

GREATER MACARTHUR LAND RELEASE INVESTIGATION Greens NSW Submission 18 November 2015



By email: community@planning.nsw.gov.au

Introduction

Thank you for this opportunity to make a submission in response to the Greater Macarthur Land Release Investigation.

In considering this proposal, we have prioritised the principle of ecologically sustainable development. In summary the proposed land release fails each element of this assessment. In light of this, we consider that due to their impacts on air quality, biodiversity and waterway health the proposed land releases should not proceed.

It is also considered likely that the releases will create isolated outposts of poorly serviced urban sprawl where residents will be wholly dependent on private motor vehicles. This would be a seriously retrograde step, environmentally, socially and economically.

While accepting there will be a short term windfall gain for the developers involved, the longer term costs will not be sustainable either from the perspective of the residents or the government. Residents will not have ready local jobs and they will be dependent on expensive and unsustainable car based transport to existing employment hubs in the Sydney CBD and elsewhere.

From the taxpayer's perspective, the long term costs associated with necessary infrastructure required to make these developments feasible including the proposed rail extension and other services such as hospitals, schools and other services will impose large public costs to compensate for poor initial planning.

Background

In [2011](#) the government invited landowners in greater Sydney to put forward sites that they wanted to develop for housing so that the government could consider overriding current planning controls to expedite urban releases.

The sites included in this Investigation are the result of this invitation. They are all sites that have, over a long period and on multiple occasions, been unsuccessfully put forward by their owners for urban development. On numerous occasions these sites have been rejected due to issues with accessibility, servicing and due to site constraints such as air quality, flooding and biodiversity. The costs of addressing these constraints are prohibitive.

Sydney already has extensive urban release precincts covering 27,000 ha spreading across the NW and SW Sectors. The Department of Planning [website](#) indicates that the NW and SW sectors will “sustainably and sensibly manage the growth and change expected in the Sydney region over the next 25 to 30 years.” These sectors, consisting of 34 precincts will accommodate over 500,000 people. They are adequate to provide Sydney’s green field housing land demands within a reasonably compact development footprint for the foreseeable future.

The NW and SW sectors were selected for urban release in 2003 at the same time that the Macarthur South sector, including the sites now under investigation, was specifically rejected for urban release. In 2009 the government reiterated an intention **not** to release Macarthur South after investigations indicated potential infrastructure costs of up to \$100,000 per lot ([Keneally, 2009](#)).

The Greater Macarthur Land Release Investigation Area consists of 17,000ha to house 34,700 people in uncoordinated and discrete landholdings located up to 80km from Sydney. Its release would create inaccessible, poorly serviced suburban sprawl, consigning the occupants to isolation or total car dependency. It would be the antithesis of good planning.

The key reason to reject the Investigation Area is air quality

The government should be well aware that the air quality of the southern and western part of Sydney is a constraint for development.

The [poor air quality](#) of the Macarthur subregion was a key reason for the area being excluded from urban releases: first in 1988 when the Planning Department placed a moratorium on development in Macarthur due to air quality; and again in 2003 when it was decided that Macarthur should be omitted from the decision to release the NW and SW Sectors - and not reconsidered until it became clear that air quality in the subregion is improving.

NSW EPA air quality monitoring has for many years consistently shown that the Macarthur subregion experiences ground-level ozone concentrations which exceed national air quality standards. Ground-level ozone is a key component of photochemical smog which appears as white haze in summer and which is clearly associated with increases in mortality, hospital admissions, respiratory symptoms, and decreases in lung function.

While the east of Sydney over the last decade (2004-2014) has experienced only one exceedance of the one hour ozone goal, the following table shows that there are significant numbers of exceedances experienced in southern and western Sydney:

| Year | Bringelly | Bargo | Macarthur | Oakdale |
|------|-----------|-------|-----------|---------|
| 2004 | 8 | | * | 9 |
| 2005 | 6 | 3 | 11 | 7 |
| 2006 | 10 | 3 | 18 | |
| 2007 | 5 | 5 | 5 | 8 |
| 2008 | | | | |
| 2009 | 7 | 11 | 11 | 10 |
| 2010 | 2 | | 3 | |
| 2011 | 5 | 2 | 5 | 4 |
| 2012 | | | * | |
| 2013 | 3 | | * | |

| | | | | |
|------|---|---|---|---|
| 2014 | 4 | 3 | * | 1 |
|------|---|---|---|---|

* : Data unavailable.

Source: [NSW EPA air quality monitoring data](#).

Air quality is significant to any consideration to release new green field urban releases because the new population of these releases is likely to be young families. It is well recognised that ozone has significant adverse impacts on children with asthma see [Asthma Australia](#).

Ozone is not substantially improving in southern and western Sydney. The proposal to build a second Sydney airport at Badgerys Creek would further exacerbate air pollution and the cumulative impact on the Macarthur subregion would be severe.

Urban releases in Macarthur will consign vulnerable people to poor air quality.

Other reasons to reject the Investigation Area include

Accessibility

The Investigation Area has no public transport availability with the possible exception of an unexplored extension of the heavy rail 10km to Menangle Park. It will be entirely dependent on road based transport for the foreseeable future.

A fundamental principle of sustainable modern planning is integrating public transport into new residential releases to avoid car dependency. Release of the Investigation Area will consign residents to long, expensive and unsustainable car journeys. Each dwelling will likely require multiple cars and the average trip will be long given the distance of Macarthur from the rest of Sydney. Planning for such car dependency is retrograde.

If a release of the Investigation Area was to include even the minimal amount of public transport mentioned in the report (a 10km extension of the SW rail line to the proposed Menangle release) the true cost of the release would escalate by billions of dollars. By expressly refusing any state government infrastructure spend on the Investigation Area the government would essentially condemn new residents to second class, expensive transport options that have largely been rejected in recent good planning around the world and in the rest of Sydney.

Jobs

The Preliminary Strategy and Action Plan indicates that:

- Menangle and Mt Gilead will have access to jobs in Campbelltown and Macarthur as well as the rest of Sydney
- a new town at Wilton will cater for the growing population of Wollondilly Shire and deliver new jobs and services
- it will continue to work closely with Wollondilly Shire Council, Campbelltown City Council, and across NSW Government agencies to facilitate outcomes that deliver new communities with jobs.

This is not a plan nor does it provide any more than a wish that jobs will appear. Responsible urban planning requires a clear strategy to create employment or provide ready access to employment. Just releasing land at the behest of developers who undertake to provide employment land in isolated

locations where there is little current employment nor likelihood of employers being attracted would be irresponsible.

Further, should jobs be made available in the release areas, there is no evidence that they would be taken by residents. New residents will find work across Sydney and any new job opportunities in Macarthur would be open to all residents of Sydney. To suggest that any new jobs would be taken by new residents is specious.

Appin –a planning process **not** to replicate.

The Preliminary Strategy and Action Plan indicate that there has been keen interest from the private sector to release land in Macarthur and notes piecemeal development as the result. A list of 12 proposals is provided half of which focus on Appin. The experience of releases around Appin shows clearly why developer driven urban releases are not a sound basis for the planning:

- Appin Rd is inadequate and its upgrade has lagged far behind development . Congestion is chronic
- electricity and water capacity is problematic as developer contributions associated with these services were progressively downsized in amendments to development applications for Appin
- biodiversity protection compliance has been shameful with the developer subject to numerous regulatory interventions,[2009](#), [2010](#), [2011](#), [2012](#)
- the impact of critically endangered EECs including sandstone shale transition forest is unsustainable and unreasonable.

Bringing more developer driven development online in Macarthur is not sound planning.

Wilton is totally unacceptable as a Sydney land release

The primary reason given for releasing Wilton is the “considerable developer interest and local authority support”. The second reason is that “development will be proponent led, with required infrastructure provided at no cost to the government”.

Neither of these reasons constitutes a competent planning rationale for the release of any land. Wilton is over 80km from Sydney, closer to Goulburn than Sydney and more a part of the Southern Highlands than a part of Sydney. It is not suitable to be considered as part of the State Environmental Planning Policy (Sydney Region Growth Centres)

Even the CEO of the Urban Development Institute of Australia NSW has drawn attention to the fact that the inclusion of Wilton will create ["a big hole in the donut"](#) between two totally separate releases. Predictably his preference is to release the entire Investigation Area in one hit for the developers he represents and the Greens do not support this. However the Greens do support the point that the government should not create a disaggregated and uncoordinated release area with 16,600 dwellings stranded 80km from Sydney.

It would be an abrogation of the government’s planning responsibilities to support the release of a totally car dependent residential community of over sixteen thousand dwellings and 360ha of isolated shopping and employment land in an area with no services or utilities and with no access other than the already overcrowded Hume Highway/M5 - just because a developer wants it to happen.

Despite the fact that the government has no plans whatsoever to provide any infrastructure of any type for a Wilton release, the Planning Minister Rob Stokes has denied he is adding to Sydney's sprawl, saying the new residents in the region would also have access to jobs there. Yet South-western Sydney has a substantial gap between the number of jobs and the number of residents, and the government has no plan for local jobs. There is no reason to accept that releasing 360ha of land for retail and employment will create anything more than speculative profits for developers.

But whether Wilton becomes a regional centre with jobs or a jobless stranded urban release, it will be entirely dependent on the Hume Highway/M5. Either way people will be joining the existing traffic jams heading into and out of the city each day. This is not the type of planning that Sydney needs.

In addition Wilton is surrounded by pristine rivers and creeks and bushland. Allens Creek is to the east, Sydney Water Catchment Special Area to the south and Nepean River to the west. There is no information provided about how services – especially sewerage - could be provided without adversely impacting on the most pristine waterways in Sydney.

The release of Wilton would be totally unsustainable.

Other precincts

One positive aspect of the Investigation is that it identifies the areas of West Appin, Menangle and Douglas Park and Cataract as unacceptable for release for at least 20 years and thereafter until the significant environmental constraints and the extremely high costs of servicing can be dealt with.

The Greens support the clear statement that these lands have significant environmental constraints. We support their permanent protection from urban sprawl.

It is important to note that there is no difference between these sites and Wilton. Wilton also should not be released.

Should you wish to discuss any of these matters further, please don't hesitate to contact my office on (02) 9230 3030 or david.shoebridge@parliament.nsw.gov.au

Thank you for your consideration of this matter.

Regards,

A handwritten signature in black ink, appearing to read 'D. Shoebridge', written in a cursive style.

David Shoebridge
Greens NSW MP