

11 November 2015

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

[community@planning.nsw.gov.au](mailto:community@planning.nsw.gov.au)

Dear Sir/Madam,

**Moreton Park Road Menangle, Planning Proposal - Submission to the Greater Macarthur Preliminary Land Release Strategy and proposed amendments to State Environmental Planning Policy (Sydney Region Growth Centres) 2006**

We wish to provide a submission in relation to the recently-exhibited Greater Macarthur Land Release Preliminary Strategy (the Greater Macarthur Strategy) and the proposed amendments to State Environmental Planning Policy (Sydney Region Growth Centres) 2006 (the Growth Centres SEPP).

**Summary of our position**

We provide in-principle support for the notion of urban development and land release in the Greater Macarthur Region.

However, the 'known proposal' at Moreton Park Road Menangle, is not considered to have been 'refused' by the Joint Regional Planning Panel (JRPP) as the Greater Macarthur Strategy suggests. Rather, the Planning Proposal (on 27 March 2014):

- Was "considered to be premature in the absence of a more detailed strategic analysis of the framework for development of Macarthur South
- Investigation should be undertaken in conjunction and aligned with the investigations already underway in Macarthur South"

It is now considered that the Greater Macarthur Strategy provides a framework for the consideration of the Planning Proposal at a future date, as there is now support outlined in the supporting strategies.

**Who is Souwest Developments?**

Souwest Developments Pty Limited controls approximately 600 hectares of land in the Macarthur Area. These landholdings include two parcels of land recognised as 'known proposals' within the 'Menangle and Douglas Park' Precinct, being:

- Station Street, Menangle (a planning proposal for 350 new residential lots, as well as a neighbourhood centre allowing for the adaptive reuse of a number of heritage assets)
- Moreton Park Road (a planning proposal for 240 hectares of employment land).

## The Moreton Park Road Planning Proposal

Souwest Developments prepared a Draft Planning Proposal in March 2011 for rezoning to a range of uses including employment, residential and recreational. In April 2013, we provided correspondence to the NSW Department of Planning and Environment (DP&E) omitting commercial/office use, with a focus on warehouses, logistics and manufacturing businesses, consistent with the IN1 General Industrial Zone.

On 27 March 2014, the JRPP provided the following advice and justification for recommendation:

*"The Panel has considered the planning proposal, and at this stage considers the planning proposal to be premature in the absence of more detailed strategic analysis of the framework for development of Macarthur South, including employment, housing, infrastructure and transport arrangements.*

*Any investigation should be undertaken in conjunction and aligned with the investigations already underway in the Macarthur South area. In particular, the boundaries of the West Appin Investigation Area should be amended to incorporate the subject lands proposed for employment purposes".*

For the above reasons the Panel unanimously recommended that the Planning Proposal should not proceed to gateway determination.

A copy of the JRPP advice is included in this submission (**Annexure A**).

### Our understanding of the Greater Macarthur Strategy

The Greater Macarthur Strategy provides a high-level strategic framework for the delivery of over 24,000 new homes in close proximity to the South West Growth Centre of Sydney. It builds on the State Government's 'Plan for Growing Sydney' (i.e. the Metropolitan Strategy) by:

- Maintaining a continued presence in Sydney's south west.
- Prioritising an increased rate of housing delivery in new urban release areas.

The Greater Macarthur Strategy identifies two 'Priority Precincts' for urban development purposes, being:

- Menangle Park and Mount Gilead
- Wilton

In addition to the two 'Priority Precincts', there are three 'Other Precincts', being:

- West Appin
- Cataract

Menangle (which is the precinct that incorporates Station Street 'known proposal' and Douglas Park (which is the precinct that incorporates the Moreton Park Road 'known proposal')

In terms of DP&E's position, we understand that the Moreton Park Road Planning Proposal is identified as a 'known proposal' under the *Greater Macarthur Land Release Investigation Land Use and Infrastructure Analysis* (Page 10). The Greater Macarthur Strategy states the following with regard to 'known proposals':

*"While these proposals would provide additional housing stock to the area, planning for the area with a holistic, rather than piecemeal, approach provides efficiencies in the delivery of services, transport and social infrastructure.*

*A holistic approach provides an understanding of what is necessary to accommodate the future population of the wider area and provides the framework for significant pieces of infrastructure to be delivered, such as major roads. In turn, this offers a more desirable place for residents to live and provides employment opportunities and services which may not otherwise be realised" (page 10).*

The *Land Use and Infrastructure Analysis* for the Greater Macarthur Strategy states that areas outside of Menangle Park, Mount Gilead and Wilton (i.e. the 'Priority Precincts') have 'significant infrastructure costs and environmental constraints', however these areas provide opportunities for 'longer term supply' (Page 2). The Land Use and Infrastructure Analysis also states that up to 2036, the areas outside of Menangle Park, Mount Gilead and Wilton will remain rural in nature, with 'small scale development that can be supported by the existing infrastructure and transport network' (Page 2).

We also note that the Moreton Park Road Planning Proposal is located on land that is considered (by the Draft Greater Macarthur Strategy) to be 'encumbered by constraints which are resolvable with appropriate environmental or staging measures'. Part of the land is also recognised as being 'not suitable for development' (as it is flood-affected) by DP&E. Further, there are three key land use constraints:

- Mining (which is soon to be finished under the area proposed to be rezoned to employment lands)
- Heritage conservation (to which there are no significant items in the area)
- Poultry clusters (to which there are none, in close proximity to the area proposed to be rezoned).

Moreton Park and the Moreton Park Road Planning Proposal is also specifically referred to in a number of specialist studies. These studies and the specific references are outlined in the following table:

Specialist Report	References to Moreton Park Road within the Specialist Report
<b>Greater Macarthur Investigation Area Economic and Employment Analysis</b> SGS Economics and Planning	<p>Maldon and North Douglas Park Industrial (around Moreton Park Road) have been identified as prime candidates to accommodate the Strategic Industry and Footloose demand for the Greater Macarthur Investigation Area due to existing industrial clusters, access to rail and the Hume Highway.</p> <p>Industrial development should be supported where proposed and employment development at Maldon and to the east of the Hume Highway at Moreton Park Road <b>should be encouraged early</b>.</p> <p>The medium to long-term potential of the industrial area around Moreton Park Road (identified in the report as 'Douglas Park North Industrial') as a location for future footloose and subregional industry hub and Wilton Junction as a strategic centre, <b>must be emphasised</b>.</p>
<b>Greater Macarthur Land Release Investigation – High Level Services Infrastructure Strategy</b> AECOM	<p>The Indicative Service Infrastructure Based Staging Plan, identifies that the Menangle and Douglas Park (the precinct to which the Moreton Park Road Planning Proposal falls into), will form part of Stage 5, of a six-stage project across the entire Macarthur South Area.</p>

## Our Position

It is our opinion that the 'more-detailed strategic analysis of the framework for development of Macarthur South' (as referred to by the JRPP) has been completed now as part of the Greater Macarthur Strategy. At a conceptual level, it has been determined that the land would provide an overall strategic benefit for the Greater Macarthur Region. This provides an opportunity for the Moreton Park Road Planning Proposal to be considered in the immediate future, as there are limited employment lands in the Menangle Park/Mount Gilead and Wilton areas. The Moreton Park Road Planning Proposal (which constitute 240 hectares of employment land) would provide critical jobs within the immediate proximity to these new, residential lands.

The key land use constraints identified for the Menangle and Douglas Park Precinct can be addressed and quantified in accordance with any future Planning Proposal for the Moreton Park Road landholding.

In addition, the Moreton Park Road Planning Proposal is consistent with, and will assist in achieving, a number of the strategies of the Wollondilly Community Strategic Plan 2033. The relevant strategies are identified below:

- CO1 - Community building, well-being and identity  
Deliver a range of community programmes, services, facilities and events which strengthen the capacity, well-being and cultural identity of our community.
- EN2 – Growth Management  
Apply best practice environmental principles to the management of future growth.
- EC3 – Manage Growth  
Encourage and manage growth to ensure that it contributes to economic well-being.
- EC4 – Managing development and Land Use  
Manage and regulate land use and development in order to achieve a high quality built environment which contributes to economic well-being
- IN3 – Provision of Facilities  
Provide a range of recreation and community facilities to meet the needs of the community

## **Conclusion and Recommendation**

The Moreton Park Road Planning Proposal is considered to be consistent with the overarching objectives of 'the Plan for Growing Sydney' and the Greater Macarthur Strategy.

The key land use constraints identified in the Greater Macarthur Strategy for the Menangle and Douglas Park Precinct, can also be assessed, quantified and readily satisfied in accordance with any future Gateway Determination.

Souwest Developments has a suitably large landholding which can provide a valuable contribution to the Greater Macarthur Region. It could provide appropriate employment opportunities to cater for the growing needs of the region.

Thank you for the opportunity to provide a submission on the Greater Macarthur Strategy. Please do not hesitate to contact me should you require further clarification regarding our landholding at Moreton Park Road, Menangle. I can be contacted via email at [ernest@benedict.com.au](mailto:ernest@benedict.com.au) or 0407 282 444.

Yours Sincerely,



Ernest Dupere  
Director  
Souwest Developments

## **Annexures:**

A JRPP Advice on Moreton Park Road (27 March 2014)

# **RECORD OF DECISION**

## **SYDNEY WEST JOINT REGIONAL PLANNING PANEL**

### **27 March 2014**

**Members:**

Mary-Lynne Taylor	Chair
Bruce McDonald	Panel Member
Lindsay Fletcher	Panel Member
Lou Amato	Panel Member
Peter Wright	Panel Member

**Addressed the panel on behalf of the proponent:**

Brian Elton (consultant)  
Fiona van der Hoeven (consultant)  
Ernest Dupere (proponent)

**Apology:** Nil

The Panel, as the Relevant Planning Authority as appointed by the Minister to consider the following planning proposal and this is a record of the process and decision.

**Business Item****ITEM 1 - Moreton Park Road, Menangle - The proposal seeks to rezone land at Moreton Park Road for employment uses (2013SYW081 – Wollondilly Local Government Area – Proponent: Menangle Pastoral)**

The Panel advice and justification for recommendation:

1. The Panel has considered the planning proposal, and at this stage considers the planning proposal to be premature in the absence of more detailed strategic analysis of the framework for development of Macarthur South, including employment, housing, infrastructure and transport arrangements.
  2. Any investigation should be undertaken in conjunction and aligned with the investigations already underway in the Macarthur South area. In particular, the boundaries of the West Appin Investigation Area should be amended to incorporate the subject lands proposed for employment purposes.
  3. For the above reasons the Panel unanimously recommends that the planning proposal should not proceed to gateway determination.
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Advisory notes:

1. The Panel's advice relates to the most recent planning proposal for industrial uses, amended by the proponent on 19 June 2013.
2. The Panel notes that a pre-Gateway review for Station Street, Menangle for Residential rezoning has already received favourable Gateway determination.

Endorsed by



Mary-Lynne Taylor  
Chair  
Sydney West  
Joint Regional Planning Panel  
Date: 27 March 2014