12 November 2015

Our Ref: 15-210

NSW Department of Planning & Environment
GPO Box 39
SYDNEY NSW 2001,

Dear David,

RE: GREATER MACARTHUR LAND RELEASE - 430 TO 490 DOUGLAS PARK DRIVE, DOUGLAS PARK

City Plan Strategy & Development P/L (CPSD) was engaged by BGA Capital to consider the proposed Greater Macarthur Land Release in relation to their land at 430 - 490 Douglas Park Drive, Douglas Park. We have reviewed the various information, including the various technical studies, released by the NSW Department of Planning & Environment (DPE) in relation to the proposed land release.

For the purpose of our assessment, we have considered our client's site in combination with the adjoining St Mary's Retreat site. Given both sites are in close proximity to each other, and substantially cleared of any vegetation, this was considered to be a logical town planning approach. The following aerial view identifies the two site areas, as well as the combined site area.

Below is an extract of DPE’s ‘urban capable boundary’ map as well as the ‘Greater Macarthur Preliminary Land Release Strategy’. The approximate boundary of our client’s site (the subject site), as well as that of the combined site area is nominated on each plan.


As the images demonstrate, the subject site forms part of the urban capable area, but does not form part of the priority release precincts. We’re of the opinion the subject site, in conjunction with the adjoining St Mary’s Retreat Centre, should form part of the Wilton Junction Priority release area. We form this opinion for the following reasons:

- The combined site area, exclusive of the most vegetated portions, is approximately 190 hectares.
- Such a site area is sizeable and capable of providing a large number of dwelling opportunities.
- The combined site area is already cleared of most vegetation and therefore, easily developable.
- The combined site area is currently accessible by road.
The combined site area is currently serviced with most utilities, including town water and electricity.

Typically suburban development (e.g. residential allotments) immediately adjoins the subject site. That is, the locality currently provides a quasi suburban character and therefore lends itself to further suburban development.

In addition to the above, we believe the technical studies relied upon by DPE to inform the release area to date also supports the inclusion of the abovementioned area within the Wilton Junction priority precinct. For example, the technical studies draw the following conclusions or providing the following information in relation to the abovementioned combined area:

- The subject site is not affected by existing or proposed mining activity. Similarly, the majority of the combined area is not affected by existing or proposed mining activity.
- The entire combined area is not affected by agricultural activity.
- The vast majority of the combined area is not affected by any biodiversity constraints.
- The entire combined area is not affected by any recognised flooding events.
- The entire combined area does not form part of any local or regional open space.
- The High Level Services Infrastructure Strategy by AECOM (The AECOM strategy) recommends duplicating the existing water main that traverses directly though the combined area for the purpose of serving the Wilton Junction Priority Precinct. It is assumed this duplication could also service the combined site area.
- The AECOM strategy recommends a gravity sewer line in the proximity of the combined site area for the purpose of serving the Wilton Junction Priority Precinct. It is assumed this could also service the combined site area.
- The AECOM strategy identifies an existing substation in close proximity to the combined site area. The strategy also recommends upgrading existing power supply in close proximity to the combined site area to ‘132kv feeders’. Given the combined site area is in close proximity to the proposed upgraded, it is assumed they can service the combined site area.
- The AECOM strategy generally nominates the combined site area as ‘stage 6 - Cataract’ developable area. The strategy acknowledges that Stage 6 would be the most difficult to develop due to topographical constraints, but it nevertheless recommends the area be redeveloped.
- The AECOM strategy estimates that Stage 6 would yield approximately 10,200 dwellings. This is greater than ‘Stage 3 - Gilead’ (i.e. 9,750 lot yield), and only marginally less than ‘Stage 1 - Menangle & Mt Gilead’ (10,500 lot yield). Stages 1 and 3 form part of the Menangle Park - Mt Gilead Priority Precinct, whilst Stage 6 does not form part of any priority precinct, despite the lot yields being similar.
- Assessments provided in the AECOM strategy in relation to the cost of delivering each stage (i.e. per dwelling) suggest that Stage 6 would be the least costly. For example, the cost of delivering dwellings in Stage 6 is $6,696 per dwelling, whilst the cost for Stage 1 is $15,057 per dwelling. In terms of delivery costs, this suggests Stage 6 is worthy of inclusion as part of the Wilton Junction Priority Precinct.
For reference, Appendix 1 to this correspondence provides extracts of the relevant technical studies as they relate to the subject site and the combined site area. The extracts generally reflect the itemised information provided above,

In light of the above, we see no reason as to why the subject site and the combined area should not form part of the Wilton Junction Priority Precinct. Given the technical studies suggest the combined area is developable, it would be an efficient use of research resources to include the combined site area within Priority Precinct. That is, should the combined site area be investigated for urban development purposes at a later date, all the necessary studies would have to be undertaken again, with the same conclusion likely to be drawn.

Yours Sincerely,

Carlo Di Giulio
Associate

Appendix 1 - Extract from Technical Studies
Appendix 1 – Extracts from Technical Studies

Subject site -

<table>
<thead>
<tr>
<th>Mining</th>
<th>Agriculture</th>
<th>Biodiversity</th>
</tr>
</thead>
</table>

**Mining Legend**
- Urban Capable Boundary
- Waterways
- Coal Seam Gas Well <200m Buffer
- Coal Seam Buffer District
- Coal Seam Buffer (200m Buffer)
- Proposed Mining 0-7 Years
- Proposed Mining 7-15 Years
- Proposed Mining 15-30 Years
- Coal and Power Projects
- Crushed Sandstone Quarry
- Disused Quarry

**Agriculture Legend**
- Urban Capable Boundary
- Waterways
- Land and Soil Capability 1
- Poultry Cluster
- Apiary
- Horticulture
- Perennial Horticulture
- Irrigated Perennial Horticulture
- Irrigated Perennial Horticulture
- Seasonal Horticulture (fruits and vegetables)

**Biodiversity Legend**
- Urban Capable Boundary
- Waterways
- High Constraint Biodiversity
- Moderate Constraint Biodiversity
- Ecologically Endangered Community
- Disbarking Sites (May 2015)
- VN Corridor and Priority Conservation Lands
**Sewer (AECOM report)**

![Sewer Map](image)

**Electricity (AECOM report)**

![Electricity Map](image)

**Staging (AECOM report)**

![Staging Map](image)

**Table 3.1: Proposed Stages**

<table>
<thead>
<tr>
<th>Stage Number (Progress)</th>
<th>Stage Priority Name</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Menangle &amp; Mt Gilead</td>
</tr>
<tr>
<td>2</td>
<td>Wilton</td>
</tr>
<tr>
<td>3</td>
<td>Gilead</td>
</tr>
<tr>
<td>4</td>
<td>West Appin</td>
</tr>
<tr>
<td>5</td>
<td>Menangle &amp; Douglas Park</td>
</tr>
<tr>
<td>6</td>
<td>Cabool</td>
</tr>
</tbody>
</table>

- **Stage 6**: The area between East and Wilton has been considered most constrained area in terms of developable topography making utility infrastructure difficult to provide and therefore proposed as the last stage to be developed.

Further detailed analysis of trigger points and planned development dates may alter the sequence of staging. In addition there may be alternative servicing solutions such as decentralised systems, which may affect the sequencing.
### Serviceable Dwelling Yield (AECOM report)

<table>
<thead>
<tr>
<th>Stage Name</th>
<th>Area (ha)</th>
<th>Development (Hect.</th>
<th>Potential Population (Hect.)</th>
<th>Development Yield (Hect.)</th>
<th>Potential Population Yield</th>
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</thead>
<tbody>
<tr>
<td>Menangle &amp; Mt Gilead</td>
<td>2,000</td>
<td>1,900</td>
<td>100</td>
<td>27,300</td>
<td></td>
</tr>
<tr>
<td>Wilton</td>
<td>4,200</td>
<td>2,900</td>
<td>1,500</td>
<td>22,500</td>
<td>26,500</td>
</tr>
<tr>
<td>Gilead</td>
<td>4,500</td>
<td>1,100</td>
<td>600</td>
<td>8,700</td>
<td>26,100</td>
</tr>
<tr>
<td>West Appin</td>
<td>3,600</td>
<td>2,200</td>
<td>1,400</td>
<td>10,600</td>
<td>10,700</td>
</tr>
<tr>
<td>Menangle &amp; Douglas Park</td>
<td>2,400</td>
<td>1,400</td>
<td>850</td>
<td>12,700</td>
<td>10,190</td>
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<tr>
<td>Cataract</td>
<td>1,900</td>
<td>1,100</td>
<td>600</td>
<td>10,200</td>
<td>26,500</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td>15,900</td>
<td>9,000</td>
<td>5,600</td>
<td>95,200</td>
<td>251,500</td>
</tr>
</tbody>
</table>

### Feasibility Costs (AECOM report)

- **Stage 1 – Menangle & Mt Gilead**
  - 1.5
  - Total: 158.1

- **Stage 2 – Wilton**
  - 7
  - Total: 299

- **Stage 3 – Gilead**
  - 2.6
  - Total: 138.1

- **Stage 4 – West Appin**
  - 2.1
  - Total: 147.7

- **Stage 5 – Menangle & Douglas Park**
  - 3
  - Total: 127.7

- **Stage 6 – Cataract**
  - 1.8
  - Total: 68.3

### Cost Per Dwelling (AECOM report)

<table>
<thead>
<tr>
<th>Service Infrastructure Stage</th>
<th>Approximate Dwellings</th>
<th>Approximate Stage Cost ($)</th>
<th>Approximate Cost per Dwelling ($)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>10,500</td>
<td>158.1</td>
<td>15,057</td>
</tr>
<tr>
<td>2</td>
<td>22,500</td>
<td>299</td>
<td>13,281</td>
</tr>
<tr>
<td>3</td>
<td>9,750</td>
<td>138.1</td>
<td>14,164</td>
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<tr>
<td>4</td>
<td>19,500</td>
<td>147.7</td>
<td>7,674</td>
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<tr>
<td>5</td>
<td>45,500</td>
<td>1,014.8</td>
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<td>6</td>
<td>10,200</td>
<td>68.3</td>
<td>6,608</td>
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<tr>
<td>Pre-treatment Stage</td>
<td>85,200</td>
<td>939</td>
<td>11,620</td>
</tr>
<tr>
<td>Treatment Stage</td>
<td>85,200</td>
<td>5,118</td>
<td>13,122</td>
</tr>
<tr>
<td>Ultimate Stage (including treatment stage)</td>
<td>85,200</td>
<td>2,007</td>
<td>24,143</td>
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</table>