

18th 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
APPIN EAST PRECINCT, APPIN VILLAGE**

I refer to the Department of Planning and Environment's letter dated 22nd 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 the Appin East Landowners Consortium, being owners of land on the northeastern edge of Appin village and described within the attached submission as the Appin East Precinct.

Previously we have prepared a joint submission from the Appin East Landowners Consortium and the NSW Office of Strategic Lands to Wollondilly Shire Council as part of their review of the Wollondilly Growth Management Strategy, 2011.

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 APPIN EAST



Prepared for:
Appin East Landowners Consortium

Prepared by:
Urban Futures Group



Research - Strategy - Design

November 2015

1. Introduction

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



Figure 1 – Aerial image illustrating the extent of the proposed Appin East Precinct

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*.

Urban Futures Group has prepared this submission to NSW Government on behalf a consortium of local landowners located within the land identified as 'Area of Consortium Interest', illustrated below in Figure 2.

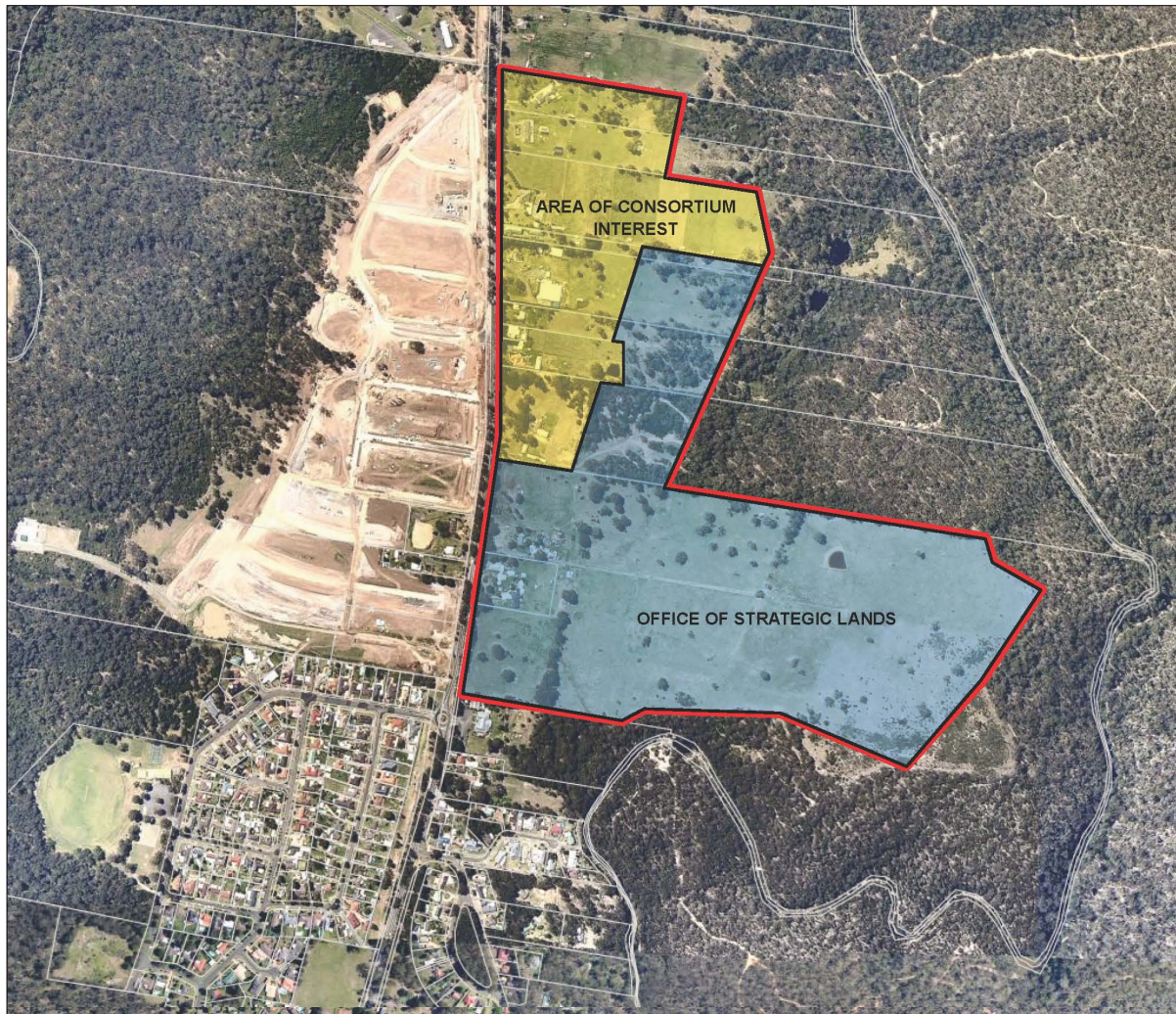


Figure 2 – Aerial image illustrating the extent of the Appin East Precinct, clearly identifying the area of landowner consortium interest and the area owned by the NSW Office of Strategic Lands

In May 2014, Urban Futures and Saturday Studio prepared a joint submission on behalf of both the landowner consortium and the NSW Office of Strategic Lands to Wollondilly Shire Council.

The purpose of this initial submission was to request that Wollondilly Shire Council, as part of its review of the Wollondilly Growth Management Strategy (2011), consider the inclusion of land in Appin East Precinct as a future residential development area.

Wollondilly Shire Council has yet to publicly exhibit the amended Growth Management Strategy and has recently placed a moratorium on planning proposals in the area affected by the *Draft Greater Macarthur Land Release*.

2. Appin East Precinct - Preliminary urban structure concept

To illustrate and inform discussion, a preliminary concept for the urban structure of the Appin East Precinct was prepared. This structure is indicative only and will require further investigation and design development and is illustrated in Figure 3.

The indicative urban structure concept reflects and illustrates the key planning, design and environmental principles that seek to provide both a defined urban framework and a connected structure for the future growth and development of the Appin community.

The key features of the preliminary urban structure concept are:

- A clear and strongly defined delineation between potential urban residential growth areas and parklands
- The potential to provide an accessible edge and future public access to significant areas of Georges River Regional Open Space
- A connected street structure that creates the potential for a 'greenway' that provides a strong north-south boulevard parallel to Appin Road
- Utilisation of the new (Appin Valley) roundabout for a main access point, potentially combined with (limited) access points to the north and south that improve connectivity with Appin
- An opportunity to create a 'place' close to the intersection of the main access and the 'greenway'

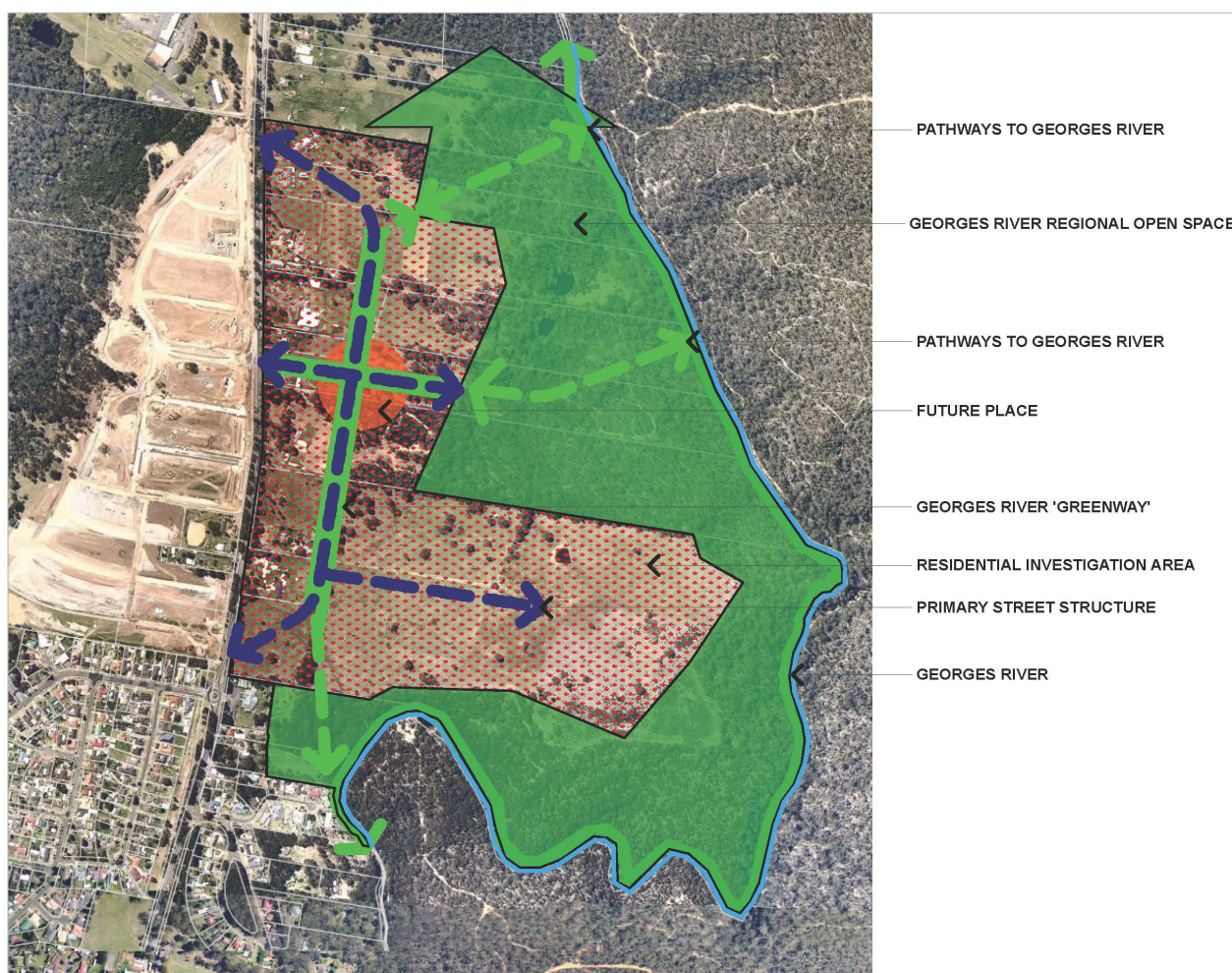


Figure 3 – The preliminary urban structure concept plan for the Appin East Precinct, as submitted to Wollondilly Shire Council, in respect of its review of its adopted Growth Management Strategy (2011).

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 *Draft Greater Macarthur Land Release – Land use and Infrastructure Analysis* identifies the four known private planning proposals 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 4 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.

* As a point of clarification, the department should note that the Appin East Precinct proposal is in the first instance, a joint submission from the landowner consortium and the Office of Strategic Lands to the review of Wollondilly's Growth Management Strategy. The purpose of the submission is to include the Appin East Precinct as a future residential development area as part of an amended Appin Structure Plan. It is the intent of the landowner consortium and the Office of Strategic Lands to seek the future rezoning of the Appin East Precinct for residential uses in the near future through the planning proposal process.

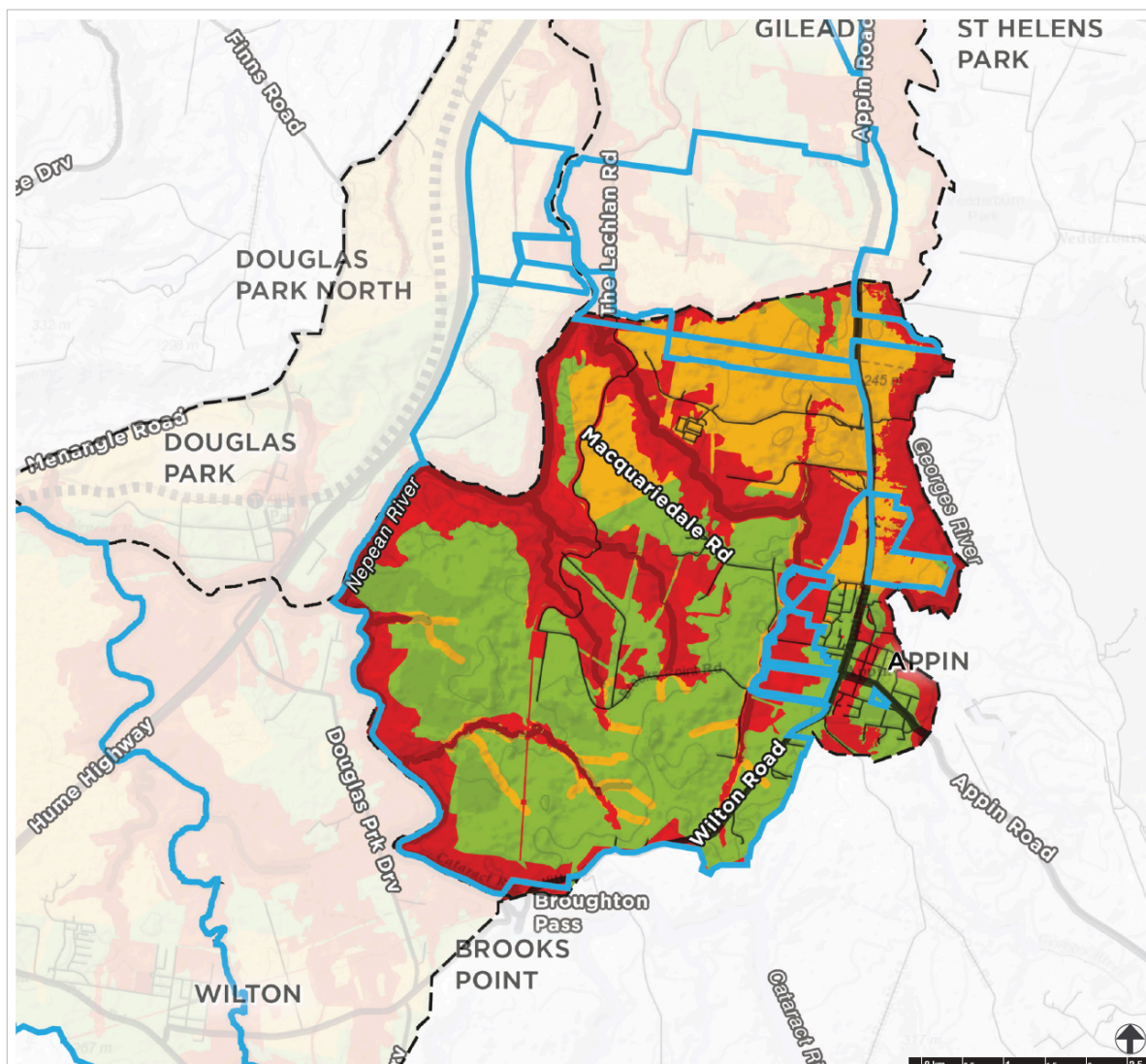


Figure 30 West Appin Urban Suitability

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 4 - 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 Appin East Precinct as a possible future development site within the village of Appin.

Three of the four proposals in the Appin locality identified by the *Draft Greater Macarthur Land Release – Land use and Infrastructure Analysis* are considered potentially capable of being consistent with desired scale, character and growth potential of Appin village.

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

4. Consortium position and issues arising

The Appin East Precinct landowner consortium in general supports 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 Appin East Precinct landowner consortium has concerns regarding the draft vegetation mapping shown in Figure 30 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 5 below, which illustrates the rather specific mapping of landowner consortium interests in the Appin East Precinct.



Figure 5 – 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 landowner consortium.

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 consortium is of the view that the land shown mapped red within the Appin East Precinct is not necessarily constrained and unsuitable 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 some of the land mapped red, should be in fact be mapped orange.

Vegetation mapping - Recommended change

It is recommended that the department:

- i. amend the vegetation mapping on the consortium land to recolour the red areas as orange and thus be classified as '*Land encumbered by constraints which are resolvable with appropriate environmental and staging measures*'.

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

b) General mapping

The Appin East Precinct landowners have some concerns regarding the general mapping shown in the *Draft Greater Macarthur Land Release – Preliminary strategy and Action Plan* and the implications this may have on future development potential.

A close inspection of the layered mapping of constraint and opportunities reveals that the accuracy of constraints and opportunities mapping, when combined with the line weights used, can lead to a misinterpretation of constraints that apply to land within the urban release area. This is demonstrated on consortium land by and Figure 12 Agricultural and land soil capability of the Draft Strategy (refer to Figure 6), which identifies the entire future precinct as being characterised by Class 2 soils.

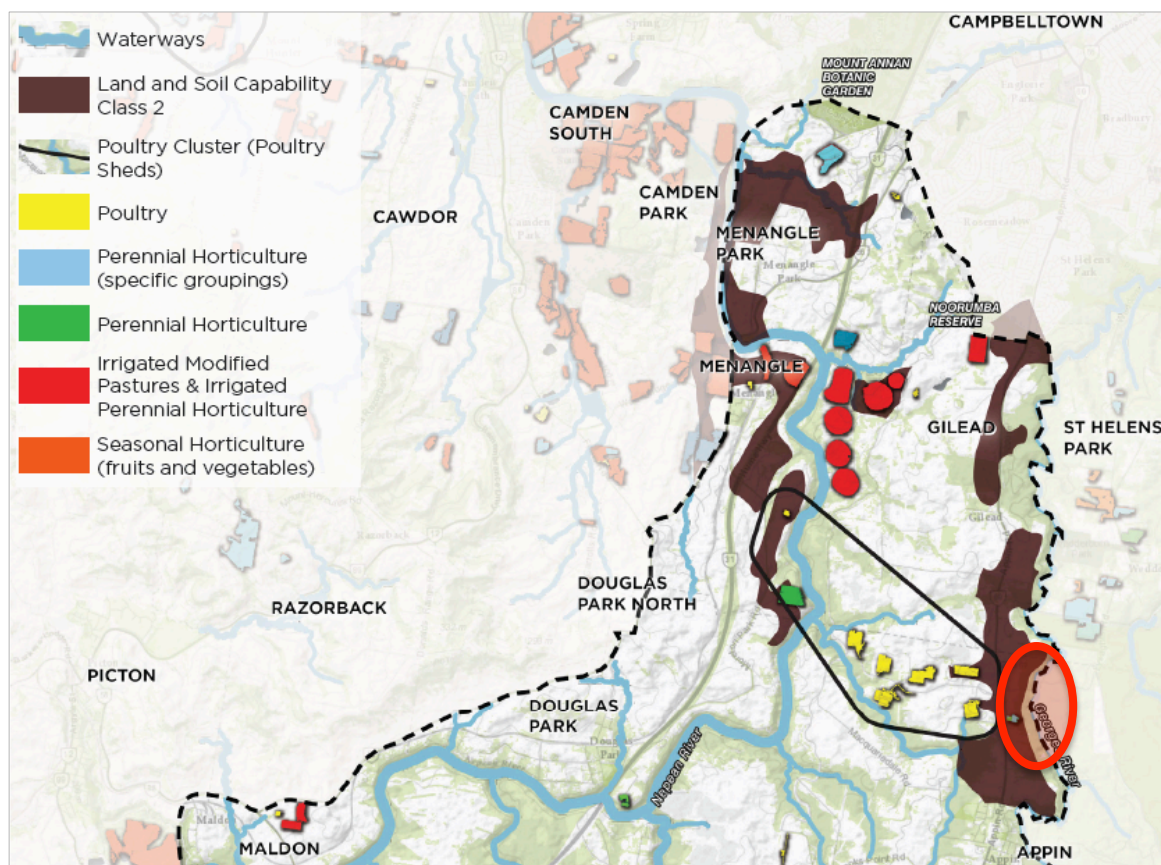


Figure 6 – Reproduction of Figure 12 Agricultural and land soil capability

General mapping - Recommended change

In respect of mapping, it is recommended that the department amend the *Draft Greater Macarthur Land Release – Preliminary Strategy and Action Plan and Land use and Infrastructure Analysis*, to ensure that the accuracy of mapping is qualified, by clearly stating that the delineation of actual constraints and developable opportunities are at a strategic level and subject to further, more detailed study and investigation as part of future rezoning proposals.

c) (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 Strategy and Action Plan* appear to be over ambitious.

The draft strategy states that the *Appin East proposes 750 new residential lots*. This may or may not be correct. In the submission made to Wollondilly Shire Council to date, the landowner consortium and the NSW Office of Strategic Lands have focused on broader planning, design and landscape principles and have not made estimates or statements regarding dwelling yield.

Dwelling yield - Recommended change

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

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