

18<sup>th</sup> November 2015

Mr Brendan O'Brien  
Executive Director, Infrastructure, Housing and Employment  
23-33 Bridge Street  
Sydney NSW 2000

Dear Brendan

**RE: Draft Greater Macarthur Land Release: Preliminary Strategy & Action Plan  
+ Land use and Infrastructure Analysis  
BROOKS POINT ROAD PRECINCT, APPIN VILLAGE**

I refer to the Department of Planning and Environment's letter dated 22<sup>nd</sup> September 2015 encouraging feedback and submissions on the public exhibition of the *Draft Greater Macarthur Land Release – Preliminary Strategy & Action Plan + Land use and Infrastructure Analysis* and the proposed amendments to the Growth Centres SEPP.

We act for Appin Farmers and Auslands Developments, being owners of land on the southwestern edge of Appin village and described in the attached submission as the Brooks Point Road Precinct. The Brooks Point Road Precinct is consistent with Wollondilly Shire Council's Growth Management Strategy (2011) and has been lodged as a planning proposal.

A submission to the *Draft Greater Macarthur Land Release – Preliminary Strategy & Action Plan + Land use and Infrastructure Analysis* is attached to this letter.

Should you require clarification of any aspect of this submission, please do not hesitate to contact me.

Yours sincerely

A handwritten signature in black ink, appearing to read "G Edwards".

Grahame Edwards  
DIRECTOR - URBAN FUTURES GROUP

**Submission on  
GREATER MACARTHUR LAND RELEASE  
PRELIMINARY STRATEGY + ACTION PLAN**

**Land located at BROOKS POINT ROAD, APPIN**



Prepared for  
**Appin Farmers + Auslands Developments**

Prepared by  
**Urban Futures Group**

**November 2015**



Research - Strategy - Design

## 1. Introduction

This is a submission to the NSW Department of Planning and Environment in respect of future developable land located at the southwestern edge of Appin, known as 'Brooks Point Road Precinct' and illustrated in the aerial photograph in Figure 1.

Urban Futures Group has prepared this submission to NSW Government on behalf of Appin Farmers + Auslands Developments, the landowner of the site.

The purpose of this submission is to provide the Department of Planning and Environment with feedback on the public exhibition of the *Draft Greater Macarthur Land Release – Preliminary Strategy & Action Plan + Land use and Infrastructure Analysis*.



Figure 1 – This aerial image illustrates the extent of the proposed Brooks Point Road Precinct, in the context of Appin village.

Urban Futures Group is acting for Appin Farmers + Auslands Developments on the planning proposal for the Brooks Point Road Precinct, which has been lodged with Wollondilly Shire Council.



## 2. Wollondilly Shire Council's Growth Management Strategy, 2011

In 2011, Wollondilly Shire Council's adopted a Growth Management Strategy (GMS). It is a policy document with associated mapping that provides strategic directions and principles that guide proposals and Council decisions on growth.

The purpose and aims of the GMS are to:

- outline clear policy direction and leadership to the community on growth issues
- provide Council and the community with a strategic framework and assessment tool against which to consider planning proposals
- achieve a long-term sound and sustainable approach to how Wollondilly Shire develops and changes into the future
- inform Council decisions and priorities regarding service delivery and infrastructure provision
- assist in advocating for better infrastructure and services
- provide our strategic response to State Government's Metropolitan and subregional planning strategies being implemented at the local level.

The GMS seeks to take a balanced and realistic approach of planning to accommodate Wollondilly's natural residential growth forecast and to provide new employment lands and uses that do not compromise environmental amenity and rural living.

### **Vision**

Council's vision reflects the community's desire to maintain Wollondilly Shire's rural character, together with the sense of belonging to caring communities that have been at its core for generations.

### **Mission**

To create opportunities in partnership with the community and to enhance the quality of life and the environment, by managing growth and providing sustainable services and facilities.

### **Values**

Council believes its values are important for all its operations and desires that staff work with Council to achieve an organisation that:

- *As a custodian* - Values the past, plans for the future, protects the environment and is responsive to our Community
- *As a decision maker and a service provider* - Ensures equity, openness, integrity, diligence, empathy and accountability
- *As a corporation* - Strives for excellence, responsibility, efficiency, quality improvement and ethical behaviour
- *As an employer* - Support the commitment, ambition, innovation and teamwork of staff

Wollondilly's population of around 43,000 will continue to grow over the next 25 years. The adopted GMS identifies the need to plan for the delivery of at least 7,500 new dwellings over the next 20-25 years in order to house a projected 20,000 additional residents and many more jobs. The GMS notes that this housing needs to be provided in a diverse number of forms so that there are appropriate and affordable housing options for all sections of our community.

To meet NSW Government requirements and projections in respect of metropolitan planning and growth, Council has reviewed and redrafted the GMS. Council and the Department of Planning and Environment have stated that amended Draft GMS will be exhibited following the release of investigations into the Greater Macarthur Land Release.

### **Housing Policies**

In respect of the Brooks Point Road Planning Proposal, the key housing policies are:

*P6 - Council will plan for adequate housing to accommodate the Shire's natural growth forecast.*

*P7 - A high growth or accelerated growth scenario is not being pursued. The extra dwellings needed for the Shire's growth therefore are not intended to accommodate the urban expansion of the Sydney Metropolitan Area\*. (\*It is acknowledged that Wollondilly will continue to accommodate migration from Sydney, however this is distinct from actually accommodating the spread of the Sydney urban footprint)*

*P8 - Council will support the delivery of a mix of housing types to assist housing diversity and affordability so that Wollondilly can better accommodate the housing needs of its different community members and household types.*

*P9 - Dwelling densities, where possible and environmentally acceptable, should be higher in proximity to centre and lower on the edges of towns (on the “rural fringe”).*

*P10 - Council will focus on the majority of new housing being located within or immediately adjacent to its existing towns and villages.*

### **Integrating Growth with Infrastructure**

In respect of the Brooks Point Road Planning Proposal, the key policies are:

*P17 - Council will not support residential and employment lands growth unless increased infrastructure and servicing demands can be clearly demonstrated as being able to be delivered in a timely manner without imposing unsustainable burdens on Council or the Shire’s existing and future community.*

*P18 - Council will encourage sustainable growth, which supports our existing towns and villages, and makes the provision of services and infrastructure more efficient and viable – this means a greater emphasis on concentrating on new housing in and around our existing population centres.*

*P19 - Dispersed population growth will be discouraged in favour of growth in, or adjacent to, existing population centres.*

### **Appin Structure Plan**

To spatially define the future growth and development of the Wollondilly Shire’s towns and villages, a key part of the GMS are the Structure Plans located in the Appendix 2.

The Appin Structure Plan is reproduced in this submission as Figure 2 and clearly demonstrates that Council considers the Brooks Point Road site as a ‘potential residential growth area’ for the village of Appin.

### **Growth Management Strategy + update**

Wollondilly Shire Council has undertaken review and update of the 2011 Growth Management Strategy, but this update is yet to publicly exhibited.

### **Council’s position on the Draft Greater Macarthur Land Release and Appin**

As a consequence of the investigation into the *Draft Greater Macarthur Land Release*, Council placed a moratorium on planning proposals in the Appin area, including the Brooks Point Road site.

Following the public exhibition of the *Draft Greater Macarthur Land Release*, council officers recommended that Wollondilly Shire Council recommence the assessment of the following three planning proposals affecting Appin.

1. *Macquariedale Road Appin*
2. *Brooks Point Road Appin*
3. *Bulli Appin Road*

**At its most recent meeting of 16<sup>th</sup> November 2015, it is understood that Wollondilly Shire Council resolved instead to not recommence the assessment of these three planning proposals and to request that the proponents withdraw the planning proposals instead.**

**Council’s decision is inconsistent with the residential growth policy framework of the Appin Structure Plan contained in the adopted 2011 Growth Management Strategy and with the *Draft Greater Macarthur Land Release – Preliminary Strategy & Action Plan + Land use and Infrastructure Analysis*.**

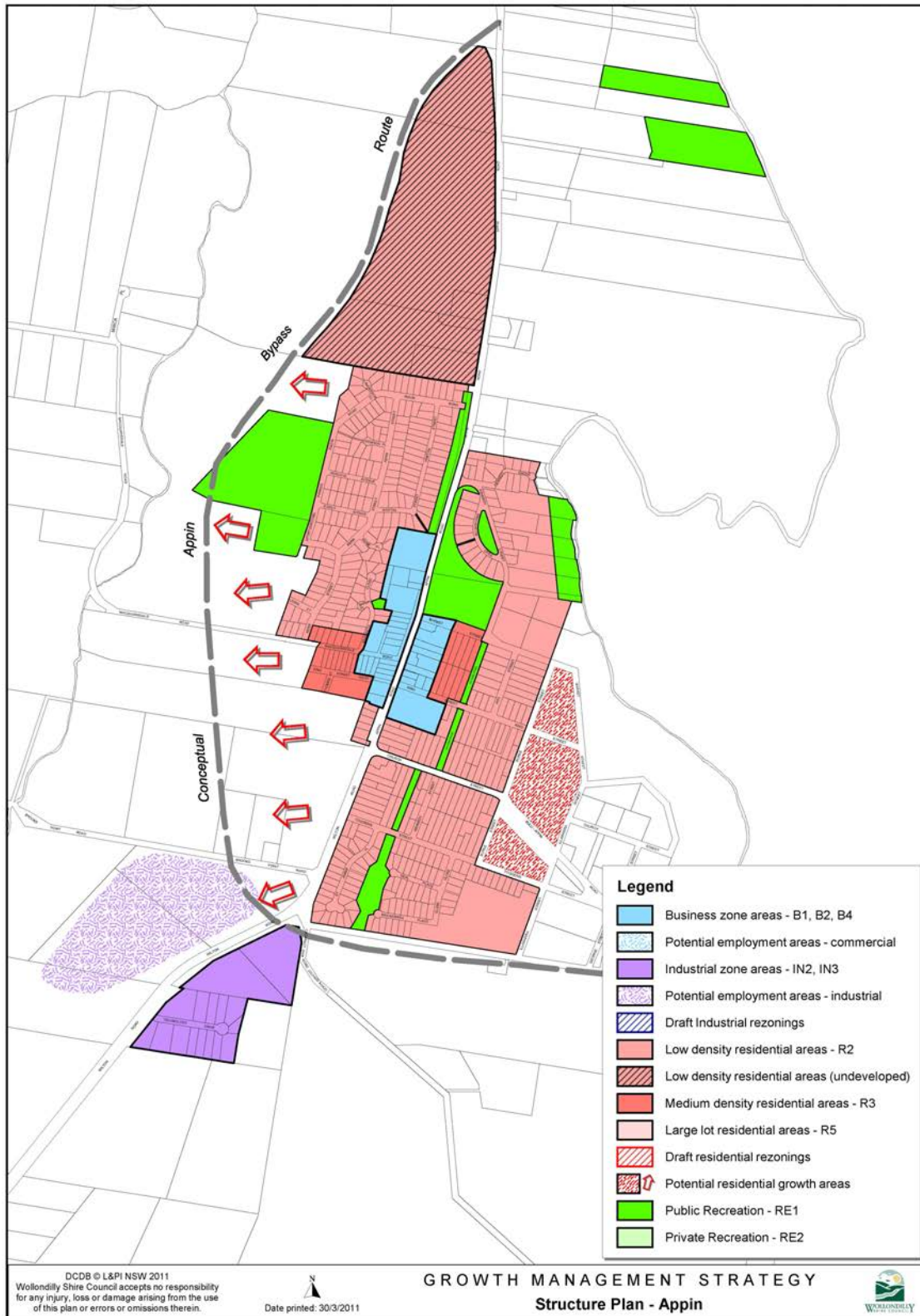


Figure 2 – The Appin Structure Plan, as defined in Council's adopted Growth Management Strategy 2011, clearly illustrates the Brooks Point Road as a 'potential residential growth area' for the village of Appin

### 3. Draft Greater Macarthur Land Release

#### ***Draft Preliminary Strategy & Action Plan + Land use and Infrastructure Analysis***

In September 2015, NSW Government released the *Draft Greater Macarthur Land Release – Preliminary Strategy & Action Plan + Land use and Infrastructure Analysis* for public exhibition.

These investigations into the potential of Greater Macarthur 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.

#### ***Priority Growth Areas (Menangle Park / Mount Gilead and Wilton)***

To increase capacity and housing supply, the preliminary strategy identifies immediate opportunities to deliver up to 35,000 homes in Menangle Park / Mount Gilead and in a new town at Wilton.

Maximising these opportunities requires a coordinated approach to land use planning and infrastructure delivery. The preliminary strategy states that the vision for Greater Macarthur is to be implemented by:

- *Identifying Menangle Park, Mount Gilead and Wilton as Priority Growth Areas by including them in the State Environmental Planning Policy (Sydney Region Growth Centres) 2006 (the Growth Centres SEPP);*
- *Investigating declaring Menangle Park, Mount Gilead and Wilton as Special Infrastructure Contribution Areas to coordinate the funding and delivery of infrastructure that is necessary to support growth; and*
- *Continuing to work closely with Wollondilly Shire Council, Campbelltown City Council, and across NSW Government agencies to facilitate outcomes that deliver new communities with homes, jobs, infrastructure and services while protecting the environment and natural resources.*

#### ***Other Precincts (outside Menangle Park / Mount Gilead and Wilton)***

The preliminary strategy states that study areas located outside Menangle Park, Mount Gilead and Wilton priority growth areas have significant environmental constraints and / or significantly high infrastructure costs to service growth to a level of required investment to be considered not cost-effective.

These remaining study area precincts are not required to meet Sydney's 2036 housing demand targets and have not been identified for release prior to 2036. The preliminary strategy states that beyond 2036, there are opportunities for longer-term supply to provide another 33,000 homes and strategic employment opportunities, supported by the construction of the Outer Sydney Orbital, upgraded Hume Highway interchange and the Maldon-Dombarton freight rail line.

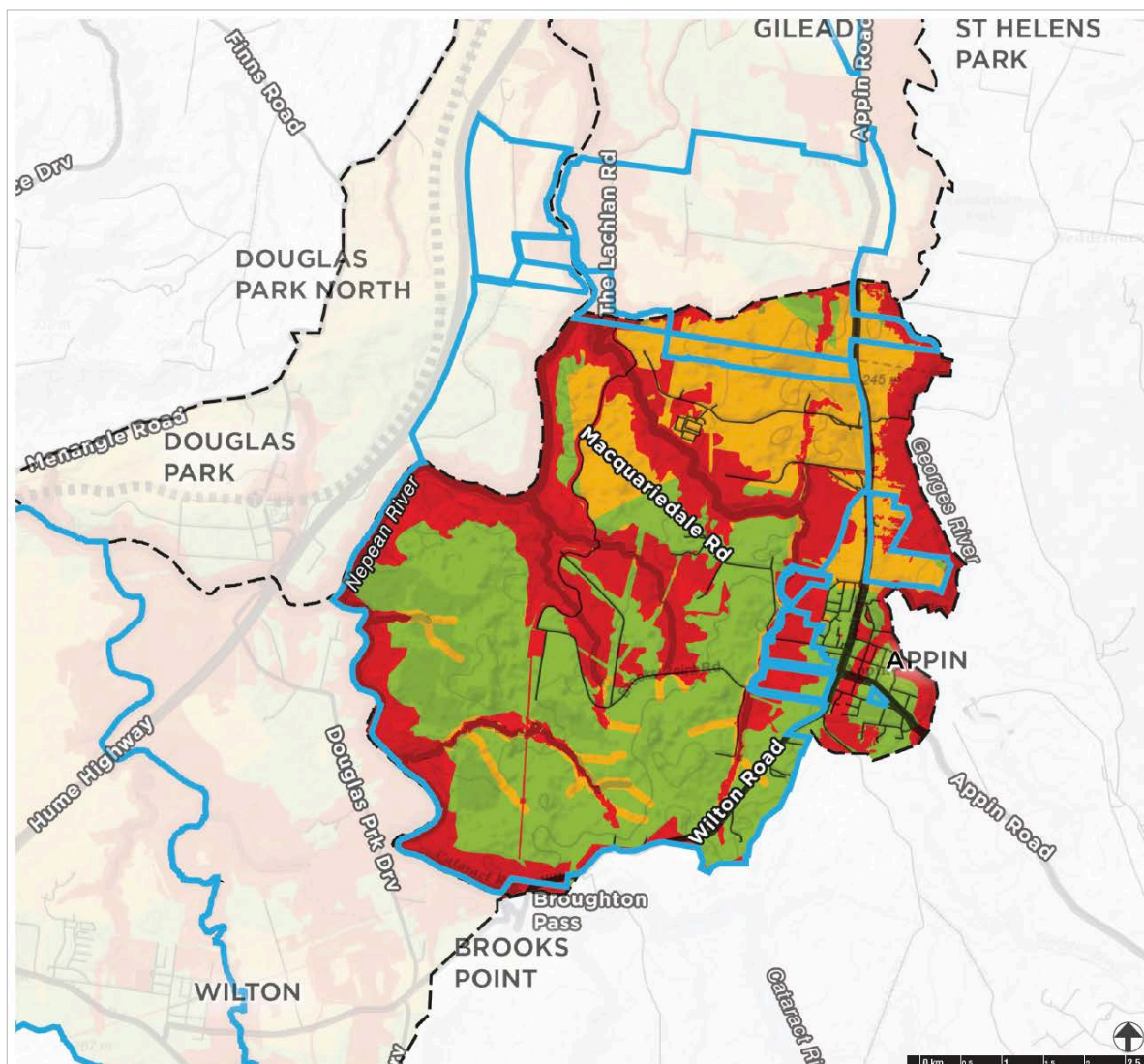
Up to 2036, these other areas are to remain rural in nature, with small-scale development that can be supported by the existing infrastructure and transport network. The rural setting of Appin Village is to be protected, with only small-scale expansion taking place, in line with existing planning proposals that can be supported by the existing infrastructure and transport network.

In the Appin locality, the four known private planning proposals in the *Draft Greater Macarthur Land Release – Land use and Infrastructure Analysis* are identified as:

1. **West Appin Study Area** – proposing up to 18,000 new residential lots, 99,000sqm of commercial space and 372.6ha of industrial area, proposed in three individual planning proposals;
2. **Brooks Point Road** – proposing 340 residential lots;
3. **Macquariedale Road** - proposing 340 residential lots and
4. **Appin East** – proposing 750 residential lots.

Figure 3 reproduces Figure 30 of the *Draft Greater Macarthur Land Release – Land use and Infrastructure Analysis* and identifies the urban suitability of the West Appin / Appin precinct and identifies the four known private planning proposals.





**Figure 30** West Appin Urban Suitability

The suitability for development is divided into three categories:

- Unencumbered land which is suitable for development.
- Land encumbered by constraints which are resolvable with appropriate environmental or staging measures.
- Land which is constrained and not suitable for development.

**Legend**

- Existing Roads
- Existing Rail and Stop
- Known Proposals

Figure 3 - This reproduction of Figure 30 of the *Draft Greater Macarthur Land Release – Land use and Infrastructure Analysis* addresses urban suitability in the Appin area and clearly identifies and account for the Brooks Point Road Precinct as a future development site within the village of Appin.

Three of the four planning proposals identified in the Appin locality are considered capable of being consistent with desired scale, character and growth potential of Appin village.

These planning proposals - *Macquariedale Road*, *Appin East* and *Brooks Point Road* - are physically connected to Appin and capable of contributing to the frame and character of the village and its rural setting.



#### 4. Landowner position and issues arising

The Brooks Point Road Precinct landowner is in general support the findings and recommendations of the *Draft Greater Macarthur Land Release – Preliminary Strategy & Action Plan*, specifically its acknowledgement of the importance of the rural character of Appin and support for planning proposal that respect this.

Following a review of the *Preliminary Strategy & Action Plan* and *Land use and Infrastructure Analysis*, a number of issues have arisen that the consortium believes need to be amended prior to finalisation of the *Greater Macarthur Land Release Strategy and Action Plan*.

##### a) Vegetation mapping

The Brooks Point Road Precinct landowner consortium has significant concerns regarding the draft vegetation mapping shown in Figure 30 of the draft strategy and the implications this will have on future development potential.

It is understood that the draft vegetation mapping that forms part of the *Draft Greater Macarthur Land Release Strategy* has been generated through desktop analyses of aerial photographs and has not necessarily been the subject of on-site survey work and groundtruthing.




The key issue that arises is that in the absence of on-site survey work, this analysis and mapping technique tends to make overly broad assumptions regarding the extent and value of vegetated areas. This is clearly demonstrated in Figure 4 below, which illustrates that the Brooks Point Road site is either constrained (red) or unencumbered (green), but mostly the former. This is clearly inaccurate, as it does not identify any land that is encumbered but resolvable (orange), of which there is a lot.

This plan also fails to identify and map the proposed Appin bypass, which defines a western edge for Appin. Council has commenced rezoning land SP2 Infrastructure (Road) to facilitate the future construction of this bypass. The north-south Appin bypass (SP2) road reservation will affect the development of the Brooks Point Road Precinct.



Figure 4 – This extract from the Figure 30 of the *Draft Greater Macarthur Land Release – Land use and Infrastructure Analysis* illustrates the vegetation mapping that is of concern to the Brooks Point Road landowner.

The desktop based mapping technique is compounded by the chosen legend categories for red and orange mapped lands, which is reproduced below:

	Unencumbered land which is suitable for development.
	Land encumbered by constraints which are resolvable with appropriate environmental or staging measures.
	Land which is constrained and not suitable for development.

The landowner is of the view that all the land shown mapped red within the Brooks Point Road Precinct is not necessarily constrained and not suitable for development and that the mapping has the effect of a prohibition, but prior to any actual on ground analyses actually informing that status. It is argued that much of the land mapped red, should in fact be mapped orange.

#### **Recommended change**

It is recommended that the department either amend the vegetation mapping, or the legend, or a combination of both. The following approach is suggested.

- i. Introduce a new (darker) red category that is defined by the retention of recognised high value vegetation and endangered ecological communities and is non-negotiable. The Georges River Regional Open Space is an example of this category and
- ii. Retain the remaining areas shown as red, but amend the legend to state – ‘**Land which may be constrained and needs to demonstrate suitability for development**’.

This amended approach will enable future planning proposals to address these (and other) issues in a proper and rigorous manner.

#### **b) (Indicative) Dwelling yield**

Dwelling yield is an issue that in part relates to the extent and impact of vegetation mapping. For the known private proposals in the Appin locality, the dwelling yields indicated by the *Draft Greater Macarthur Land Release – Preliminary Strategy & Action Plan + Land use and Infrastructure Analysis* appear to be inconsistent and inaccurate.

Table 2 and Figure 7 on Page 10 of the *Draft Greater Macarthur Land Release - Land use and Infrastructure Analysis* identify the Brooks Point Road site as having a proposed residential yield of 228 dwellings (refer to the reproduced Table 2 in Figure 5 below).

This is contradicted by pages 38 and 39 of the *Draft Greater Macarthur Land Release – Land use and Infrastructure Analysis*, which states that *Brooks Point Road proposes 340 new residential lots*.

Proposal	Area (Ha)	Proposed Residential Yield (Dwellings)	Proposed Employment land (Ha)	Status
Appin East	63	750	-	Preliminary inquiries
Brooks Point Road, Appin	24	228	-	Revised proposal being prepared
Bulli-Appin Road	-	20		Gateway approval
Glenlee (Camden-Campbelltown)	110		110	Gateway approval
Macquariedale Road, Appin	60	340	-	Gateway approval
Menangle Park Release Area	888	3,400	-	Gateway approval
Moreton Park Road, Menangle	600	390	240	Refused by JRPP
Mt Gilead	210	1,500	-	Post Exhibition
South Campbelltown	946	12,000	-	Referred to DP&E
Station Street, Menangle	38	350	-	Post Exhibition
West Appin Study Area (including three individual planning proposals)	3,437	18,000	373	Pre Gateway
Wilton Junction Study Area	2,774	12,000	181	Pre Gateway
<b>Total</b>	<b>9,150</b>	<b>48,978</b>	<b>904</b>	

Figure 5 – Reproduction of Table 2 of the *Draft Greater Macarthur Land Release - Land use and Infrastructure Analysis*

In concept design work and revised proposal being completed for the landowner, the dwelling yield estimates for all development options to date have never approached 340 new residential lots, but they are in excess of 228 dwellings.

The estimated yield draws into focus the problem highlighted by the inaccurate vegetation mapping referred to above in a). A yield of 228 or 340 new residential lots, in a character consistent with Appin village, is not possible on the land that remains unencumbered (green).

#### Recommended change

It is recommended that should the department retain dwelling yield estimates in the finalised strategy, the text be amended to qualify to:

- delete the term / phrase ***proposes XXX new residential lots; and***
- replace with terminology such as ***'Preliminary dwelling yield estimates'*** or ***'Indicative dwelling yield estimates'***.