

29 October 2015

Department of Planning and Environment  
Housing Land Release  
GPO Box 39, Sydney NSW 2001

Via e-mail to: [community@planning.nsw.gov.au](mailto:community@planning.nsw.gov.au)

Dear Director

**RE: Submission to The Greater Macarthur Preliminary Strategy and State Environmental Planning Policy (Sydney Region Growth Centres) 2006**

Urbanism in partnership with Aust Tech Engineering and Services Pty Limited represents the owners of 430 Appin Road, Gilead. We hereby make this submission on their behalf to the public exhibition of the Greater Macarthur Preliminary Strategy (GMPS) and State Environmental Planning Policy (Sydney Region Growth Centres) 2006.

We submit that the proposed Menangle Park / Mount Gilead priority precinct as identified in the GMPS should be extended south along Appin Road to the Campbelltown / Wollondilly LGA boundary. This should include all properties, including our client's property, which is dissected by the LGA boundary so that these may be planned for in a uniform manner.

Our client's property which is located only 700 metres south of the proposed Menangle Park / Mount Gilead priority precinct boundary. This site is ideal for urban development and could contribute a further 100 lots to the supply of housing within this precinct. Inclusion of this land within the Menangle / Mount Gilead priority precinct would enable detailed precinct planning and coordination of infrastructure services to occur in a timely manner. This would unlock additional land for urban growth and support the Department in achieving the housing strategies as outlined in *A Plan for Growing Sydney* (December, 2014).

Under the Strategy, Action 2.4.2: Develop a Framework for the Identification of New Growth Centres, identifies the need for the NSW Government to identify potential locations for new greenfield development giving particular attention to investigating the potential for greenfield development south and south-west of Campbelltown-Macarthur. This would include consideration of a range of issues including:

- the value of land for drinking water supply, agriculture, environmental management, resources, tourism and other purposes;
- constraints to development, including environmental constraints and natural hazards;
- private sector interest in developing particular land;
- proximity of land to current and planned locations of employment

- the cost of infrastructure provision including roads, water, sewerage, public transport, schools and health facilities; and
- the economic and social cost to communities of having relatively poor access to employment and services

Action 2.4.2 is the primary strategic basis for the GMPS, however, it does not appear that these criteria have been applied to our client's property in determining the extent of the proposed Menangle Park / Mount Gilead priority precinct boundary.

While recognising the opportunity to provide 35,000 homes in Menangle Park and Mount Gilead and in a new town at Wilton, the GMPS prematurely dismisses any further opportunities outside these areas as having significant infrastructure costs and environmental constraints.

However, landholdings in the locality surrounding our client's property are not significantly environmentally constrained as evidenced by the mining, biodiversity and waterways overlays on pages 9, 11 and 12 of the GMPS which do not identify our client's land as having high conservation values, current mining activities or flood liable land.

The GMPS states that areas outside the priority precinct are expected to 'retain rural uses' and states the following:

*"The poultry cluster, located around Appin and Douglas Park, and agricultural land identified as Class 2 under the Land and Soil Capability Assessment Scheme are identified as providing benefits to the area and wider region and should be retained."*

With the exception of the poultry farms identified, landholdings on the eastern side of Appin Road are typically smaller rural holdings between 5 and 10 hectares in size which are not large enough to support intensive rural / agricultural enterprises. These areas are effectively locked out of further consideration for future urban growth until after 2036 with only small scale expansion taking place, 'in line with existing post-Gateway planning proposals'. This is an underutilisation of otherwise developable land and should not be promoted by the GMPS.

The GMPS also identifies certain infrastructure upgrades necessary to sustain future urban growth within the Menangle Park / Mount Gilead priority precinct including the following:

- Upgrade the Hume Highway between Picton Road and Raby Road;
- Upgrades to Appin Road to provide direct connections to Campbelltown-Macarthur;

These upgrades will also service our client's land which is located only 700 metres south of the new proposed Menangle Park / Mount Gilead priority precinct. Lands in this locality cannot be considered to be significantly more costly to service given the close proximity of the proposed priority precinct boundary. It would appear premature to not consider including this site in the priority precinct given that it will benefit from improved transport infrastructure within the locality.

To address the concerns we have raised, we submit that the following amendments to the GMPS and SEPP are made:

- The Menangle Park / Mount Gilead priority precinct boundary be amended to include all those lands south along Appin Road to the Campbelltown / Wollondilly LGA boundary. This should

also wholly include properties such as our client's which is dissected by the LGA boundary so that these sites can be planned in a uniform manner.

- The GMPS clarifies the potential for additional rezoning applications to be made which bring forward urban development on lands such as our client's land where the constraints outlined in the GMPS can be satisfactorily addressed. This will provide landowners with greater certainty that there are appropriate mechanisms available to bring forward additional housing supply not specifically identified in the GMPS.

The GMPS places an inefficient restriction on development of lands outside the priority precinct boundary which may be wrongly interpreted by local authorities as a defence for not considering new rezoning proposals on lands which are otherwise suitable for additional housing supply.

We strongly believe that the GMPS should not unnecessarily lock out consideration of certain lands until after 2036 as this will only further constrain the supply of land for new housing.

Please contact the undersigned on 0414 064 869 or at [folitarik@urbanism.co](mailto:folitarik@urbanism.co) if you would like to discuss this submission in further detail.

Kind regards



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