 ORANGE NSW 2800

By email: agcommissioner@dpi.nsw.gov.au; ssalfeedback@dpi.nsw.gov.au

Dear Mr Quinlavan,

RE: Draft State Significant Agricultural Land Map

The Urban Development Institute of Australia NSW (UDIA) is the peak industry body representing the leading participants in urban development in NSW. Our 500 member companies span all facets of the industry from developers, consultants, local government, and state agencies, with 25% active in regional markets. UDIA advocates for the creation of Liveable, Affordable and Connected Smart Cities.

UDIA welcomes this opportunity to comment on the draft State Significant Agricultural Land map (draft SSAL map) currently on exhibition by the NSW Department of Primary Industries (DPI). We commend DPI for undertaking this mapping program and the approach DPI is using by engaging with the public on a journey to refinement. Accurate mapping is necessary to assist the development industry, landholders and planning authorities to make appropriate decisions on land use. UDIA is concerned that the mapping will be used for the assessment of planning proposals to meet the housing supply and jobs needs of NSW and therefore needs to be precise to avoid conflicts that would ultimately undermine housing supply and affordability.

We appreciate DPI's acknowledgment that the draft SSAL map is based on limited data and is expected to contain inaccuracies at this stage. In fact, our review of the map does show significant conflicts with land that has been identified by Council or an endorsed state government planning strategy for future urban development. These conflicts need to be rectified before the maps can be relied upon for any land use decisions by government.

UDIA has encouraged our members to provide direct feedback via the interactive mapping tool on DPI's website. In addition, some of our members have provided examples of anomalies to us and we are providing those through this letter. We caution that this feedback on the map is not comprehensive, and we urge DPI to seek a robust program of refinement to the maps by continued consultation with planning authorities, landholders and industry.

In addition to the mapped examples, our submission offers the following recommendations:

- 1. Low value agricultural land should not sterilise the potential use of that land for residential purposes.**
- 2. Current and future urban development land should be excluded from the SSAL map.**
- 3. The SSAL maps should exclude urban areas and identified future urban areas with an appropriate buffer, so that the SSAL mapping does not prohibit the orderly and economic use of land identified for urban purposes.**

Recommendations

RECOMMENDATION 1: Low value agricultural land should not sterilise the potential use of that land for residential purposes.

NSW is facing a deep housing supply and affordability crisis. It has the most expensive housing in Australia and some of the most expensive housing and land prices in the world. NSW is more expensive than other states because of the lack of supply of new homes. Over a long period, NSW has failed to build enough homes for the growing population, resulting in higher prices.

The 2021-22 NSW Intergenerational Report recognised the problem and estimated that we need 42,000 homes per year out to 2060. This is a significant ask, given that it is over 20 years since we reached anywhere near this level of construction. However, we are encouraged by the recognition of the issue by the new NSW Premier, reflected in his appointment of a Minister for Homes.

As the leading advocate for residential development in NSW, UDIA has been working with our members to look at what is required to deliver the 42,000 per annum.

We note that significant land use conflicts exist in coastal regions, east of the Great Dividing Range, where land tenure is undermined due to fragmentation, preventing maximum rural use. UDIA recommends that DPI should focus on reducing the amount of low value agricultural land. In our view, much of the east coast, and certainly east of the Dividing Range, is not suited to contemporary agricultural demands. The land parcels are too small and in conflict with many other land uses, as well as traffic and odour. Much of this land would be better suited to urban land uses to help NSW solve its housing supply and affordability crisis and provide houses close to jobs.

RECOMMENDATION 2: Current and future urban development land should be excluded from the SSAL mapping.

These locations have been chosen due to their proximity to future/planned services, jobs, and land-use suitability. The addition of a layer that indicates that the land has state significance for agricultural purposes ignores logical settlement patterns and the land-use conflict that can occur when agriculture is on the urban interface.

RECOMMENDATION 3: The SSAL maps should exclude urban areas and identified future urban areas with an appropriate buffer so that the SSAL mapping does not prohibit the orderly and economic use of land identified for urban purposes.

We note that the Coal Seam Gas exclusion zones include urban areas and incorporate a 2km buffer for urban use to reduce the potential for land-use conflict. This buffer approach should be applied to the SSAL map to avoid conflict.

Examples of Inaccuracies

UDIA has identified land that has been mapped as SSAL, despite it being identified for future urban development by the relevant Council and/or regional strategy. In general, we have seen enough anomalies in the draft maps that 'it is safe to say' the maps do not represent SSAL through the Sydney Megaregion from Illawarra, Sydney, Central Coast and Hunter.

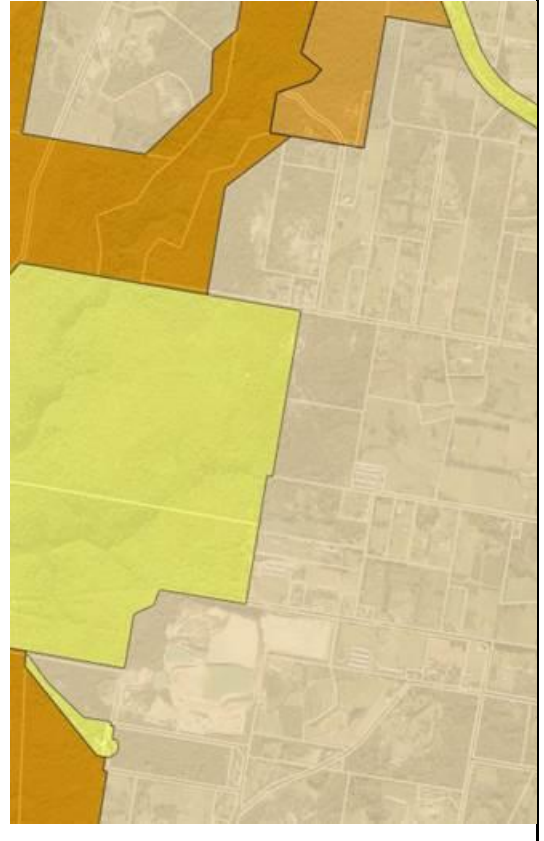
Several examples are listed below.

Draft SSAL Mapping	Zonings
<p data-bbox="245 237 885 300">Avoca Dr Avoca – Includes Avoca Bowling Club and adjacent Avoca Beach Hotel mapped</p> 	<p data-bbox="904 237 1444 264">Zone (E4 Draft CC LEP)</p> 
<p data-bbox="245 1104 885 1167">Tumbi Umbi – maps fragmented and developed rural residential land</p> 	<p data-bbox="904 1104 1444 1131">Fragmented E4 (C4) Zoned land</p> 
<p data-bbox="245 1910 885 1973">Peach Orchard Rd Ourimbah – maps fragmented and developed rural residential land</p>	<p data-bbox="904 1910 1444 1973">Peach Orchard Rd Ourimbah – Fragmented E4 (C4) Zoned land</p>



Patchy SSAL mapping of rural land at Somersby - sporadic

Rural land at Somersby mostly zoned RU1



Kulnura – some orchards and other land mapped but not others?

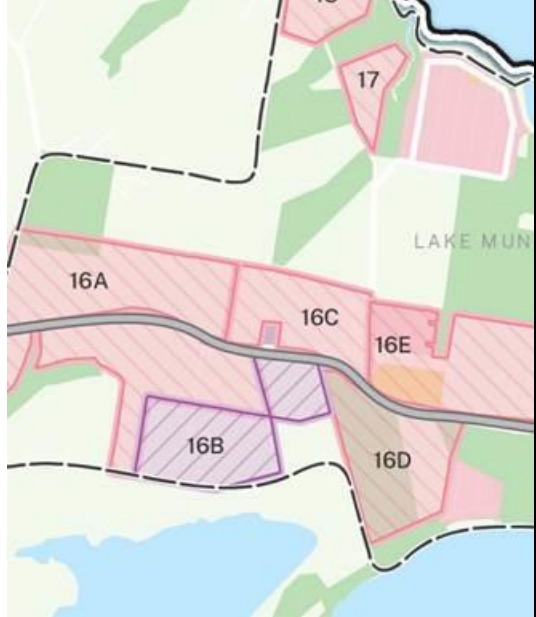
Land at Kulnura mostly zoned RU1






Lake Munmorah – SSAL mapping includes sporting fields, new urban release areas (including Darkinjung’s Planning Proposal area)



Extract from Draft CCRP2041



Hunter

Map	Comment
	<p>Medowie Road, Medowie.</p> <p>This location has been identified in the Port Stephens Council Medowie Strategy for future residential development. The Medowie Strategy was developed in 2013 in response to the State Government identifying Medowie as a Urban Release Area in the Lower Hunter Regional Strategy 2006.</p>
	<p>Clarence Town Road, Wallalong</p> <p>Wallalong has been safeguarded from development since it was first identified by Council as a 'future new town' in 2002. Wallalong has most recently been identified as a 'Future Potential Growth Area' in the Draft Hunter Regional Plan 2041.</p>
	<p>Tarean Road, Karuah</p> <p>Council has identified part of this land in the Karuah Growth Strategy and Draft Karuah Place Plan for future urban development. The Cadastre layer also reveals that most of this land is subject to past paper subdivisions.</p>

