

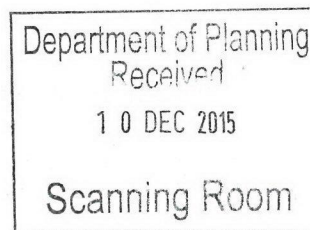
Our Reference: TRIM 8520 AG:AG

Department of Planning and Environment  
Housing Land Release  
GPO Box 39  
SYDNEY NSW 2001



Attention: Brendan O'Brien

7 December 2015



Dear Sir/Madam,

### **Greater Macarthur Preliminary Land Release**

Thank you for the opportunity to comment on the Greater Macarthur Preliminary Land Release Strategy and Amendment to the State Environmental Planning Policy (Sydney Region Growth Centres) 2007 (Growth Centres SEPP).

Council is supportive of the creation of a new town at Wilton. The following information and comments are provided in relation to the exhibited documents.

#### **1.0. Greater Macarthur Land Release Investigation – Preliminary Strategy and Action Plan**

The Preliminary Strategy and Action Plan ('Preliminary Strategy') identifies two Priority Precincts for inclusion in the SEPP (Sydney Region Growth Centres). The Plan suggests there is an immediate opportunity to deliver up to 35,000 homes in Menangle Park/Mount Gilead and in a new town at Wilton. Beyond 2036 another 33,000 homes could be provided in surrounding areas.

The Preliminary Strategy contains a Vision for Greater Macarthur in terms of infrastructure, land use and a retail hierarchy to support the population growth.

The Preliminary Strategy nominates the significant rezoning issues for the Priority Precincts and outlines Delivery Pathways to address these issues.

The Delivery Pathway sets the framework for the future assessment of rezoning applications to address the mining co-existence issue and biodiversity constraints. The Delivery Pathway is less prescriptive when addressing waterways.

#### **Comments:**

- The Vision for Greater Macarthur suggests that rail electrification to Menangle Park will be investigated. It is also understood that NSW Government has committed substantial funds to review the viability of the Maldon Dombarton Freight Rail.

- The Spring Farm Link Road will not only serve to relieve the pressure on Narellan Road and Appin Road. It will also serve to relieve the significant pressure on Finns Road, Menangle Road and Woodbridge Road in Menangle.
- Any proposed Bus Priority Corridor should extend to Appin Village. A two way bus loop to Campbelltown which incorporates Appin and Wilton should be considered in the longer term.

These initiatives are fundamental to support the proposed urban growth.

- In terms of the co-existence issues; exploration and resource extraction followed by urban development will result in the fragmented delivery of infrastructure given some land in Wilton is encumbered by mining and other land is unencumbered.
- The establishment of the town centre and much needed educational institutions may also be delayed considerably.

The coexistence issue needs to be resolved to permit urban development on encumbered land at the same time as surrounding unencumbered land.

- More clarity in relation to policy and legislative framework in the Delivery Pathways to address biodiversity constraints water quality would assist the rezoning assessment process.
- The Delivery Pathways to address biodiversity constraints should require revision of previous ecological based reports associated with the Wilton Junction proposal to give a contemporary statutory and policy context.

Regarding the funding mechanism to facilitate delivery of the urban development the "at no cost to government" stance is noted. Given that individual rezoning applications / planning proposals are likely to be assessed at the local level, the cost to Council is expected to be significant.

- Council seeks financial assistance via a State Planning Agreement for additional resources to manage urban growth.
- In terms of developing a local Section 94 Contribution Plan an increase of the cap to \$34,000 per lot would be appropriate given the greenfield nature of the precinct.

## **2.0. Greater Macarthur Land Release Investigation – Land Use and Infrastructure Analysis**

The Analysis refers to "existing and planned" infrastructure for water, sewer, electricity etc. It also refers to "planned and potential" infrastructure particularly in relation to transport. It is understood, however, that some of the planned infrastructure, such as the sewer network and wastewater treatment plant, might be better described as potential infrastructure.

To deliver a new town centre and up to 16,600 new homes at Wilton, Council requires clear understanding of the level of commitment from the Government to fund planned and potential infrastructure.

- The Wilton Junction High Level Master Plan is based upon the sewer network largely confined to that precinct. An interconnected sewer network for the entire Greater Macarthur area has not been previously contemplated.



- Consideration should be given to the underground supply of electricity in line with the provision arrangements for the existing Growth Centres.
- In terms of mining values and constraints the Analysis does not recognise the Power Plant proposed for Douglas Park. A formal application for the Power Plant is expected mid-2016.

### **2.1. Priority Precinct – Menangle Park and Mount Gilead**

The Priority Precinct has an area of 849 hectares of unencumbered land suitable for residential development, and 15 hectares of unencumbered land suitable for employment uses. There is a further 363 hectares of encumbered land for residential purposes.

The known Planning Proposals in the precinct have the potential to generate up to 18,100 new homes on the boundary of the Wollondilly Local Government Area. The Preliminary Strategy suggests that rezoning of this precinct could be finalised by the end of 2015 with the first new houses possible within two years.

- The Planning Proposal for Mount Gilead suggests the majority of traffic generated by the new estate will travel in a northerly direction. Council has previously commented that the impact from traffic upon Appin Village is likely to be significant. To alleviate traffic congestion in this area, Council is planning a Bypass around Appin, which is an unfunded project. It would be appropriate for any Special Infrastructure Contribution / State Planning Agreement negotiated by Government for the Menangle Park and Mount Gilead Precinct to contribute to funding construction of the Appin Bypass.

### **2.2. Priority Precinct – Wilton**

The Wilton Priority Precinct has an area of 554 hectares of unencumbered land suitable for residential development. There is a further 552 hectares of encumbered land for residential purposes.

Council participated in the development of the Wilton Junction High Level Master Plan ('Wilton Master Plan'). The following notable amendments to the Wilton Master Plan are detailed in the Vision for Greater Macarthur:

- The housing yield for the area has increased from 12,000 to 16,600 new dwellings.
- The Vision for Greater Macarthur suggests an alternative retail arrangement to that envisaged in the Wilton Junction Master Plan including proposed village centres in West Wilton and Maldon.
- The precinct includes a considerable parcel of land at West Wilton not included in the Wilton Junction Master Plan. The known Planning Proposals for this precinct have the potential to create 12,000 new dwellings. Based upon the Departments estimation of 16,600 potential new dwellings, it is assumed that West Wilton may accommodate up to 4,600 new homes.
- Approximately 131 hectares of unencumbered land and a further 321 hectares of encumbered land have been identified for employment purposes. This includes land at Maldon between Menangle Road and the Nepean River. The Analysis suggests this land could be zoned to permit heavy industrial use.



- The floor space for the proposed town centre has increased from 55,000m<sup>2</sup> to between 100,000 and 150,000m<sup>2</sup>.
- The educational facilities shown in the Wilton Junction Master Plan consisted of two primary schools (plus Wilton Public School in Bingara Gorge Estate) and two kindergarten to year 12 schools. The Vision for Greater Macarthur proposes 7 primary schools, 2 high schools and a specialty school (i.e. agriculture).
- The highway service precinct shown in the Wilton Junction Master Plan does not appear in the Vision for Greater Macarthur.
- The Wilton Junction Master Plan identifies two intersection points along Picton Road to access West Wilton. In addition to these works, the Analysis suggests that Picton Road will be upgraded to a four lane arterial standard between Hume Highway and Picton.

#### **Comments:**

- Council has worked with the Department and Wilton Junction Land Owners Group to develop the Wilton Junction Master Plan. The high level nature of the Vision for Greater Macarthur is acknowledged. It is recommended however that the Vision incorporate the planned highway service precinct proposed south of the town centre.
- In recent times considerable work has been carried out with the Department, Roads and Maritime Services and Wilton Junction Land Owners Group to develop an Infrastructure Sequencing Plan for the provision of state and local infrastructure.
- Prior to finalisation of the Land Release Strategy, Council recognises the need to test the capacity of existing and proposed infrastructure to accommodate the additional 4,600 homes envisaged for West Wilton.
- The capacity of the two intersections on Picton Road requires modelling in light of the additional population. It is noted that the northern intersection is proposed across land encumbered by mining. Any decision regarding the density and sequencing of urban development in West Wilton requires a level of certainty in terms of delivery of the northern intersection.
- The provision of social infrastructure also requires re-examination. Any shortfall identified by the capacity / threshold tests needs to be addressed in terms of a funding mechanism for new or augmented infrastructure. A revised Wilton Junction Master Plan should clearly indicate where any new infrastructure (e.g., open space, schools etc) will be provided.
- The development forecast for West Wilton is not necessarily consistent with the vision for the area held by the Wilton Parklands Group (West Wilton Landowners). Given the number of land owners in the West Wilton area, it is recommended that Council lead the LEP Amendment process.
- In terms of the proposed employment precinct at Maldon, it is noted that much of the existing industrial land has not yet been developed for this purpose. Council's experience is that property owners are reluctant to rezone land for industrial purposes given the demand for residentially zoned estates and relative land values. Hence Council questions the likelihood of a proponent led rezoning of land. Council has previously rejected a planning proposal to rezone land for



industrial purposes in this area. The reference to a Heavy Industrial zoning, which under the standard LEP instrument, permits industry of a hazardous or offensive nature is also questioned.

### **2.3. Planning Proposals in areas outside the Priority Precincts**

The Analysis provides commentary on the known planning proposals not located within the priority precinct.

In relation to the Station Street Planning Proposal in Menangle, the Analysis suggests “small scale development in Menangle Village in line with the existing post-Gateway planning proposal can be supported by the existing infrastructure and transport network”.

In relation to the Planning Proposals in Appin, the Analysis suggests the rural setting of Appin Village should be protected “with only small scale expansion taking place, in line with existing post- Gateway planning proposals”. The Analysis makes references Appin East as a known Planning Proposal.

- Given the relative size of the various Planning Proposals, it is unclear which proposals the Department consider to be ‘small scale’. It is suggested that the reference in the Preliminary Strategy and Analysis to ‘small scale expansion taking place, in line with existing post – Gateway planning proposals’ be replaced with a reference to ‘moderate expansion in line with Council’s adopted Growth Management Strategy’. If this approach was adopted, the Gateway approval process would still act as a safe guard for the Department to ensure inappropriate proposals do not proceed to detailed assessment stage.
- Regarding the Station Street Planning Proposal the commentary should be adjusted to reflect that some infrastructure is required to support this proposal. The following amendment is suggested. “Moderate development in Menangle Village in line with Council’s adopted Growth Management Strategy can be supported by the existing infrastructure and transport network provided alterations to local infrastructure identified in the proposal are undertaken and funded”.
- The reference to Appin East as a known Planning Proposal should be removed. Council has not received a Planning Proposal for this land consequently it has no formal status.

### **2.4. Social Infrastructure**

The Analysis summarises the social infrastructure, including health facilities, that can be found in the investigation and surrounding areas. The need for an Integrated Health Facility for the Wilton Priority Precinct and a Primary Health Care Clinic for Menangle Park / Mt Gilead is recognised in the Analysis.

Poor air quality is listed as a major health concern for new residents. To combat the risk, it is proposed to establish a Priority Growth Area Air Technical Working Group consisting of various state agencies including NSW Health and Transport for NSW.

#### **Comments:**

- During the development of the Wilton Junction Master Plan, NSW Health suggested that hospital care services needed by new residents is best met through increased capacity at existing hospital facilities (e.g., Liverpool, Campbelltown, Camden & Bowral District Hospitals) and that public health care



for Wilton Junction will be supported through the development of an Regional Integrated Primary & Community Care Centre. Given the total population estimated across the two Priority Precincts and into the future (e.g., beyond 2036) it is suggested that Government re-consider the benefits of a new hospital at Wilton. The acquisition of land within the Wilton Priority Precinct as a future hospital site should be included in any State Planning Agreement.

- The following notable social infrastructure should also be referenced in the Land Use & Infrastructure Analysis - Picton High School, Camden High School, the Cemeteries (Catholic and Anglican) at Appin and Wilton, Picton Ambulance Service, Picton RFS, Wilton RFS, Wollondilly Leisure Centre, Bingara Golf Course, Antill Park Golf Course, Studley Park Golf Course and Mt Annan Leisure Centre.

## **2.5. Draft Amendment to State Environmental Planning Policy (Sydney Region Growth Centres)**

It is proposed to amend the Growth Centres SEPP by referencing and mapping the two Priority Precincts as Growth Centres and recognising the Greater Macarthur Land Release Strategy as a "growth centre structure plan". The existing provisions of Council's LEP will continue to apply to development of land in the proposed growth centres until Precinct Plans are developed and incorporated into the Growth Centres SEPP.

### **Comments:**

- The desired future character outlined in the Wilton Junction Master Plan developed by Council should be reflected in any Precinct Plan. Council also seeks an assurance that any Precinct Plan will incorporate suitable density cap provisions to avoid the forward planning issues being experienced in the existing Sydney Growth Centres.
- The Bingara Gorge Master Plan is based upon a cap of 1165 lots. Any re-examination of the density for urban development at Bingara Gorge needs to consider the existing infrastructure constraints. The Department also needs to consider the relevant resolutions of Council regarding the desired future character of Bingara Gorge prior to finalisation of the Precinct Plan. Further the Department is advised that there is a current Land and Environment court case against Council's deemed refusal of a development application purporting to seek an increase to the 1,165 dwelling cap.

In addition to the above comments it was also resolved by the Council at its meeting of 16 November 2015 that the following additional comments also be forwarded to the Department for their consideration. The list below not only includes direct feedback to sections contained within the preliminary strategy but also takes into the account the broader regional context.

- Council is supportive of a new town at Wilton
- The co-existence issue with mining needs further resolution so that key infrastructure and the town centre are not delayed
- Key infrastructure including rail electrification, Spring Farm Link and bus corridors are essential to the success of Greater Macarthur and upgrades to the Southern Highlands

- Appin bypass is also essential and should be part funded by urban growth in Campbelltown (Menangle Park and Mount Gilead)
- Council opposes the inclusion of a proposed double lane road from Menangle Park through to Douglas Park, which will need to be constructed over the Nepean River, under a heritage listed rail bridge and through a village that does not have the space to accommodate four lanes and falls within a with a Landscape Conservation Area.
- That the State Government be requested to confirm with RMS and the Federal Government to formalise where future roads and rail infrastructure is going to be placed.
- The increase in the developer contributions cap from \$20,000 to \$34,000 plus indexation is essential to enable Council to ensure local infrastructure is provided at required levels using the National Growth Areas Alliance Data
- Council's preference remains that health services are provided through a new hospital using National Growth Areas Alliance data to guide decision making
- Council's Growth Management Strategy be re-considered in light of the development forecast in the Campbelltown local government area and likely traffic and other impacts
- Council write to the JRPP and raise concern about the appropriateness of considering the Station Street Planning Proposal before 2036 given the lack of suitable infrastructure and impending growth in Menangle Park
- The increase in dwelling numbers requires re-consideration of infrastructure provision and sequencing. Re-examination of social infrastructure is also required.
- Council request the Wilton Structure and Draft Vision Structure be amended to reflect the Wilton Junction Master Plan
- Council opposes the land north of Douglas Park being identified as an future industrial site given:
  - Air quality issues previously identified in the Macarthur South Regional Study 1991,
  - The scenic quality of the area and proximity to the Nepean River,
  - The isolation from road and rail infrastructure,
  - The extent of employment lands identified elsewhere in the study area in particular Maldon.
- Council also opposes the map reference called Douglas Park North.
- Beyond 2036, the Department of Planning investigate growth options consistent with Council's Growth Management Strategy which seeks preservation of agricultural land, biodiversity conservation and rural living through the separation of towns and villages in line with Council's desire for classification as a peri-urban area.
- Council supports the classification of Class 2 soils as encumbered land and recognises its value as a resource which benefits from a water allocation from the Nepean River



- Council supports agriculture being identified as a prominent land use in the study area and considers it to be an important provider of employment which has a multiplier effect
- The Department of Planning be advised that Council supports an application to establish a National Park / Reserve in the Nepean Gorge adjacent to West Wilton and hence a significant buffer is required to protect the Gorge from the impacts of development.
- Further threshold testing be conducted by the Department of Planning to ascertain the need for a civic centre at Wilton and capacity of existing cemeteries
- The Air Quality Study which is part of a future DA for a Gas Plant proposal at Douglas Park be forwarded to the Priority Growth Area Technical Working Group when it becomes available
- Council oppose any Sewer infrastructure Augmentation and Upgrade Plan which involves piping across Rivers and Gorges given the environmental risk and visual impact
- Council request that the Wilton Junction Precinct rezoning be placed on public exhibition as soon as possible. At the latest the rezoning should be placed on public exhibition concurrently with the Greater Macarthur Land Use and Infrastructure Strategy, currently timetabled for early 2016. This will ensure that the delivery of the new town, including housing supply, jobs and required infrastructure not be further delayed.

Council wishes to acknowledge the collaborative approach taken on this project and looks forward to continuing the partnership with the Department of Planning and Environment, and Campbelltown Council. If you have any questions or would like further information please contact Adam Gray (Growth Centres Coordinator) on 4677 9650.

Yours sincerely,



Luke Johnson  
**General Manager**