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Re: Greater Macarthur Priority Growth Area

Dear Gina,

As outlined in my email to you on 31 August 2016, EMM Consulting Pty Ltd acts on behalf of SouWest Developments Pty Ltd who controls approximately 577 hectares of land in Menangle (refer attached Figure 1). A review of the recently exhibited Greater Macarthur Priority Growth Area (GMPGA) has revealed that our client's land falls outside its proposed boundary.

We wish to make a formal submission and provide additional background as to why we believe that the land is suitable to accommodate employment generating and residential development and is worthy of including in the GMPGA.

1 Macarthur South Investigation Area

All of our client's land was included in the Macarthur South Investigation Area (MSIA) in *A Plan for Growing Sydney* and identified as being suitable for urban development. It is located within the Menangle and Douglas Park Precinct within the MSIA (refer attached Figures 2 and 3 and Appendix A). The land straddles the M5 freeway and has several kilometres of Motorway frontage (on both sides) as well as several kilometres of Nepean River frontage.

The Menangle and Douglas Park Precinct states that:

"The precinct has a total of 133 ha of land suitable for future residential development, with a further 346 ha which is currently encumbered but could possibly be developed, subject to appropriate rezoning pathway steps identified in the Greater Macarthur Land Release Preliminary Strategy and Action Plan being undertaken."

Our client has undertaken a number of technical studies to assess the suitability of the land to accommodate both employment generating and residential development. Part of the site, approximately 38 hectares of land (Lot 201 and 202 on DP 590247 and Lot 21 on DP 581462 shown on Figure 1), has recently received favourable consideration from the Sydney West Joint Regional Planning Panel (SWJRPP) for a planning proposal seeking residential development and a neighbourhood centre. Within the Precinct Analysis for the Menangle and Douglas Park Precinct this land is shown as a 'Known Private Proposal – Station Street, Menangle' proposing 350 new residential lots. The remainder of the land, on the eastern side of the motorway, predominantly falls into the category of 'Land encumbered by constraints which are resolvable with appropriate environmental or staging measures' (refer Figure 31 of Appendix A).

Therefore the MSIA clearly supports the development of our client's land for both employment generating and residential development, which is clearly illustrated on Figure 31 – Menangle and Douglas Park Urban Suitability. The supporting text within Chapter 5 of the document (refer Appendix A) clearly demonstrates the NSW State Government's intentions for this land and its suitability for future urban development.

2 Site suitability for the Greater Macarthur Priority Growth Area

With the SWJRPP recently providing its support for the planning proposal to allow residential development (and neighbourhood centre) on the three lots on the western side of the motorway it is evident that this land is worthy of including in the Greater Macarthur Priority Growth Area boundary.

As previously stated, our client has undertaken a number of investigations that have clearly demonstrated that the remainder of the land can accommodate around 250-300 hectares of employment generating development. The suitability of the land for this type of development can be summarised as follows:

- the land is a large land holding controlled by one entity which will positively facilitate the timing and delivery of new employment lands in accordance with the Menangle and Douglas Park Precinct under the MSIA;
- the land will, in the near future, be the beneficiary of significant infrastructure, with the first of two sewer pump stations being constructed in Menangle Park (refer Table 16 of Appendix A) and future electricity and gas mains being planned/constructed for Urban Growth/Campbelltown City Council's Menangle Park development;
- the land is very accessible and is within close proximity to both the future M9 Outer Sydney Orbital and Spring Farm Parkways and the second Sydney Airport, with existing rail and road links also traversing the land;
- the land completely surrounds the existing Menangle Train Station;
- as highlighted in the MSIA ,riparian water rights affect the land that will allow the establishment of a regional Waste Water Treatment Facility to be established and Sydney Water have expressed strong interest in this facility;
- there are no known Aboriginal sites on the land ;
- initial assessments have identified that much of the land is not subject to flooding;
- only the land adjoining the Nepean River has been identified as moderate constraint biodiversity; and
- the land is well located to provide employment opportunities for people living in the south west.

As highlighted in the MSIA, any constraints that may arise as a result of further detailed technical studies will be resolvable with appropriate environmental or staging measures.

3 Conclusion

The land, after detailed analysis (see attached Appendix A – excerpt from the Greater Macarthur Land Release Investigation), was identified as being suitable for future urban development within the Menangle and Douglas Park Precinct of the MSIA. However, under the recently exhibited Greater Macarthur Priority Growth Area it has been excluded from the area's boundary.

In view of the justification summarised in Section 2 above, we believe that our client's land in Menangle is worthy of consideration for inclusion in the Greater Macarthur Priority Growth Area. Our client is very happy to provide you with the technical studies that have been undertaken to date which clearly demonstrate that the land is suitable for both employment generating and residential development.

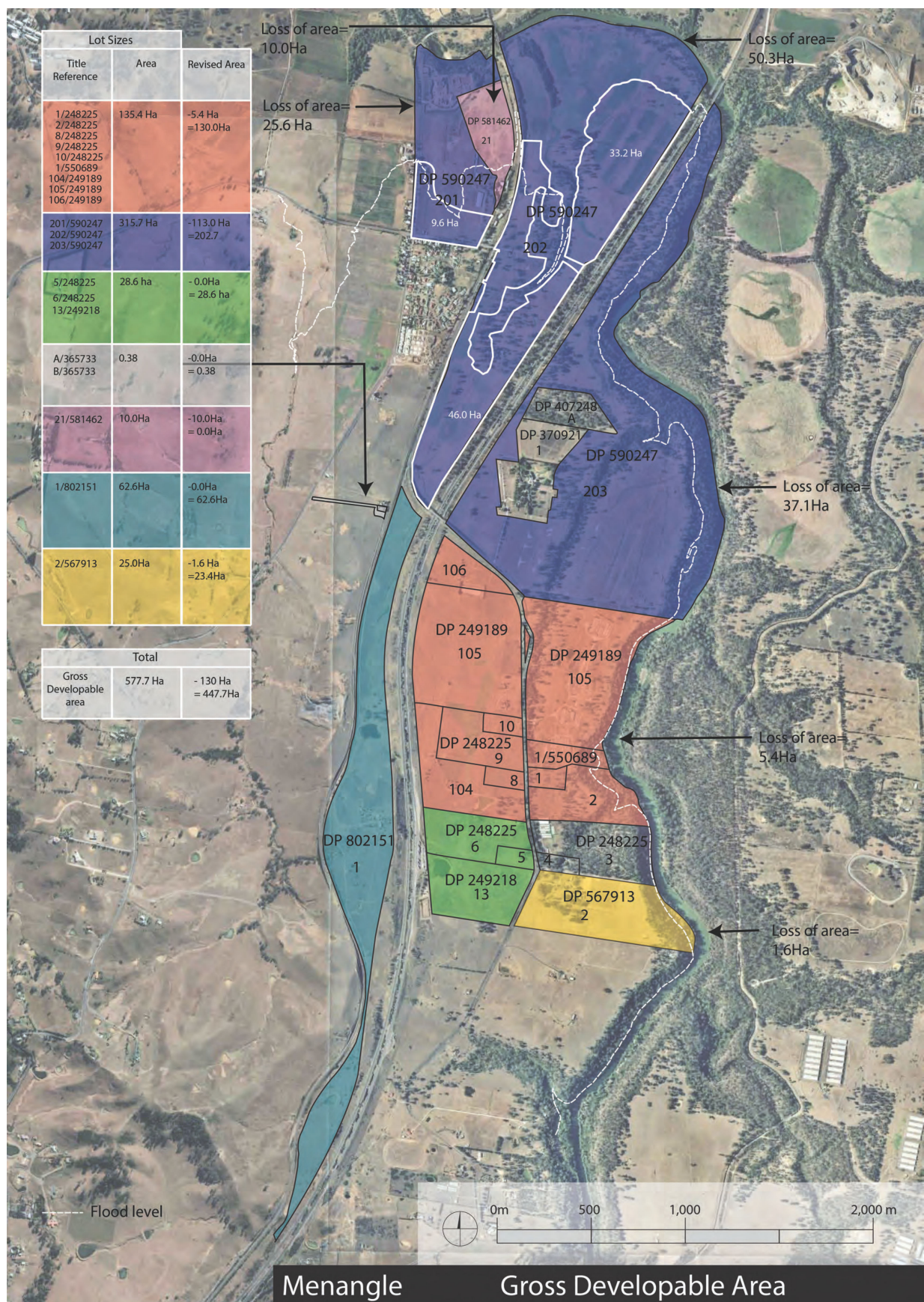
It would appear that the detailed investigations that were carried out in the MSIA have not been taken into consideration and the inclusion of the land in the GMPGA has been overlooked. Given this, we seek your clarification as to why the land has been excluded from the boundary and whether it can now be reinstated to facilitate future urban development opportunities in line with those outlined in the MSIA.

If you require any additional information please do not hesitate to contact me on 9493 9528 or 0434676913 or via email.

Yours sincerely



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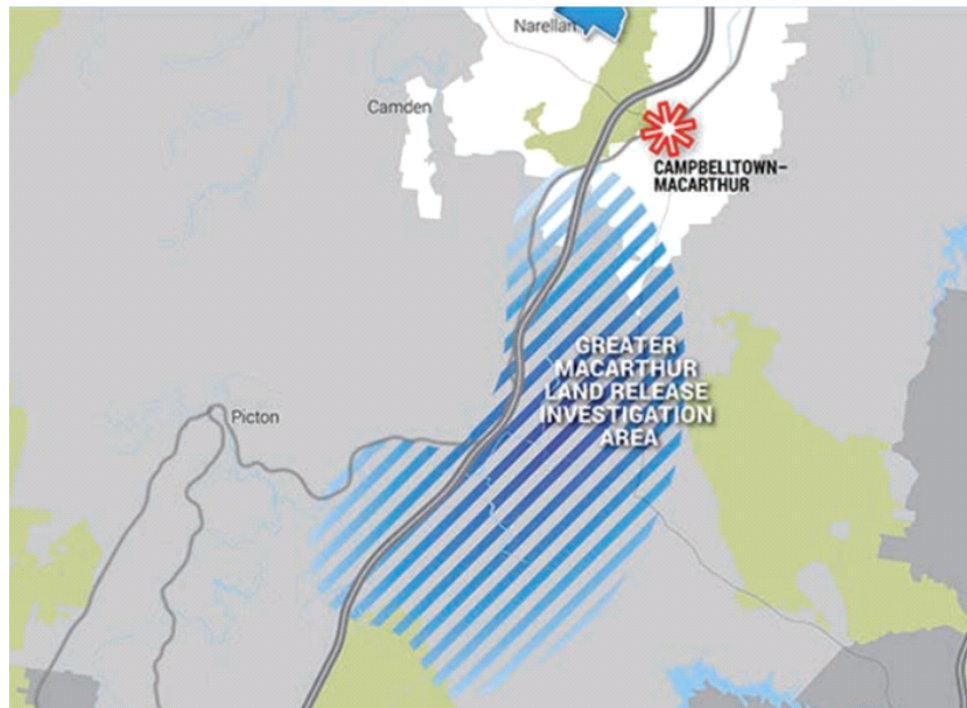


Figure 2: Greater Macarthur Land Release Investigation Area (A Plan for Growing Sydney)

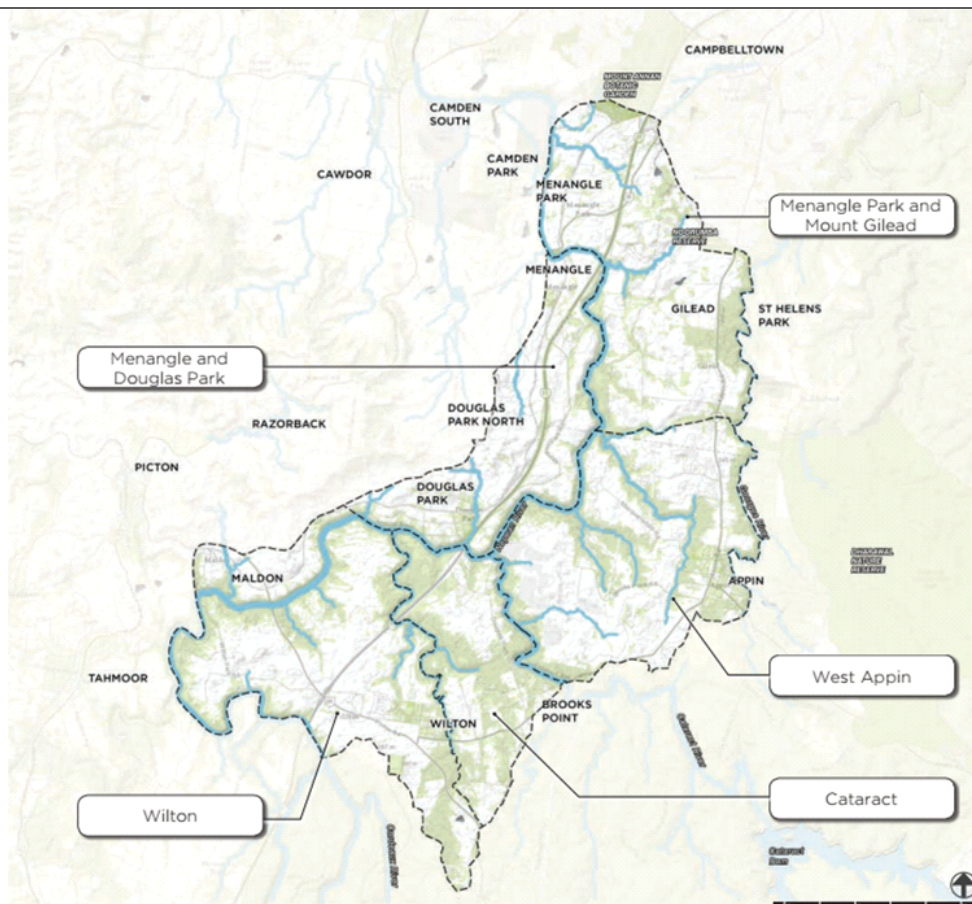


Figure 3: Greater Macarthur Precincts

Appendix A

Greater Macarthur Land Release Investigation



Menangle and Douglas Park

The Menangle and Douglas Park Precinct is located in the western portion of the GMLRIA and has an area of approximately 2,378 hectares. The precinct is bounded by the Nepean River to the north, east and south and Menangle Road to the west.

The majority of the precinct is characterised by rolling hills with gorges adjoining the Nepean River and its tributaries. The topography to the west of the precinct is considerably more variable associated with the Razorback Range. While the majority of the precinct is cleared for agricultural and residential purposes, areas surrounding waterways are fairly densely vegetated.

If strategic opportunities were pursued beyond 2036, suitable land uses in this precinct would be a mix of residential and commercial uses with a new centre at Douglas Park North suitable for strategic industrial uses. The identified significant vegetation around waterways will be conserved.

The precinct could contain three centres:

- ▶ Menangle – a village centre with approximately 5,000m² of retail GFA;
- ▶ Douglas Park North – a specialised employment centre with approximately 10,000-20,000m² of employment uses GFA; and
- ▶ Douglas Park – a local centre with approximately 10,000m² of other office and retail GFA.

Key Land Use Constraints

- ▶ **Mining** – the majority of the precinct has either been previously subject to coal mining or is planned for mining for the next 7 years. For development to occur in this area, it would need to occur after mining operations have ceased or proposals will need to demonstrate that they comply with the relevant rezoning pathway steps.
- ▶ **Heritage Conservation** – the precinct contains a number of existing heritage items and known Aboriginal sites. Further investigation would be required to ensure the significance of these heritage items and sites are retained with the heritage character of Menangle being retained.
- ▶ **Poultry Cluster** – there is a significant cluster of poultry shed located within the precinct around the Douglas Park North centre. Proposals to develop within this area would be required to demonstrate that they comply with the relevant urban suitability processes.

The areas which fall under the three categories of suitability for development in the precinct are shown in Figure 31 – Menangle and Douglas Park Urban Suitability.

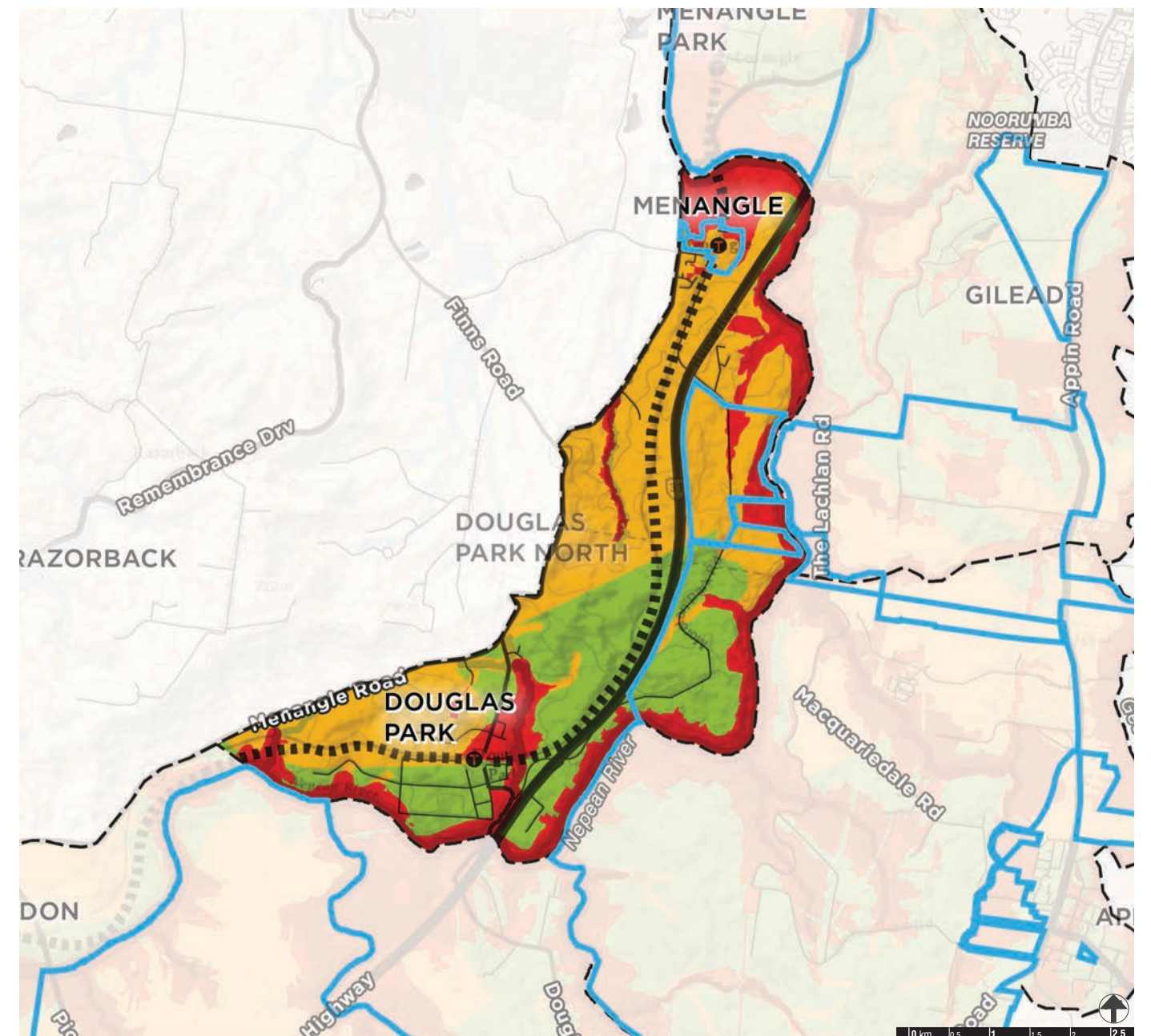


Figure 31 Menangle and Douglas Park Urban Suitability

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

Precinct Analysis

Yield

The precinct has a total of 133 ha of land suitable for future residential development, with a further 346 ha which is currently encumbered but could possibly be developed, subject to appropriate 'rezoning pathway' steps identified in the *Greater Macarthur Land Release Preliminary Strategy and Action Plan* being undertaken. These combined areas are anticipated to accommodate approximately 7,200 new dwellings.

The precinct has a total of 226 ha of unencumbered land suitable for future employment uses and a further 270 ha of encumbered land.

Known Private Proposals

There are three known private proposals in the precinct:

- ▶ Moreton Park Road, Menangle (refused by JRPP) – proposed up to 340 new residential lots, and 240ha of employment area;
- ▶ Station Street, Menangle – proposes 350 new residential lots; and
- ▶ West Appin Study Area (including three individual planning proposals) proposes up to 18,000 new residential lots, 99,000m² of commercial GFA and 372.6ha of industrial area.

Infrastructure Requirements

The long term transport infrastructure needed for the precinct is included Table 16 Menangle and Douglas Park Long Term Transport Infrastructure.

A preliminary infrastructure assessment has identified infrastructure upgrades required to support the precinct's growth capacity. Refer to Table 17 Menangle and Douglas Park Long Term Services Infrastructure.

Infrastructure Funding Mechanism

Infrastructure requirements will need to be delivered through an appropriate mechanism, which could take the form of a Special Infrastructure Contribution (SIC) at no cost to government or a series of planning agreements entered into between the Minister for Planning and the relevant proponents.

Item	Description	Drivers
Southern Highlands Rail Line	Electrification of the Southern Highlands Rail Line between Menangle and Maldon.	<ul style="list-style-type: none">▶ Provide greater public transport connections from the study area to employment areas in the Sydney Metropolitan Area▶ Reduce car dependency and alleviate traffic on road network.
Macquariedale Road/Finns Road Upgrade	New four land arterial road in place of existing local road. Includes connection from Appin to Menangle Road, including full interchange with the Hume Highway and connection with Moreton Park Road.	<ul style="list-style-type: none">▶ Serve as the main east-west connection through the central area of Greater Macarthur▶ Provide improved access to the Hume Motorway and relieve traffic loadings on parallel north-south corridors (Appin Road and Menangle Road)▶ Improve cross-regional connectivity between Appin and Camden▶ Improve access to Douglas Park and new centre to the north

Table 16 Menangle and Douglas Park Long Term Transport Infrastructure

Infrastructure type	Upgrades
Electrical	<ul style="list-style-type: none">▶ Establishment of a Morton Park Zone Substation.
Water	<ul style="list-style-type: none">▶ A new 6ML water storage tank located near Douglas Park North.
Sewer	<ul style="list-style-type: none">▶ A new 37kW pumping station.▶ A new 232kW pumping station.
Education	<ul style="list-style-type: none">▶ Primary school in Menangle.▶ High school in Douglas Park.
Emergency Services	<ul style="list-style-type: none">▶ Ambulance standby point.▶ Police shopfront in town centre.
Open Space	<ul style="list-style-type: none">▶ Regional park.▶ District park.

Table 17 Menangle and Douglas Park Long Term Services Infrastructure

Menangle and Douglas Park Assessment against Action 2.4.2

Issue to be considered	Assessment
The value of land for drinking water supply, agriculture, environmental management, resources, tourism and other purposes.	<ul style="list-style-type: none"> ▶ Areas of significance and value have been identified and mapped. ▶ Any development would be required to avoid impacts to these areas or follow relevant processes pathway steps to ensure the land is suitable for urban development.
Constraints to development, including environmental hazards and natural hazards.	<ul style="list-style-type: none"> ▶ Significant biodiversity areas have been mapped and proposals will be required to follow prescribed processes (such as bushfire APZs around vegetation) should development occur in these areas.
Private sector interest in developing particular land.	<ul style="list-style-type: none"> ▶ The precinct contains three known private proposals: West Appin Study Area and Station Street, Menangle, Moreton Park Road Menangle Employment Lands*. ▶ The investigation has taken these proposals into consideration. The preliminary strategy identifies the possibility for small scale growth at Menangle Village in line with the existing post gateway planning proposals.
Proximity of land to current and planned locations of employment.	<ul style="list-style-type: none"> ▶ The development of town and village centres in the precinct would be required to provide employment opportunities and social infrastructure. There is potential for a specialised employment area at Douglas Park North. ▶ Significant transport infrastructure projects would provide greater accessibility to employment areas and social infrastructure facilities within and outside of the precinct, including Campbelltown-Macarthur Regional City and the Broader Western Sydney Employment Area.

Issue to be considered	Assessment
The cost of infrastructure provision including roads, water, sewerage, public transport, schools and health facilities.	<ul style="list-style-type: none"> ▶ The investigation has identified utility and social infrastructure that would be needed to service growth in the precinct. ▶ Large scale land release would trigger the need for a new east-west connection to the Hume Highway with a potential alignment along Macquariedale Road, including a new bridge over the Nepean River and an interchange at the Hume Highway. ▶ The cost of these works would be significant and the level of investment required is not currently cost effective. ▶ Strategic transport infrastructure currently under investigation, such as the Outer Sydney Orbital and upgraded Hume Highway, could make land release cost effective in the longer-term. ▶ 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.
The economic and social cost to communities of having relatively poor access to employment and services.	<ul style="list-style-type: none"> ▶ The investigation has identified social infrastructure needed to service an increased population in the precinct. ▶ The development of town and village centres and a specialised employment centre in the precinct would be required to provide employment opportunities and social infrastructure. ▶ Significant transport infrastructure projects would be required to provide greater accessibility to employment areas and social infrastructure facilities outside of the precinct, including Campbelltown-Macarthur Regional City and the Broader Western Sydney Employment Area.

* It should also be noted that on 19 May 2015 Wollondilly Shire Council resolved to not support the inclusion or consideration of any land west of the Nepean River – including land in the planning proposal for employment lands at Moreton Park Road, Menangle – as part of the high level infrastructure investigation currently being undertaken for a potential West Appin Masterplan.

Table 18 Menangle and Douglas Park Assessment against Action 2.4.2