

21 September 2016

Our Ref: 15-210

Brendan O'Brien
NSW Department of Planning & Environment
23-33 Bridge Street,
Sydney, NSW, 2000

Dear Brendan,

RE: GREATER MACARTHUR PRIORITY GROWTH AREA

City Plan Strategy & Development Pty Ltd (CPSD) acts on behalf of the owners of 430 - 490 Douglas Park Drive, Douglas Park. CPSD has been engaged to consider and advise on the NSW Department of Planning & Environment's (DPE) Greater Macarthur Priority Growth Area investigations in relation to the abovementioned allotment (the subject site).

The subject site forms part of Stage/Precinct Number 6 'Cataract' as identified in AECOM's *Staging Technical Report*. The report concluded that Stage 6 could:

- Provide an urban capable area measuring 680 hectares;
- Provide an estimated 10,200 dwellings;
- Accommodate an estimated urban population of 26,520 people; and,
- Be delivered with infrastructure at a cost of \$6,696 per dwelling, which represents the second least costly stage of all six stages proposed within the entire investigation area.

CPSD provided a submission to DP&E on behalf of the land owners of the subject site (dated 12 November 2015), advocating for the inclusion of Stage 6 within the proposed Greater Macarthur Urban Area

The *Greater Macarthur Land Release Investigation - Consultation Update* (DP&E, June 2016) summarised and responded to all public submissions. The Consultation Update concluded that Stage 6 should not be included for the purposes of urban development as servicing costs would be too high. However, small scale development could be supported in Stage 6 through local planning studies, such as the Wollondilly Growth Management Strategy.

For reference, the relevant extract of the Consultation Update is provided below:

Requests for inclusion within the Wilton Priority Growth Area	Response
<ul style="list-style-type: none"> 430 to 490 Douglas Park Drive – landowner requests inclusion in the growth area, arguing site is unencumbered by environmental constraints and (combined with the neighbouring St Mary's Retreat Centre) can provide a large number of dwellings. The submission argues the land adjoins existing suburban development and can be cost effectively serviced. (St Mary's Retreat Centre is not a party to the submission and has not made an individual submission.) 	<p>The sites are located within the Cataract precinct. While there are pockets of land identified as suitable for urban development, these are isolated from the Wilton Priority Growth Area by waterways and significant vegetation.</p> <p>Servicing large scale development in the precinct is considered costly. The high level utilities servicing study indicated that this land would likely be serviced last in an efficient utilities rollout.</p> <p>The Cataract precinct will remain rural in nature to provide green separation between the new town and the Sydney metropolitan urban area.</p>
<ul style="list-style-type: none"> 20 Macarthur Drive – owner requests inclusion in growth area on the grounds that the site has potential for development and is serviced by utilities. 	<p>Small scale development that is consistent with the rural setting can be pursued through local planning processes, informed by the Wollondilly</p>
	Growth Management Strategy.

Figure 1: Extract of DPE response to CPSD submission in relation to subject site (Source: Greater Macarthur Land Release Investigation: Consultation Update, June 2016, page 12 - 13)

The reasoning for excluding the subject site and Stage 6 from the urban area would appear to be at odds with AECOM's Technical Study. In this regard, and given the increasing prices of land throughout the Sydney metropolitan area, we strongly recommend that DP&E include Stage 6, including the subject site, as part of the Greater Macarthur urban area. This would assist with housing affordability and provide additional housing opportunities in an area which is traditionally sought after by first home buyers.

In the event DP&E remains of the opinion that Stage 6 should not be included as part of the urban area, we request that DP&E consider Stage 6 for large lot type subdivision. This could be pursued in the form of a R5 - Large Lot Residential statutory zoning, and a minimum lot size of 4000m². It is noted that the Wollondilly Local Environmental Plan 2011 currently adopts both these statutory controls.

The R5 zone with a 4000m² lot size would ensure lot production occurs at an appropriate rate and size to accommodate onsite sewer reticulation services. Given the subject site is already serviced by roads, water and electricity, such a zoning and minimum lot size will ensure primary infrastructure costs are low. In this particular case, it will assist to increase housing supply.

In conclusion, we request that DP&E reconsider its recommendation in relation to the subject site and Stage 6 in accordance with AECOM's Technical Study. As a minimum, we request the adoption of a R5 - Large Lot Residential zone and minimum 4000m² lot size for Stage 6.

Should you wish to clarify any of the information provided above, please contact the undersigned on 8270 3514 or via email carlod@cityplan.com.au.

Yours Sincerely,



Carlo Di Giulio
Associate Director