



4 November 2015

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

GREATER MACARTHUR PRELIMINARY LAND RELEASE STRATEGY

This submission has been prepared on behalf of Anglican Retirement Villages (ARV). ARV owns a 26.26 hectare site at 91 Menangle Road, Menangle Park (the ARV Site). The ARV Site is within the Menangle Park and Mount Gilead Priority Precinct of the Greater Macarthur Land Release Investigation Area.

ARV supports the Greater Macarthur Preliminary Strategy & Action Plan and also the proposed inclusion of the Menangle Park and Mount Gilead Priority Precinct within State Environmental Planning Policy (Sydney Region Growth Centres) 2006.

ARV acknowledges the Greater Macarthur Land Release Investigation Land Use and Infrastructure Analysis and agrees in principal with the broad strategic findings and recommendations set out in that document.

Although the information presented in the Land Use and Infrastructure Analysis is still at a broad strategic level in terms of detail, it is generally consistent with ARV's own more detailed site specific data and environmental information, and confirms ARV's own assessment that the ARV Site is largely free of environmental constraints and is suitable for future urban development.

ARV therefore acknowledges and agrees with the categorisation of the ARV Site in the Preliminary Strategy & Action Plan as 'unencumbered urban land' being land that may be suitable for urban development.

ARV intends to develop its Site for seniors living, to be owned and operated by ARV in perpetuity.

In order to facilitate development of the land, which is currently zoned 1A Non-Urban under the provisions of Campbelltown Interim Development Order No.15, ARV has commenced concept planning for the Site, and has also initiated preliminary discussions with Campbelltown City Council (CCC) in relation to the submission of a local Planning Proposal to rezone the land. ARV intends to pursue a Planning Proposal that gives a residential land use zoning to the Site and establishes key development standards including height and FSR. More detailed site specific provisions for inclusion in a development control plan will be prepared in consultation with the Council as appropriate.

ARV is highly supportive of the stated intention of the State government to progress the rezoning of the land for urban purposes. However, in acknowledgement of the likely timeframe for resolution of the rezoning of the entirety of the Menangle and Mount Gilead Priority Precinct, ARV wishes to advise the Department of Planning & Environment of its intention to proceed with the lodgement of a Planning Proposal with CCC in advance of / in parallel with the State government's consideration of the broader rezoning.

This submission:

1. Provides an overview of the ARV Site and its key environmental characteristics;
2. Confirms the implications of the Department's Land Use and Infrastructure Analysis and Preliminary Strategy & Action Plan on the future development potential of the ARV Site;
3. Summarises the key planning issues relating to a proposed ARV preliminary concept for a future seniors living development;
4. Provides an overview of how key planning issues can be appropriately managed should the rezoning of the ARV Site be progressed in advance of the rezoning of the broader Priority Precinct; and
5. Requests the Department to confirm to ARV if the initiation of a Planning Proposal for the land by CCC in parallel with the State government's actions underway in relation to the broader Menangle and Mount Gilead Priority Precinct would be required to follow a planning process other than the standard Gateway referral process.

1. ARV Site

The 26.26 ha ARV Site (Lot 12 DP 749669) is located on the eastern side of Menangle Road in the northern portion of the Menangle Park and Mount Gilead Priority Precinct, close to the existing suburbia of Campbelltown. The land is currently vacant, partially vegetated and partially cleared, and is subject to existing electricity, water and pipeline easements.

Figure 1 shows the ARV Site in relation to the proposed boundaries of the Menangle Park and Mount Gilead Priority Precinct.

Figure 2 is an aerial photograph illustrating the site.

The site is currently identified by CCC as bushfire prone land (Vegetation Category 1 and 2).

The ARV Site immediately adjoins the boundary of the Menangle Park land release area to the east (on the opposite side of Menangle Road) and the existing Broughton Anglican College to the north on Menangle Road.

The Site is located within 100 metres of the Menangle Road overpass which crosses the Hume Highway, providing direct access to the Menangle Park Release Area, an 888 ha site that is in the process of being rezoned to accommodate approximately 3,400 new dwellings. The Menangle Park release area will include a new town centre with approximately 20,000 – 30,000 m² of employment GFA. The Menangle Park railway station is located within this land release area.

The Hume highway and Menangle Road provide access to the Campbelltown Centre.

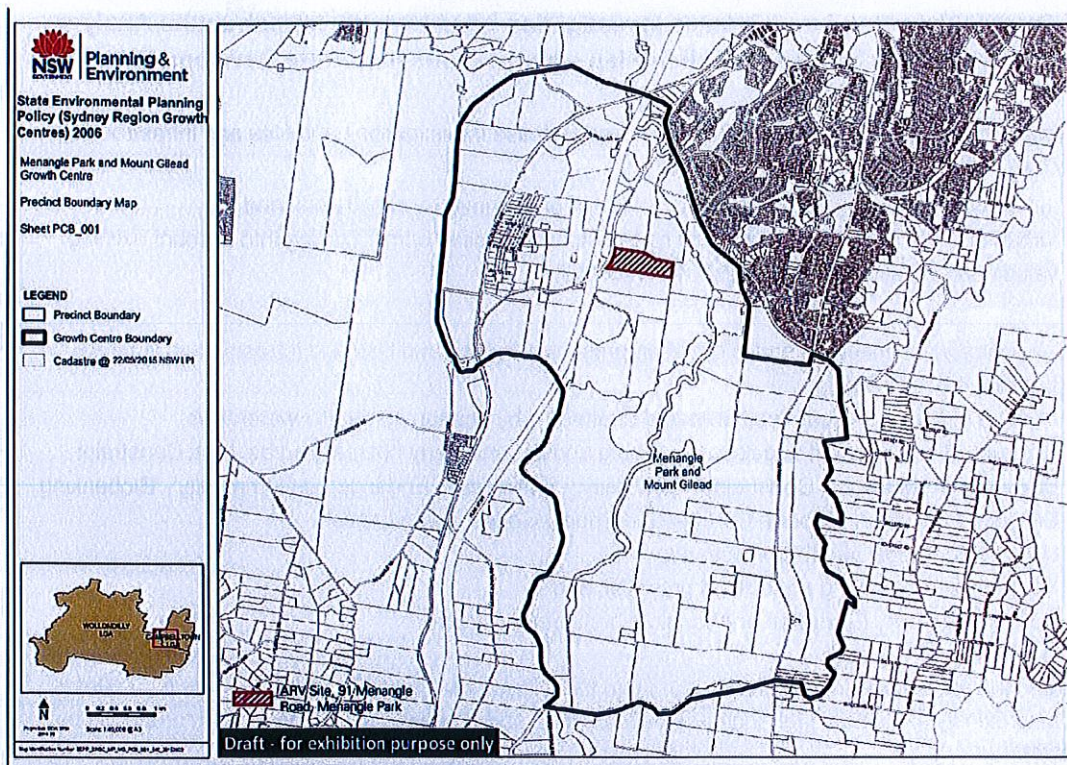


Figure 1 ARV Site in relation to Menangle Park and Mount Gilead Growth Centre boundary



□ The Site

Figure 1 Aerial photograph of ARV Site

2. Greater Macarthur Land Release Investigation Land Use and Infrastructure Analyse and Preliminary Strategy & Action Plan – Implications for Future Development

As broadly identified in the Greater Macarthur Land Release Investigation Land Use and Infrastructure Analysis the ARV Site has been identified as:

- 'urban capable' in respect of being free of major environmental constraints; and
- 'urban suitable' in respect of potential release for urban development taking into account existing values and constraints, and infrastructure capacity.

More specifically, the mapping and information presented in the Land Use and Infrastructure Analysis identifies that the ARV Site is:

- Outside of the 1:100 year flood area and unaffected by riparian corridors / waterways;
- Not subject to significant vegetation mapping and in particularly not mapped as 'High Constraint Biodiversity', 'Moderate Constraint Biodiversity', 'Ecologically Endangered Community', 'Biobanking Site' or 'Hawkesbury Nepean Corridor and Priority Conservation Lands';
- Unaffected by coal seam gas reserves;
- Not identified as having agricultural potential; and
- Not subject to any European or Aboriginal heritage constraints.

As stated the ARV Site is immediately adjacent to the existing Menangle Park land release area, and is in close proximity to the new Menangle Park town centre and proposed new major road interchange to the north.

The Land Use and Infrastructure Analysis identifies the ARV Site as being within Landscape Unit Area 2 – Scenic Hills (identified hills that make up the Campbelltown Scenic Hills). This landscape categorisation is nominated as being of 'low to moderate' scenic quality with a moderate absorptive capability.

The Land Use and Infrastructure Analysis categorises the ARV Site as 'Developable Land' being *"land that may be suitable for urban development. Development is likely to be predominantly housing. Some of this land may contain environmental and heritage values that constrain the land and will need to be assessed in any future rezoning process. These values may reduce the development potential or may require offsets. Infrastructure provision, utilities servicing requirements and other constraints such as natural hazard susceptibility, the presence of contamination and geotechnical matters may also reduce the area of land available for urban development."*

Having regard to the Land Use and Infrastructure Analysis, subject to refinement through more detailed site specific investigations it has been concluded that the ARV Site is relatively free of major environmental constraints and is suitable for development for residential purposes.

3. Key Planning Issues

At this stage of the planning process the ARV project team has identified the following key environmental considerations as likely to influence the rezoning of and future development outcome for the Site:

- Accommodation of existing easements for water, electricity and pipeline;
- Potential setback to Menangle Road to facilitate future road widening (if needed as part of the broader Menangle Park and Mount Gilead Priority Precinct development);
- Vegetation removal / retention;
- Relationship between future built form and natural topography / landscape setting; and
- Accommodation of permanent / temporary bushfire asset protection zones.

A copy of a preliminary site analysis drawing identifying the relationship between these key environmental considerations is included at **Attachment A**. The preliminary site analysis demonstrates that of the total 26.26 ha site area, approximately 14 ha is developable.

In addition to the above, there are a number of key planning issues associated with the future rezoning and development of the ARV Site for seniors housing. In broad terms these are considered to be:

- Traffic and accessibility to public transport services;
- Proximity to existing and future services, including shops, community services, doctors, recreation facilities etc;
- Utility services capacity;
- Density and built form;
- Contributions towards State and regional infrastructure provision.

To assist in informing and support the Planning Proposal and the preparation of appropriate planning controls by the Council, Integrated Design Group has prepared a preliminary concept proposal for the future development of the site.

A copy of ARV's preliminary concept proposal for the future development is included at **Attachment A**.

The main features of the preliminary concept proposal are:

- A setback to Menangle Road of approximately 20 metres;
- An internal street network based on a grid layout;
- A combination of independent living units (approximately terrace, courtyard apartment units and small lot housing and small lot dwellings) and a residential aged care facility (approximately 432 beds) comprising up to three storeys in form and 'nestled' to existing topography;
- Establishment of an internal administration / 'village' centre including a care precinct (for onsite medical treatment), health and recreation space (swimming pool, gym facilities etc), café, community rooms and chapel;
- Internal accessible open space / landscaped space;
- Provision for future permeability in terms of pedestrian and vehicular connections to adjoining land;
- Accommodation of existing utility services easements; and
- Incorporation of bushfire asset protection zones.

ARV has commenced the scoping of detailed site specific investigations to support the rezoning of the Site. Specifically, it is the intention of ARV to commission the following studies to inform proposals for the future development as part of the preparation of a site specific Planning Proposal:

- Flora and fauna study;
- Bushfire report;
- Traffic and transport analysis;
- Utility services capacity analysis and concept;
- Stormwater concept;
- Human services assessment.

Further work will also be undertaken on visual analysis and built form options.

Once prepared, these more detailed site specific investigations will inform refinement of the preliminary concept proposal.

4. Management of Planning Issues in Context of Broader Menangle Park and Mount Gilead Priority Precinct Rezoning

It is understood that the preferred rezoning process for the Menangle Park and Mount Gilead Priority Precinct is via a State led process under the Growth Centres SEPP.

ARV does not object to this process. However as a large land holding that is currently in single ownership, and that will continue to be owned and operated by ARV in perpetuity, the opportunity exists to manage the environmental constraints and to propose a land use zoning and development control regime for the land in advance of, and in a manner that will not prejudice the strategic planning for the broader Priority Precinct in any way.

Strategic planning for the broader Menangle Park and Mount Gilead Priority Precinct is in its early stages and is likely to take several years to reach conclusion. By contrast, ARV is relatively well advanced in terms of developing its concept proposals for the site and is ready to progress a rezoning proposal in the short term.

In particular, ARV wishes to note:

- ARV will fully fund all environmental studies and investigations that are necessary to support submission of a site specific Planning Proposal to the Council;
- A site specific Planning Proposal would be consistent with the strategic findings and recommendations of the Land Use and Infrastructure Analysis and Preliminary Strategy & Action Plan i.e it would be 'strategy consistent';
- With housing within the immediately adjoining Menangle Park release area expected to be delivered within the next two years, the ARV Site will fall within an urban context within the very short term;
- Progressing the rezoning of the ARV Site would not preclude any other future land uses that might be identified on adjoining land. Seniors living development is compatible with a broad range of potential adjoining land uses;
- No further fragmentation of land holdings - which may have the potential to prejudice future development options for other land within the broader Priority Precinct - will occur;
- Subject to confirmation via further site specific flora and fauna investigation, the removal of onsite vegetation is unlikely to have any impact on any broader strategy for biodiversity retention within the Precinct. ARV will meet any site specific biodiversity retention requirements should they arise (unlikely);
- ARV is able to accommodate a future road widening of Menangle Road, should it be determined as being required, and will also retain existing utility services easements within the future development footprint;
- The site can, if necessary, be developed in a 'self-contained' manner in terms of drainage, sewer, electricity etc;
- As the owner and operator of the development, ARV has control over the scope and timing of provision of the onsite services and facilities that will be needed to cater for the needs of future residents. Although already serviced by public transport, ARV is also able to facilitate private transport access (eg community bus) to both the Campbelltown City Centre and the future Menangle Park town centre on an interim basis, irrespective of the timing of redevelopment of other land holdings within the broader Precinct.

It is understood that the State government intends that unencumbered urban land will be released only where funding commitments to meet infrastructure servicing requirements are made either by private accelerated proposals or by the State government, and that it is likely that Menangle Park and Mount Gilead will be declared as a Special Infrastructure Contributions Area to coordinate the funding and delivery of infrastructure that is necessary to support growth (p.5 LUIS).

ARV understands the need to appropriately contribute towards the provision of State infrastructure, and is willing to progress as required by the State government towards this end.

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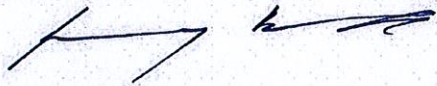
Whilst ARV is still in the preliminary stages of considering options for utility services provision, it is noted that ARV is in a position to provide fully self-contained outcomes in terms of utility services if required. ARV has undertaken these early works in order to facilitate development on other ARV sites at Glenhaven and Warriewood. These were undertaken in advance of release areas. ARV, as owners and managers of the site, can provide all infrastructure, protected on title and managed as necessary.

5. CONCLUSION

We trust that the above is satisfactory.

Please do not hesitate to contact the undersigned on 9956 6962 or lbull@jbaurban.com.au should any matters raised herein require clarification, or should further information be needed.

Regards

A handwritten signature in black ink, appearing to be 'Lesley Bull', written in a cursive style.

Lesley Bull
Director

cc Nicole Woodrow, ARV
Jeff Lawrence, Campbelltown City Council