

Dear NSW Planning Department

Re: Greater Macarthur Land Release Proposal (GMLR) incorporating the conurbations of  
Menangle/Wilton/Appin - Stakeholder Feedback

While I laud the determination of the Government to ensure the provision of more housing stock for Sydney, and as a stakeholder insofar as I am a resident of Sydney and care about its future, I offer the following feedback. I find the Greater Macarthur release area proposal, the kidney shaped area of land to be rezoned from rural to low density suburbia south of Campbelltown, to be fundamentally flawed in the following 5 areas<sup>1</sup>:

1. Its inherent contradictions
2. Its failure to account for the fundamental sea change in urban design that is occurring world wide
3. Its failure to address genuine housing needs
4. Its 88% reliance on private transport
5. The environmental footprint and its failure to account for climate change

I conclude this feedback by offering a vision of a more focused design, much more aligned with the idea of a series of more focused town centres, and a clearer distinction between rural and town areas offered by the use of spacious medium and high density homes, with the essential component being the totalistic design of the whole area, including a light rail circle line (running in some cases through the atriums of the buildings), bike paths, and a conception of the whole town in terms of street and building aesthetics and internal layouts, which I recommend to be at least 50% more spacious than the State Government minimum, which is considered by many to be too shoebox-like. I also offer similar points as a set of general directions that I believe Sydney needs to follow.

### **1. Its inherent contradictions – three of them**

1) We are told that this land release will provide much needed housing for Sydney. Then we are told that this urban release is stand-alone town / growth area in its own right, not connected with Sydney, and therefore it cannot be termed suburban sprawl.

These two statements are mutually contradictory. Either there is a whole new town the size of Bathurst to be built, or it is part of the suburbs of Sydney. Building a town the size of Bathurst directly adjacent to the south of Campbelltown LGA will inevitably by the laws of economics create an impetus towards conurbation and connection of the two areas. So while this housing release that will be apparently servicing the housing needs of Sydney but at the same time be a town in its own right, will in the end ultimately end up being part of Sydney. So effectively what is occurring is the delivery of suburban sprawl of Sydney 80 km away from the CBD. It is not possible to avoid Wilton become a de facto part of Sydney's sprawl because of the effect of conurbation, where the fringes of the two suburban areas will meet, separated by barely a few token kms of rural land in between, and finally conjoin. This is inevitable.

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<sup>1</sup> I do not include information of a geotechnical nature with respect to CSG or other mining, on which I am not qualified to comment, only to speculate that CSG activities should not be going ahead during a time of climate change, and certainly CSG and long wall mining around and under a township would be a very odd decision indeed.

So to put that in perspective, that is the equivalent of London breaking through the Green Belt, and extending housing all the way to the south coast and the outskirts of Brighton, and covering the entire South Downs in low density suburban sprawl in between. It would mean the entirety of South-East England would be low density suburban sprawl.

2) Secondly, we are told that the 7,700 ha land release, comprising low density suburban sprawl, will not impact on the rural nature of the area. How is that possible? This is again an exercise in contradiction, of entertaining two mutually exclusive ideas at once. It is not possible to retain the rural qualities of an area and to at the same time rezone it for low density suburban sprawl any more than it is possible to build a coal mine and an international airport on the same plot of land. While rural farms do exist inside urban areas, their operations are compromised, and they still require a fairly sizeable exclusion boundary to ensure that livestock and other operations are not interfered with.

3) Consequent to these two contradictions, we are also told that this will not add any more traffic to Sydney, despite the study revealing an 88% reliance on private transport. Unfortunately, like it or not, people already travel from the Southern Highlands to jobs in the CBD by car. Jobs are most plentiful in the CBD, and the lion's share of public transport rail infrastructure is directed straight at the CBD. This means that there is a pre-existing incentive for employers to set up shop in the CBD, where workers can easily access their workplace with a (fairly) reliable train service. Jobs will always be generated within the bounds of the Sydney metropolitan region – therefore people will need to travel there. Not all of them choose the poorly serviced Southern Highlands service.

While a few jobs will be created locally – mainly in the service industries, servicing the very population that is to be created, which is a circular way of making jobs – there will be little incentive for major employers to relocate to this area. So that means that there will be a sizeable amount of people commuting to Sydney – as there are now from the Southern Highlands. Because of the poor train connections from the Southern Highlands, they travel by car.

Inevitably, the M5 will once again need to be widened.

This is a very poor outcome in terms of poor quality of life, traffic management, and lost productivity and efficiency.

## **2. Its failure to account for the fundamental sea change in urban design that is occurring world wide**

The proposal does not account for the densification of cities that is occurring around the world. Sydney is one of the most sparsely populated cities in the world. It is characterised by its country town urban design qualities, with its low density stand alone housing of one and sometimes two storeys, and its electricity power poles everywhere. By all accounts, such qualities are perfectly fine for a country town, but for a major State capital city, the second largest in Australia and a major driver of the NSW economy, this is a poor outcome.

In general, cities should be at the approximate height of a fully grown mature tree, with the corresponding density that such a height allows. This means that housing needs to be roughly between around 4 to 8 storeys, be they in the form of terraced housing, rows of houses of other designs, or apartments. This is the natural human scale for cities ever since the ancient Romans built their capital and major cities. These are dimensions

that you will find in the great capital cities of Europe that attract billions of Euros of tourist money into their economies, and have a thriving cultural and civic life.

Sydney looks nothing like this. It remains largely a country town. The GMLR does nothing to remedy this situation – it in fact entrenches the existing paradigm. The GMLR simply perpetuates an inefficient, asocial and uneconomic model of urban design, continuing on in a business-as-usual fashion inherited from Landcom fringe releases that occurred in the 90s, and an approach that has been relied on since the 1950s.

The model of urban design offered by the GMLR proposal in its current incarnation – low density, car-reliant - is a failure. It results in

- huge ecological footprints, with consequent impacts on the local ecology, sustainability and air quality
- car-based, car-dependent transport
- social isolation
- inefficient home-to-work commuting patterns
- lack of access to amenities
- lack of cultural critical mass
- the prevention of public transport viability

The proposal as it now stands should be rejected in its failure to take into account current densification and urbanization patterns, and the move away from private transportation that is occurring across the world.

### **3. Its failure to address genuine housing needs**

Genuine housing needs should provide the following to its inhabitants. Housing should:

- Be of such a density that it allows friends to visit one another without needing to get in a car
- Be of such a density that it allows people to access common, social spaces without needing to get in a car.
- Be located near permanent public transport infrastructure (i.e. rail) which does not need to be accessed by any more than a 20 minute walk.
- Be spacious – with a minimum internal floor area of 100m<sup>2</sup> for 2 bedrooms, and 50m<sup>2</sup> per bedroom thereafter.
- Be differentiated from its environmental context and conforming with its urban design context – that means there should be a particular style to the urban design area that is cohesive, and that there are clear differences between areas of parkland, of social spaces and of housing accommodation.
- Be both functionally and aesthetically designed
- Provide acoustic and visual privacy

The kinds of low density housing that is proposed for the majority of the 7,700 ha of the GMLR proposal is of a kind that meets none or almost none of these criteria. It is also noted that low density sprawl is no guarantee of acoustic or visual privacy either.

Therefore the GMLR proposal fails to meet genuine housing needs because it fails to meet core human social needs.

#### **4. Its 88% reliance on private transport**

I quote from page iii of the pdf document “greater macarthur land release Investigation strategic transport plan 2015 10 21” prepared by AECOM Australia Pty Ltd:

A majority of the transport task will be undertaken using private vehicles, with approximately 88% of the mode share. Public transport utilisation for the GMIA will be relatively modest at around 12% of the mode share. These above mode shares are consistent with that currently observed in other Western Sydney LGA's such as Campbelltown.

The GMLR again perpetuates the failed car-based model of urban design. The LGA of Campbelltown is currently suffering from gridlock on Narellan Road as well as other roads, which are a product of exclusive reliance on the private motor car, which is baked into the urban design of Campbelltown.

The GMLR plans to replicate that failed model. In addition, as noted above, there is no guarantee that traffic will not spew onto the Hume and M5 in the attempt of residents to drive into Sydney CBD, or nearby. Human beings need to connect and congregate with each other, and they need to experience some form of cultural activity beyond sitting in front of a flat screen television. The GMLR perpetuates private transportation, and at a figure of 88% reliance on the car, this is an indictment of the low density sprawl model that is proposed, given that 88% of people will need to use their car to get out of the various cul-de-sacs and low density suburbs.

#### **5. The environmental footprint and its failure to account for climate change**

In effect, what makes Sydney such a beautiful city – its environment – is here being targeted and destroyed. The very thing that makes Sydney an attractive location for habitation is being destroyed in this land release for that very habitation. While I am not suggesting that all green areas around Sydney be quarantined (the reverse, they should be set out as national parks and infrastructure provided to allow citizens and tourists to visit and enjoy them more frequently than is the case now) the preservation of the essential ecology of Sydney – its farmland, bushland and open fields - is absolutely imperative to the future of the city.

The proximity of the proposed areas of Mount Gilead, Appin, and Wilton to Cataract Dam and Sydney's water supply is also a cause for concern.

The green areas of Sydney act as a producer of Oxygen, a cleanser of pollutants from the air, and a cooling and humidifying influence on the local climatic conditions. With the proposed acres and acres of stencilcrete driveways and stormwater drains funneling masses of rainwater directly into local storm water drains and away from the ground, we will see an exacerbation of the heat island effect resulting from the GMLR proposal which will have further effects on the greater Metropolitan area. There is furthermore no consideration given to a worst case scenario with respect of climate change, although its location high above sea level is to its credit in this instance.

## **GMLR: Principles for an Alternate Proposal at Wilton / Douglas Park – medium/high density and the ‘string of pearls’ automated light rail.**

There are two proposals here.

PROPOSAL 1. My preferred option would be that the GMLR not go ahead at all in any form until the core principles of urban design as contained in the second proposal as outlined below are applied first to the retrofit the rest of Sydney from the Inner West out to the M7. This would raise the density of the Greater Metropolitan Sydney area by around 3 – 4x, thereby making the need for such suburban sprawl as the GMRL area represents unnecessary. This would be my first preference.

PROPOSAL 2. The second proposal is for the GMLR area to go ahead under the form outlined below. It is proposed here that a completely different model of urban design and release be taken on. The GMLR area is a great opportunity to break a habit ‘draw up individual lots, flog off to developers and walk away’ of the last 70 years and to build and design in a more totalistic way. That means having a concept of what the whole will look like, and to build each and every element as a complete whole. It also means delegating to a team of expert and accountable planners, while retaining ultimate responsibility.

This is the opposite of pouring the bitumen roads, bunging in some power, water and cable, ruling up the land into blocks, and then letting the developers loose on it to build endless McMansions, while walking away and wiping your hands of the whole scheme. Who for instance is accountable for any of the Sydney land releases over the past 20 years? No-one knows. They may as well have been designed and signed off by robots for all we know.

What is here proposed is a bolder, more accountable and more inclusive model. It is proposed that the State government, in consultation with locals, planners, developers, transport experts and builders, design the whole area from the ground up to the final product. This means deciding on the aesthetic look and qualities of all the suburbs and streets that would make up the GMLR, and applying conscious intelligence to the process. Such a holistic approach would not be rigid or dictatorial in a communist or centralist-like way. It would still involve considerable flexibility and freedom at each stage, as each stage is reached, but it would involve the State planning department – in direct and accountable consultation with all stakeholders and the wider public – directing and choreographing the entire process in a more pro-active way, aligning the various stars of architects, town planners and builders in a holistic orchestration.

For this reason, given that it is proposed that the GMLR area is to be a stand-alone town, I would propose several major changes in line with 21<sup>st</sup> best urban design practice. These are:

1. That the environmental footprint is about ¼ of the current size.
2. That the density is correspondingly 4x the current density, and that density conforms to standard world’s best practice for urban areas – generally between 4-8 storeys.
3. That light rail is built connecting all parts of the GMRL area with each other and with the two closest stations on the Southern Highlands line in a circle line (see map). That is, Maldon, the Hume Hwy, Wilton and Douglas Park are connected together with a bi-directional driverless circle line light rail system, that interconnects with the Southern Highlands line (see map)

4. That the Southern Highlands Line is as a consequence electrified to Bowral, and express services deliver customers to the CBD within 70 minutes with the stopping pattern Maldon – Douglas Park – Macarthur – Campbelltown – Glenfield – Revesby – Sydenham.
5. That cycle paths link those same areas as well as a central parklands and a route along the Nepean river between Douglas Park and Maldon
6. That there is high rise built next to the stations at the central points of Wilton, Douglas Park and Maldon, of an aesthetic design, reflecting the values of the area, and proudly visible from afar.
7. That some of the high rise be iconic &/or innovative. For instance, CLT builds allow for considerable height to be achieved, creating unique high rise structures out of wood.
8. That developers pay for the above infrastructure.
9. That existing landowners gain considerable value-adding (aka profit) from the higher density proposed.
10. That housing be at least 50% more internally spacious than the minimum requirement for apartments.
11. That fibre to the home is installed throughout the areas
12. That developers pay the lion's share for the creation of infrastructure, given the increased height allowances, which gives them economy of scale.
13. That areas that would have been zoned low density, that go to the fringe of the woodland areas to the south and West of the Cataract Dam and Georges Rivers, be tailor made parklands, and a green belt buffer to the woodland and sensitive bushland areas.
14. That the State Government monitor, feedback, direct and submit quarterly reports on the progress of the project.

In general, this means that densities are compressed to allow for the critical cultural mass to occur that makes the car obsolete within the neighbouring area of the release. Note that residents could still own a car, and they could still use their cars to travel to the beach or to Canberra or to anywhere else. But travel within the GMLR would be enabled through a single PT automated light rail line that connected both sides of the release area on both sides of the Southern Highlands railway line with the two stations of Maldon and Douglas Park (see map), entirely integrating the growth region with a baked-in PT network, and obviating the need for a car. Note that the separation of areas into the 'pearls' is not following the Canberra model, which had low density and separation. This is separation and connection via automated light rail (the 'string') and medium and high density (the 'pearls').

Medium rise of 4-8 storeys of spacious terraces, rows of houses, and apartments, with cutting edge design and amenities would characterize 90% of development.

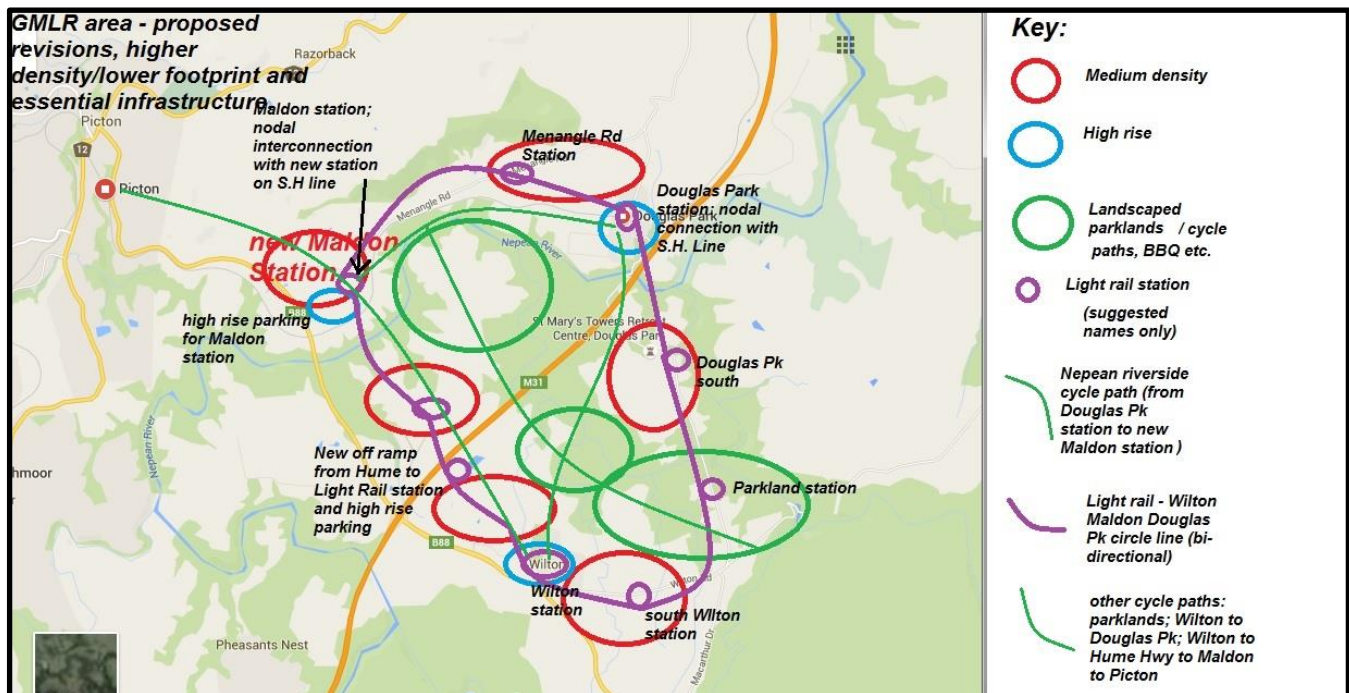
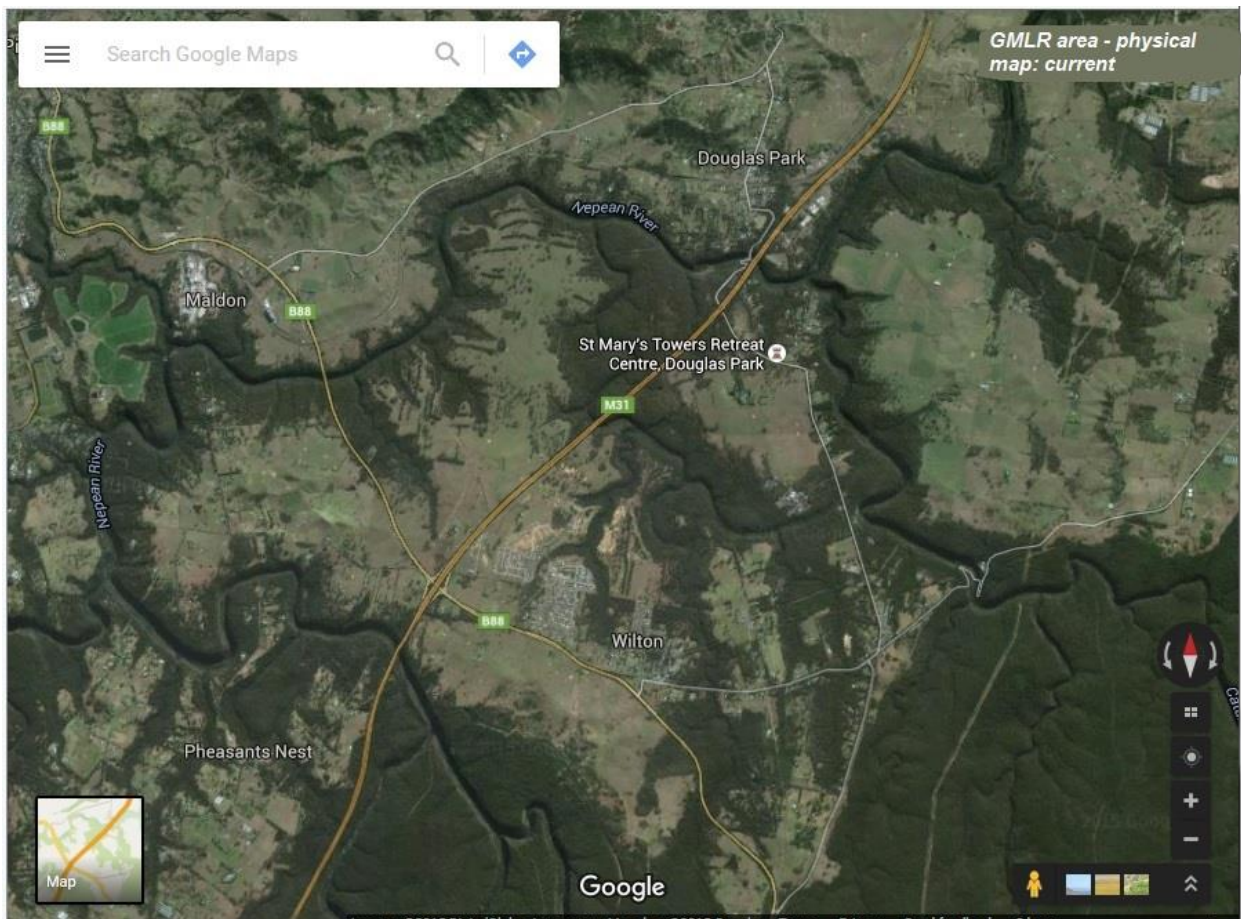
High rise next to Wilton light rail station, and Douglas Park and Maldon would characterize the remaining 10%.

Extensive and accessible public parklands. There would be no low density suburban sprawl. Instead the areas that would have been coated with stencilcrete driveways and McMansions would be given to parklands immediately adjacent to the low density areas.

Light rail connects all Medium and High density areas in a 'string of pearls'. This is automated and arrives every 3 minutes.<sup>2</sup>

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<sup>2</sup> A future rail corridor to the coast via rail is also envisaged, possibly using the existing infrastructure of the discontinued Maldon-Dumbarton line.



## **Overall aspects of the design**

Essentially the proposal here is radically different from the approach to land releases over the last 70 years. This would mean firstly and foremostly that there would only be high and medium density and parklands – no low density suburban sprawl. Secondly it would mean that light rail infrastructure, cycle path infrastructure and fibre optic to the home is designed into the original design. Thirdly, it would mean State Government project management from go to woe would be involved, ensuring the quality of the project is not compromised. This means that we will know what each street and building and room will look like before the first cow has been herded off the land, before the first chicken coop is dismantled.

It is hoped that the buildings themselves would be examples of aesthetic and functional excellence, as well as design excellence in the areas of internal flow, corridor width, safety of balconies, capaciousness, and acoustic and visual privacy.

It is hoped that given the higher densities proposed, that a larger community may be able to be accommodated than the proposed 33,000.

It is hoped that in the short term fast trains would service direct routes to the CBD with greater use made of the limited stops service on the quadruplicated lines at Revesby, and in the long term, connections with a HSR stop at Campbelltown direct to the CBD would be envisaged.

All of these interconnecting lines of transport and information would ensure the success of the project as a whole, and the creation of a unique place for people to co-habitate.

This proposal offers a change in direction from more suburban sprawl which has been forced on Sydney residents whether they like it or not. We have the 21<sup>st</sup> C technology to now be able to do something different. Why repeat the past model?

I submit this feedback and this proposal for the GMLR area for consideration to the NSW Department of Planning and the Environment

Sincerely,

*Yanis Garrett*

Yanis Garrett