

Our Ref: 151117L\_GMLRI submission



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17 November 2015

The Secretary  
Department of Planning & Environment  
23-33 Bridge Street  
SYDNEY NSW 2000.

Dear Madam

**RE: GREATER MACARTHUR LAND RELEASE INVESTIGATION – SUBMISSION ON BEHALF OF INGHAM PROPERTY GROUP**

## **1.0 Introduction**

This submission has been prepared on behalf of the Ingham Property Group in response to the recently released Greater Macarthur Land Release Investigation (GMLRI) area.

The GMLRI aims to address current housing supply and affordability issues being experienced in Sydney Metropolitan Region. As part of this work, the Department of Planning & Environment (DP&E) has led investigations into the potential for urban development in the Greater Macarthur area.

The work undertaken has "identified land that is suitable for urban development, the infrastructure required to support growth, and how Greater Macarthur would be connected to jobs and other services in other parts of metropolitan Sydney." (DP&E 2015).

As part of the GMLRI, two Priority Growth Areas have been identified, being Menangle Park & Mount Gilead and Wilton. The Ingham Property Group landholding has not been included in the Priority Growth Areas, despite being Urban Capable land and Ingham Property Group having the financial capacity and proven track record in South West Sydney of being able to deliver housing and associated infrastructure.

The landholding has also been incorrectly described as a "Poultry Cluster" in the documentation. The existing poultry sheds will be decommissioned in the near future as discussed further in Section 5.3 below.

This submission seeks to include their land within the proposed Menangle Park & Mount Gilead Priority Growth Area, in addition to other strategic outcomes.

Ingham Property Group is excited and supportive of the positive steps being taken through the Government's initiative, however an opportunity has been missed in the further provision of priority housing supply within the region by excluding their landholding.

The site can be easily integrated into the Menangle Park & Mount Gilead Priority Growth Area. Development of the site will provide a community benefit by facilitating greater housing supply and improving housing affordability within the region. The inclusion of an additional 3,000 lots will assist Government to make infrastructure provision more affordable and also ensure there are several developments offering housing supply to meet demand.

An assessment of the GMLRI documentation and the subject site has identified the following key benefits associated with the inclusion of the subject site, which:

- Represents a logical continuation of urban land and natural boundary to the Priority Growth Area.
- Is a large scale land holding capable of delivering up to 3000 dwellings as part of an initial release area.
- Ingham Property Group have a proven track record in being able to deliver housing and infrastructure in a timely fashion in release areas within South West Sydney.
- Can be developed independently and serviced easily by the proposed infrastructure upgrades resulting from the GMLRI and private proposals within the surrounding area.
- Is suitable for development and is not constrained or encumbered land.
- The site is separated from Appin Village by a substantial Creek and therefore will not impact the rural village.
- The existing poultry operation is scheduled for closure in the short term and the site will be returned to its natural state as a vacant parcel of land.

Ingham Property Group are committed to delivering a new community with all the necessary facilities and services on their landholding within the Greater Macarthur as a priority to assist the Government with land supply for a growing Sydney.

It is critical to the success of the GMLRI that the Priority Precincts incorporate a number of large landholdings in order to immediately boost land supply, address land cost/affordability issues in South West Sydney and maximise opportunities for early infrastructure funding for the area.

We have provided a detailed discussion below which demonstrates that the inclusion of the Ingham Property Group landholding within the Menangle Park & Mount Gilead Priority Growth area is a logical extension of the urban area and provides significant short and long term benefits to housing supply and infrastructure delivery within the region.

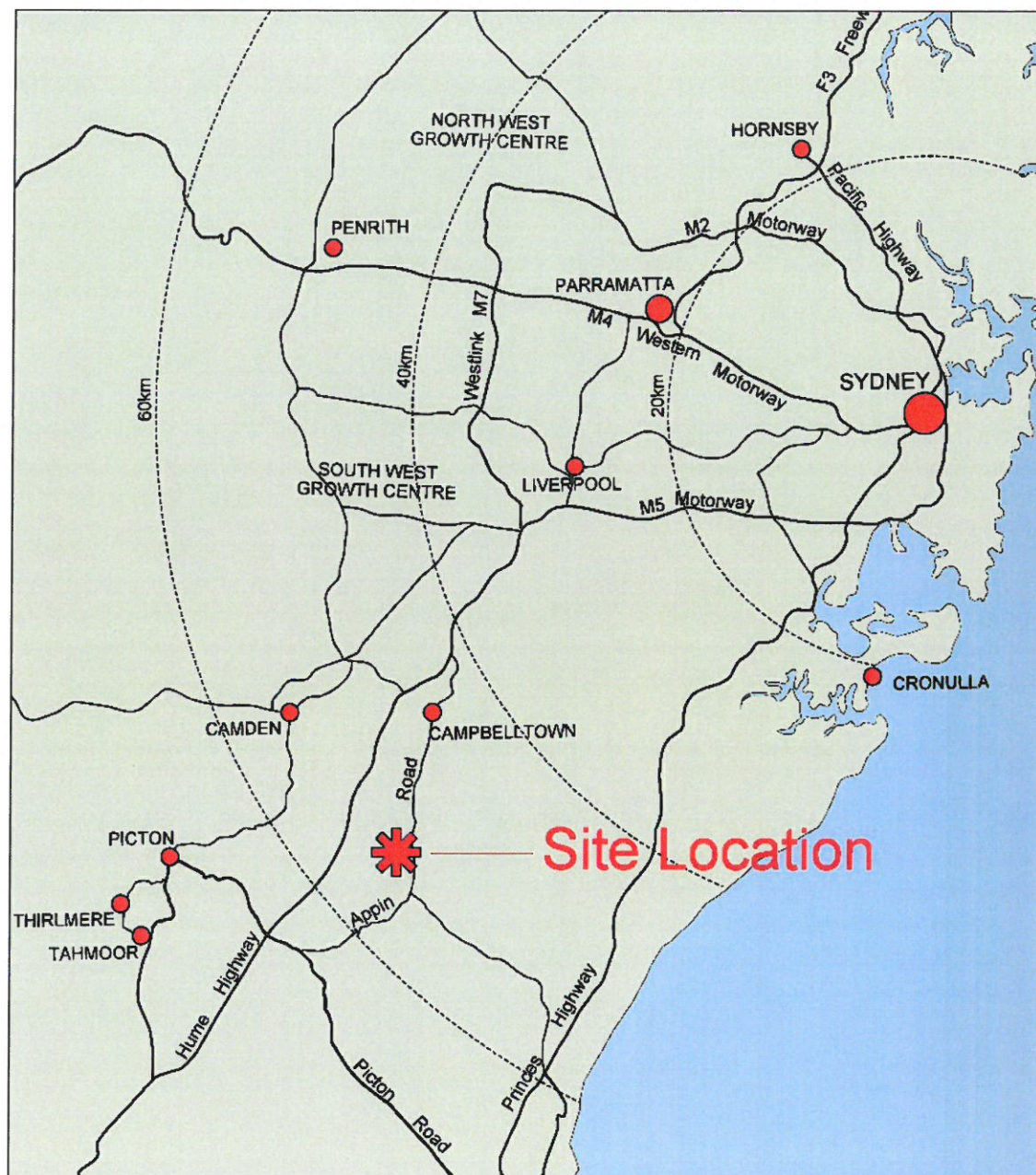
## **2.0 The Subject Site**

The subject site is identified as Lot 100 DP1045694 and is in the sole ownership of Ingham Property Group. The property is located on the western side of Appin Road, south of Gilead and north of Appin Village. The site is bound by private land holdings to the north, the Upper Canal to the west and Appin Road to the east. The property is approximately 300 hectares in size and is primarily located within the Wollondilly LGA, however a small portion of the site is within the Campbelltown LGA. The site is zoned RU2 under the Wollondilly LEP 2011.

The site is generally clear of vegetation and has been historical used for agricultural grazing and poultry farming over several decades. A poultry farming facility currently exists at the site operating from 6 farming units. This operation is due to cease within the next few years and all farming units will be removed returning the site to a vacant lot.

The north western portion of the subject site forms in part the boundary of the Menangle Park & Mount Gilead Priority Growth Area, which is aligned along Mallaty Creek.

Figure 1: Locality Plan





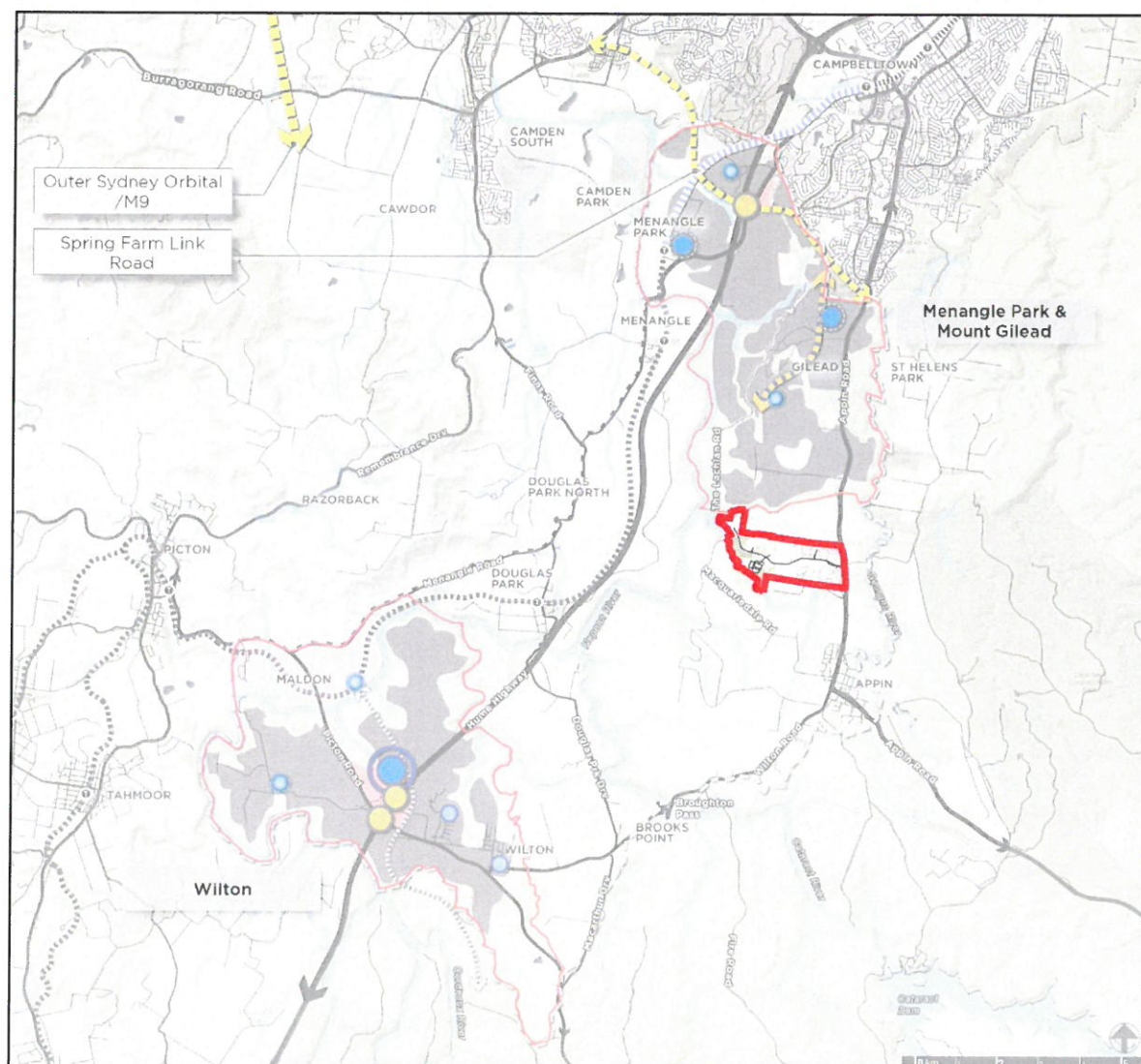
### 3.1 Priority Growth Areas

The Government has identified the capability to deliver 35,000 homes within the investigation area. Two Priority Growth Areas have been established to facilitate the early delivery of housing within the investigation area - Menangle Park & Mount Gilead and Wilton.

The Department of Planning and Environment is promoting the following process to implement the vision for Greater Macarthur:

- Amend the State Environmental Planning Policy (Sydney Region Growth Centres) 2006 and include Menangle Park, Mount Gilead and Wilton as Priority Growth Areas.
- Investigate declaring Menangle Park, Mount Gilead and Wilton as Special Infrastructure Contribution Areas.
- Continuing to work closely with Wollondilly Shire Council, Campbelltown City Council, and NSW Government agencies to deliver new communities with homes, jobs, infrastructure and services, while protecting the environment and natural resources.

**Figure 4: Greater Macarthur Vision to 2036 and subject site.**



The subject site adjoins the southern boundary of the proposed Menangle Park and Mount Gilead Priority Growth Area. The subject site is to the north of Appin Village and is separated from Appin by the Ousedale Creek environs. As demonstrated in Figure 4, the north western portion of the subject site forms part of the boundary of the Menangle Park & Mount Gilead Priority Growth Area, which is at present aligned along Mallaty Creek.

GMLRI Preliminary Strategy has identified areas outside of the two Priority Growth Areas as having development constraints, though longer term development potential. This is not the case for the Ingham Property Group Landholding, as the land is free of the constraints identified.

#### **4.0 Proposed Inclusion of the Subject Site**

An analysis of the subject site against the key heads of consideration as set out in the GMLRI documentation and supporting studies demonstrates the following benefits which would result from including the site within the Menangle Park & Mount Gilead Priority Growth Area:

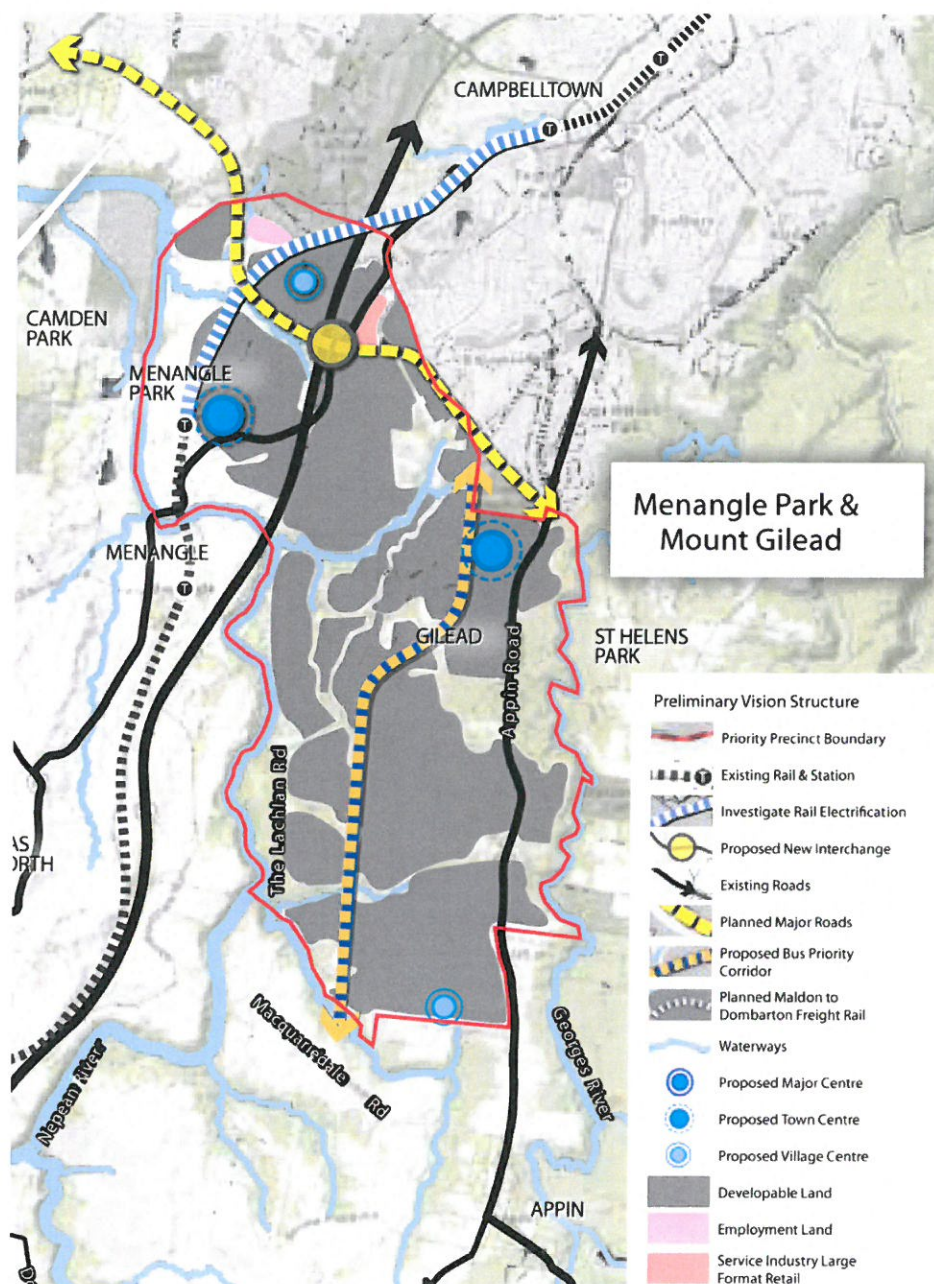
- The existing poultry farm is scheduled for closure and the poultry sheds removed (expected either on or before 2019).
- The site has therefore been incorrectly identified as being within a Poultry Cluster.
- The site is suitable for development and is not constrained or encumbered land.
- The north western portion of the subject site borders the Menangle Park & Mount Gilead Priority Growth Area, and as such the subject site can be easily integrated as a Priority Growth Area.
- The site is a logical continuation of urban land and can be developed independently.
- The site is separated from Appin Village by a substantial Creek and therefore will not impact the rural village.
- Site can be serviced easily by the proposed infrastructure upgrades resulting from the GMLRI and private proposals within the surrounding area.

The landholding is urban capable and can be easily integrated into The Menangle Park & Mount Gilead Priority Growth Area. This will greatly contribute to the capability Greater Macarthur Region delivering timely housing supply within Sydney. Development of the site will provide a community benefit by facilitating greater housing supply and improving housing affordability within the region.

As such, we request that the Priority Growth Area Boundary be amended to include the subject site through inclusion in the proposed Menangle Park and Mount Gilead Growth Centre Boundary. This can be facilitated by adjusting the proposed boundary to be aligned along Ousedale Creek to include the additional urban capable land within the subject site.

The amended Priority Growth area boundary as proposed under this submission maintains an existing "rural" land use buffer to Appin Village to the south, enabling more detailed Structure Planning to be undertaken in the future. Ousedale Creek represents a logical boundary for the delivery of a Master planned community as part of the Menangle & Mount Gilead Priority Growth area.

Figure 5: Proposed Vision Plan



We also request that the Department of Planning amend the boundary of the 'developable land' to reflect the area shown in Figure 5. While we anticipate that the boundaries of the developable land will be more accurately defined during Precinct Planning based on more accurate specialist investigations and mapping. The proposed boundary as shown in Figure 5 represents a more accurate site outcome.

Consideration of the subject site against the key heads of consideration has been provided below in order to demonstrate the merit to amending the proposed priority Growth Centre to include the subject site.

## 5.0 Key Heads of Consideration

### 5.1 Biodiversity

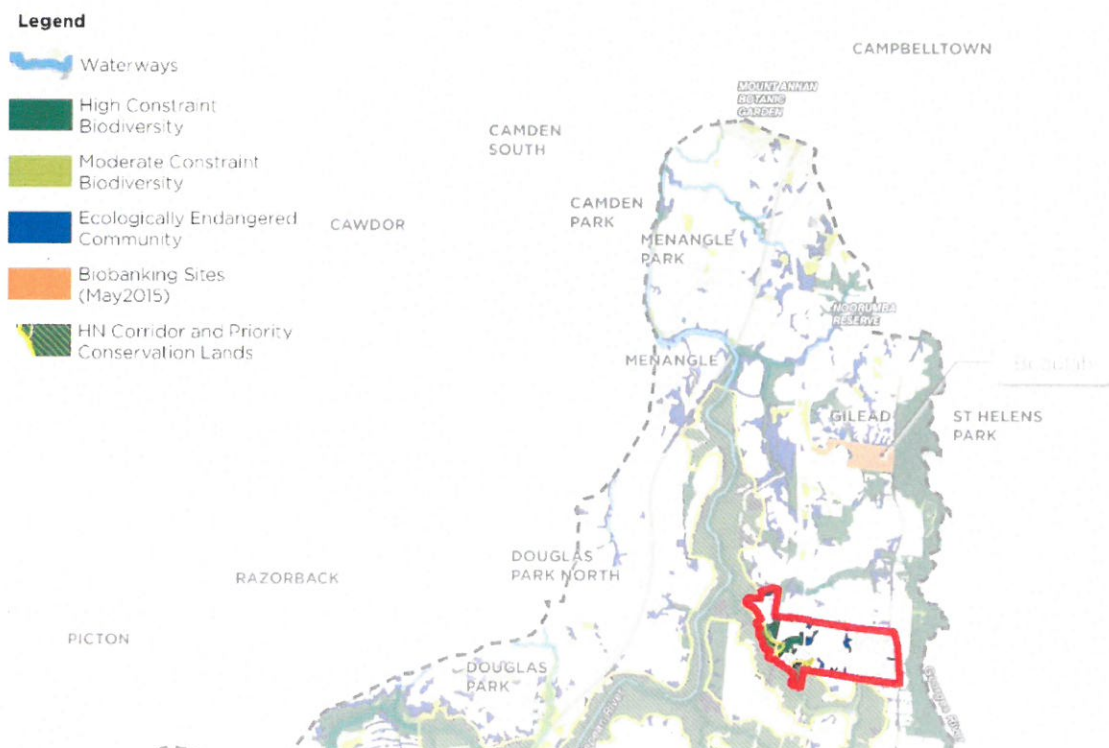
Biodiversity Mapping has been undertaken as part of the preliminary Greater Macarthur Land Release investigations. The mapping identifies areas of high and moderate biodiversity constraint. The mapping also identifies specific areas such as: Bio-Banking Sites, Hawkesbury Nepean Corridor and Priority Conservation Lands.

The majority of the subject site subject site has not been identified as having high or moderate biodiversity constraint. The site is generally clear of vegetation and has been used historically for agricultural activities, namely poultry farming. A small pocket of Ecologically Endangered Community has been identified in the Biodiversity mapping as demonstrated in Figure 6. The western portion of the site has been identified as having high to moderate biodiversity constraint.

These areas are a minor portion of a much larger site and as such do not render the site unsuitable for development. The quality of this identified biodiversity constraints will require further investigation and can be adequately dealt with as part of the rezoning process.

Furthermore, inclusion of the site in the priority Growth Area will allow for a consistent approach to management of the Hawkesbury Nepean Interface, which borders the subject site and the Menangle Park & Mount Gilead Priority Growth Area.

**Figure 6: GMLRI Biodiversity Constraints Plan and subject site.**

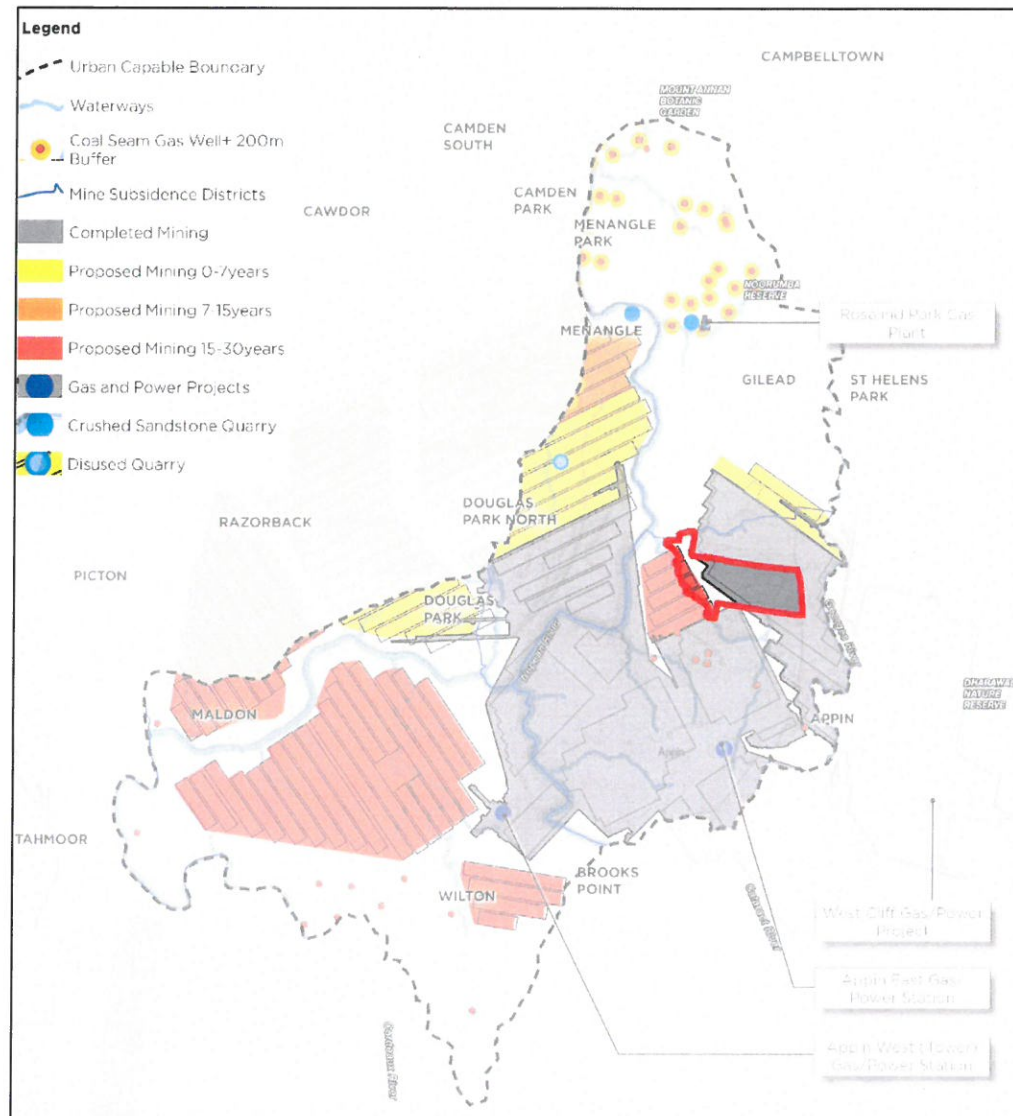


## 5.2 Mining

The GMLRI Preliminary Strategy & Action Plan outlines that mining in the southern portion of the Growth Centre/Precinct will need to demonstrate that they comply with the relevant rezoning pathway steps.

The site has been identified as Completed Mining. Additionally, no Coal Seam Gas or mining activities are likely to occur within 200m of the subject site. Given that mining activities within the surrounding area have ceased mining is considered to have no impact on the suitability of the site for development. Importantly, this makes the site eminently suitable for urban development.

**Figure 7: GMLRI Current and Proposed Mining Activity and subject site.**



### 5.3 Agriculture

#### ***Poultry Cluster & Land & Soil Capability***

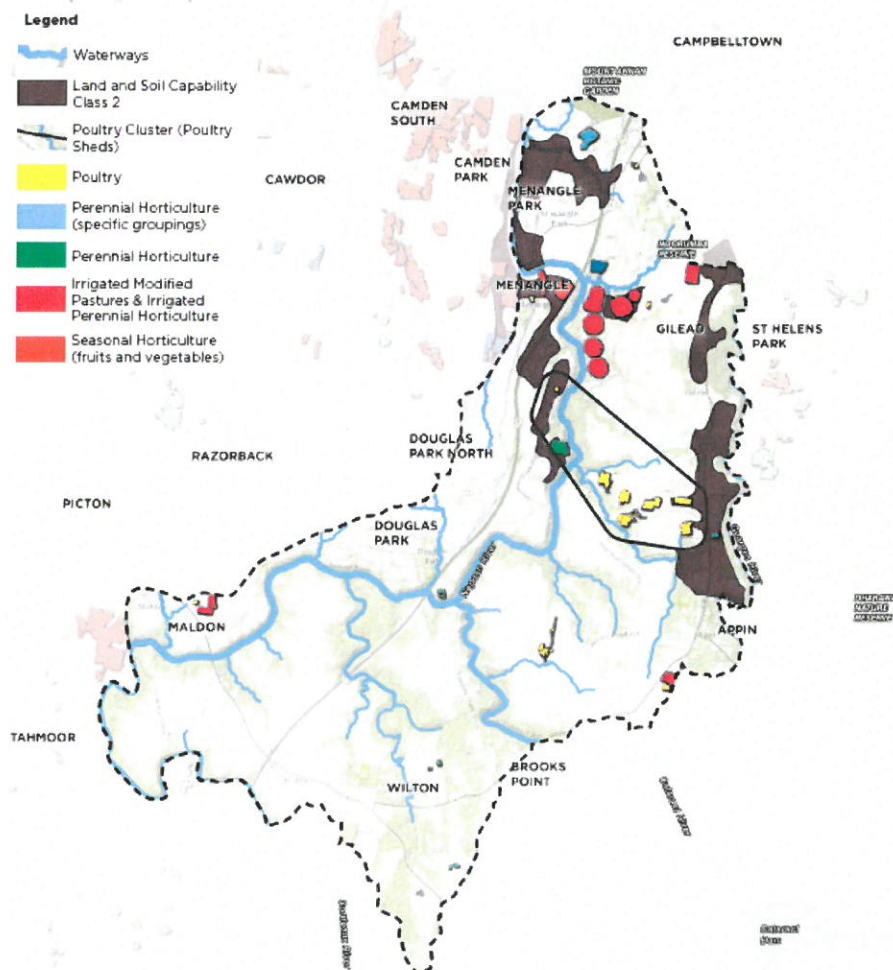
The site has been identified as incorporating Class 2 under the Land and Soil Capability Assessment Scheme (refer to Figure 7). The subject site has incorrectly been identified as a Poultry Cluster under the GMLRI.

A poultry farming facility has been in operation on the subject site for almost 50 years. The facility is owned by Ingham Property Group which is leased and operated by Inghams Enterprises Pty Limited (non-related company owned by TPG). The site contains 96 broiler sheds within 6 farming units. The poultry farming facility is considered to have reached the end of its economic life and is surplus to requirements. The lease arrangement is scheduled to terminate on or prior to 2019. Due to the age and nature of the facility it would not be considered viable by new processors as it is no longer desirable to have such a large concentration of birds in one location, together with the fact that the farms do not meet current industry standards and the cost to retrofit would be cost prohibitive. Furthermore, it is a condition of the lease that the tenant demolish and remove all improvements from the site upon expiry of the lease.

Agricultural activity at the site is otherwise marginal and as such the agricultural value of the site is low.

Accordingly, we request that the error in the GMLRI be corrected and the Poultry Cluster annotation be removed from the Ingham Property Group landholding. The subject site should be classified as developable land and included in the Menangle Park and Mount Gilead Priority Growth Area.

***Figure 7: GMLRI Poultry Cluster & Land & Soil Capability Plan and subject site.***



#### 5.4 Landscape Character

An assessment of land character has been undertaken as part of the initial investigations of GMLRI to identify land suitable for development. The site has been classified as 'Open Pastoral Uplands'.

The characteristics have been identified as follows:

- Elevated areas with few if any trees
- Extensive clearing and highly altered landscapes
- Minimal topographic variation

Given the historic use of the land for agricultural grazing and poultry farming the site is unlikely to provide contribute to the regional landscape character. The sites identification as Open Pastoral Uplands demonstrates there is little landscape value. The site is therefore considered to be eminently suitable for urban development.

#### 5.5 Heritage

Both indigenous and non-indigenous sites of significance have been identified and mapped within the GMLRI.

##### **Indigenous Heritage**

Potential and known areas of Indigenous Heritage have been identified throughout the Macarthur region and mapped accordingly. This includes tribal areas, camp sites, waterways, buildings, landscape items and artefacts. The Nepean River is the closest area of Aboriginal significance and has been identified as an area "Known to Aboriginal Communities to be rich in art and camp sites".

The site has not been identified as containing any sites known of cultural value. The sites suitability for development is therefore not encumbered by indigenous heritage.

##### **European Heritage**

State and Local Heritage items have been identified throughout the Macarthur region. The Upper Nepean Scheme - Upper Canal runs through the region from Mount Annan through to Wilton, running through both Priority Growth Areas. This canal is listed on the State Heritage Register.

The subject site does not comprise any items of European cultural heritage. The Upper Canal runs along the western boundary of the site. Identification of this adjoining heritage item allows for future planning of development within the surrounding area and does not impact the suitability of the site for development.

#### 5.6 Overall Servicing Review

The GMLRI mapping illustrates the location of existing and proposed infrastructure for servicing connections. Existing servicing infrastructure throughout the region exists primarily in existing and current semi-rural developments.

The following existing and proposed infrastructure is of relevance to the subject site and its inclusion as a priority site:

- The Indicative Water Infrastructure Augmentation and Upgrade Plan identifies an existing watermain running through the site.
- A watermain is also proposed along Appin Road. A new pumping station is proposed at the intersection of the Campbelltown and Wollondilly LGA Boundary and Appin Road.
- A gravity main has been proposed to the north of the subject site, just north of Mallaty Creek. An extension of this main further south will enable further developable land to be serviced.
- A substation has been proposed to the north of the subject site just south of Mallaty Creek which will assist in servicing the development of the subject site.

The Ingham Property Group is supportive of the proposed infrastructure upgrades and proposes the extension of proposed gravity main to the south to service developable land at the subject site and further south amendment and ensure a better outcome and efficient use of proposed infrastructure upgrades.

### *5.7 Road Infrastructure & Bus Routes*

The Ingham Property Group is in supportive of the road upgrades within the surrounding localities such as Spring Farm Link Road and the Hume Highway.

The proposed Link Road between the Hume Highway and Appin Road will greatly assist servicing existing urban development within the region and relieve pressure on the road network. This will improve the efficiency of the road network surrounding the subject site and within Campbelltown substantially.

#### **Appin Road Upgrade**

Appin Road which runs north-south along the eastern portion of the site and provides a connection from Campbelltown to Wollongong and will initially be the primary access to the subject site. Appin Road is proposed to be upgraded from a two lane arterial road to a dual carriage way (4 Lane) between Rosemeadow and the southern extent of the precinct. The proposed upgrade will greatly assist in servicing the development of the site.

#### **Bus Priority Corridor**

The GMLRI Preliminary Strategy identifies a 'Proposed Bus Priority Corridor' which runs through the Mount Gilead landholding towards the southern portion of the precinct terminating at a proposed Village centre in the south of Gilead. The Ingham Property Group support this proposed corridor and see the following merits in its extension further south:

- The extension can be easily extended further south without impacting highly constrained land,
- The extension will service future development to the south including the subject site,
- This will assist to relieve pressure from Appin Road, and
- Will lead to the creation of highly connected and sustainable urban areas within the region.

Accordingly, we propose that all documentation which identifies the 'Proposed Bus Corridor' within the GMLRI be amended to depict an extended strategic corridor as shown in *Figure 5 – Proposed Vision Plan*.

### *5.8 SIC Funding Arrangements*

The GMLRI Preliminary Strategy & Action Plan outlines that prior to rezoning an appropriate mechanism for infrastructure need to support growth will be required. The documentation acknowledges that the preferred mechanism is a Special Infrastructure Contribution (SIC), or alternatively planning agreements between the Minister for Planning and respective proponents.

To maintain affordability within the Greater Macarthur region, Ingham Property Group support the government initiative to establish a SIC, similar to the existing Growth Centres, that provides equitable contribution towards reasonable regional infrastructure items. Ingham Property Group also support the ability to negotiate delivery of reasonable infrastructure items through 'Works in Kind Agreements' with the Minister for Planning and relevant proponents.

### 5.9 Priority Precincts

The site has been assessed below against Action 2.4.2 for inclusion as a Priority Growth Area.

#### ***Menangle Park and Mount Gilead Assessment against Action 2.4.2***

| Issue to be Considered                                                                                                            | Assessment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|-----------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>The value of land for drinking water supply, agriculture, environmental management, resources, tourism and other purposes.</b> | The subject site has been historically used for poultry farming (which will cease in the short term) and rural grazing. As such the majority of the land is mostly cleared and has little environmental value. Any areas of value have been mapped and further planning of the site will be undertaken in consideration of these areas.                                                                                                                                                                  |
| <b>Constraints to development, including environmental hazards and natural hazards.</b>                                           | The subject site does not contain any environmental hazards that would render the site unsuitable for development.                                                                                                                                                                                                                                                                                                                                                                                       |
| <b>Private sector interest in developing particular land.</b>                                                                     | Private proposals exist to the north of the proposed site. This submission is considered both complementary to and highly consistent with the planned future growth of the area as proposed.                                                                                                                                                                                                                                                                                                             |
| <b>Proximity of land to current and planned locations of employment.</b>                                                          | The subject site is located just south of the identified Menangle Park & Mount Gilead Priority Growth Area. The subject site is also in close proximity to (but separated from) Appin. In consideration existing employment opportunities and the proposed centres as detailed in this submission the subject site will be in close proximity to new opportunities for local employment. The subject site has also been identified as being with 30mins drive of the employment area proposed at Wilton. |
| <b>The cost of infrastructure provision including roads, water, sewerage, public transport, schools and health facilities.</b>    | The proposed transport upgrades within the surrounding area will assist in servicing future development of the subject site. This submission proposes the addition of two local centres and an extension of the proposed bus priority corridor in order to service future urban growth in a sustainable manner.                                                                                                                                                                                          |
| <b>The economic and social cost to communities of having relatively poor access to employment and services.</b>                   | As detailed previously the site is within 30 minutes drive of existing and proposed major and local centres. Development of the site is likely to provide a community benefit by facilitating greater housing supply and improving housing affordability within the region.                                                                                                                                                                                                                              |

## 6.0 Conclusion

The Greater Macarthur Land Release Investigation documentation has overlooked a significant opportunity for the inclusion of the subject site within the proposed Menangle Park & Mount Gilead Priority Growth Area.

The scheduled closure of the existing poultry operation on or before 2019 provides the opportunity for the land to be developed for urban purposes. Assessment of the subject site against the key heads of consideration as identified in the GMLRI has identified that the site is not encumbered by environmental factors or development constraints. As such the land is eminently suitable for development.

The location of the subject site presents a logical continuation of urban land which can be easily integrated within the proposed vision plan for the Menangle Park & Mount Gilead Priority Growth Area.

Ingham Property Group are committed to delivering a new community with all the necessary facilities and services on their landholding within the Greater Macarthur as a priority to assist the Government with land supply for a growing Sydney.

Ingham Property Group have the financial capacity and proven track record in South West Sydney of being able to deliver housing and associated infrastructure.

Inclusion of the subject site within the Menangle Park & Mount Gilead Precinct will greatly contribute to the capability of the GLMRI to deliver housing supply within the region. Development of the site will therefore provide a community benefit by facilitating greater housing supply and as a consequence improve housing affordability within the region.

This can be easily facilitated by the following proposed amendments to the GMLRI documentation:

- Removing the incorrect Poultry Cluster annotation from the Ingham Property Group Landholding.
- The Identification of the subject site as 'Developable Land'
- The Priority Growth Area Boundary be amended to include the subject site and accordingly an amendment to the proposed Menangle Park and Mount Gilead Growth Centre Boundary. This can be facilitated by adjusting the proposed Growth Centre boundary to be aligned along Ousedale Creek to include the additional urban capable land within the subject site.
- Extension of the Bus Priority Corridor to the southern boundary of the subject site
- Extension of the proposed gravity main for the south to service development further south

The inclusion of the Ingham Property Group's land in Appin in to the Menangle Park & Mount Gilead Priority Growth Area is both complementary to and highly consistent with the planned future growth of the region. As such, we respectfully request the merits of this submission are considered. Ingham Property Group commend the State Government for this bold initiative and the strategic work that has been undertaken to date. Ingham Property Group look forward to the opportunity to assist in the delivery of housing as promoted promoted by the GMLRI.

Yours faithfully

**DESIGN+PLANNING**



**NIGEL McANDREW**  
**DIRECTOR**