

8 February 2019

NSW Department of Planning
GPO Box 39
SYDNEY NSW 2001

Submitted online: http://planspolicies.planning.nsw.gov.au/index.pl?action=view_job&job_id=9719

Dear Sir/Madam

Submission: Greater Macarthur 2040: An Interim Plan for the Greater Macarthur Growth Area

We would like to thank the Department of Planning and Environment (DPE) for the opportunity to make this submission to the *Greater Macarthur 2040: An Interim Plan for the Greater Macarthur Growth Area*, hereinafter referred to as the "Plan".

We make this submission in relation to the land our client has interest in known as 875 Wilton Road, Appin (Lot 3, DP 249286), hereinafter referred to as the "Subject Site". We have also consulted the landowners Mr Everard and Mrs Deidre D'Arcy. The Subject Site is in order of 25 acres, located approximately 400m south-west of the existing residential township of Appin and is directly accessible to existing road infrastructure being Wilton Road. The Subject Site has a road frontage of approximately 200m that enjoys elevated district views then gently sloping down to the rear boundary. The Brooks Point Road (Appin) Planning Proposal currently on exhibition with Wollondilly Shire Council is located to the north. Refer to location image below.

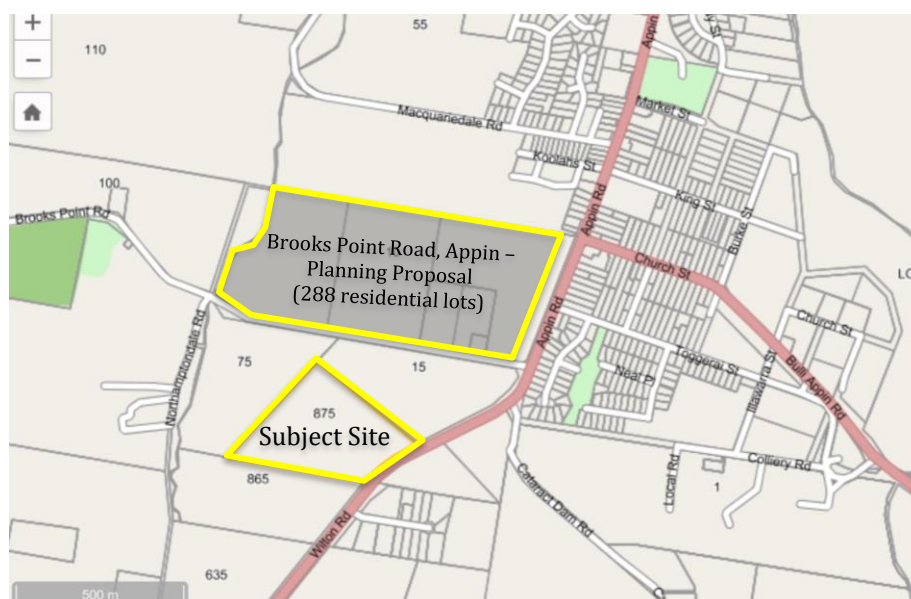


Image 1: Identifier Map

We support the work undertaken the DPE in planning for the future and for the land release for the Greater Macarthur Growth Area. We are encouraged by the principles behind the creation of the Greater Macarthur Structure Plan (land release areas) and provide below an extract of the this plan for further ongoing reference.

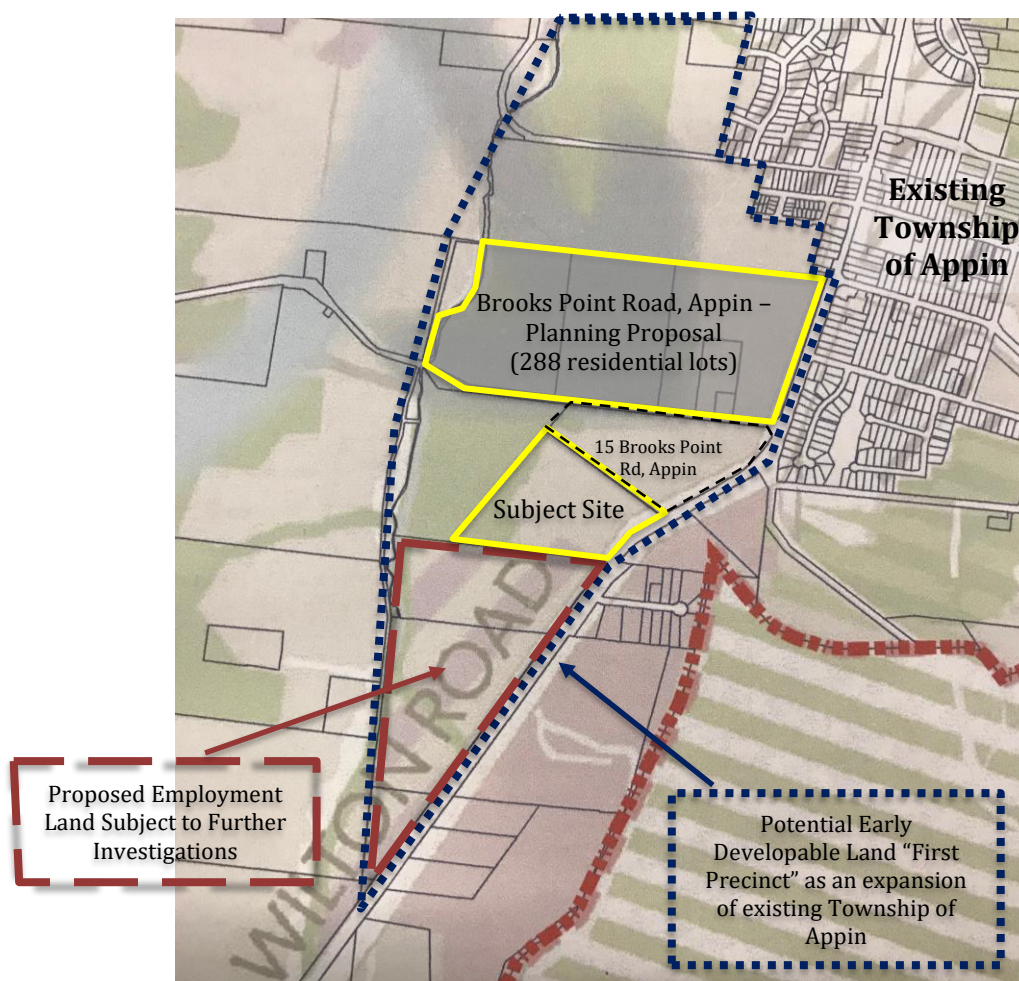


Image 2: (Extracted from the Plan) Greater Macarthur Structure Plan and Potential First Precinct

We outline our observations and proposed considerations below in light of the Plan and it's Vision at this strategic milestone:

Vision 1: Place

The Subject Site and neighbouring sites could be considered developable as an early precinct in the overall Plan. Such a precinct would expand on the existing township of Appin to create and stimulate the community with additional housing needs.

Proposed Consideration 1: Identify and establish a first initial "Precinct" to advance the future required planning and infrastructure investigations to activate and grow the existing township of Appin.

Vision 2: Landscape

The Subject Site has been identified as Urban Capable Land in the Plan with a small proportional area to the rear boundary noted as “Subject to the Final Cumberland Plain Conservation Plan” or otherwise bushland biodiversity protection. We do not believe the area suggested for potential bushland biodiversity protection is warranted and that a high-level conservative approach may have been adopted without on-site specific investigations and analysis.

We recognise the DPE is undertaking strategic conservation planning, which will be delivered via the Cumberland Plain Conservation Plan (CPCP). We appreciate the aim to balance biodiversity impacts in the bio-certified areas through a range of conservation measures, including protection of high conservation value core and corridor areas. We do not consider the bushland on the Subject Site to be considered of high quality or significance in contributing to the core and corridor areas.

Proposed Consideration 2: We request the proposed biodiversity area on the Subject Site be removed and all the Subject Site land be identified as Urban Capable Land. This will also facilitate the appropriate urban design and potential road construction on the rear boundary if and as required to facilitate fire access to any potential future bushfire and APZ zones. As such, the additional SIC contributions payable could be allocated to more significant areas needing protection.

Vision 3: Built Form

As mentioned, the Subject Site resides on high land from Wilton Road, sloping gently to the rear boundary. The land and its landscape provides opportunity for medium density residential and/or could provide low to medium rise aged care or senior living opportunities.

Proposed Consideration 3: We request the considered height controls accommodate low to medium rise product, particularly along Wilton Road.

Vision 4: Land Use

We support the land use in the Plan for the Subject Site to be Urban Capable Land.

We note again as above, the request to remove the proposed biodiversity land and allow all land as Urban Capable Land for residential uses. This compliments the proposed considerations as mentioned above, for an initial precinct to compliment the ongoing viability of the existing Appin township.

We refer to the Plan, *Figure 9: Indicative density distribution* (Image 3 included below) and raise our concerns that the proposed concentration of density could negatively impact the viability of the current Appin Township and community. Hence, we propose that consideration should be given that an additional zone for “medium density residential area” along the west side of Wilton Road as per

Image 3 below. This should be introduced to ensure the existing township and centre of Appin is maintained vibrant and economically stimulated. The Plan proposes the Indicative Density Distribution only along the Indicative Transport Corridor. This designated density alone has the potential to concentrate density and communities outside the existing township of Appin. As such may this would result in the degeneration of Appin’s long-term and existing local community.

Figure 9: Indicative density distribution

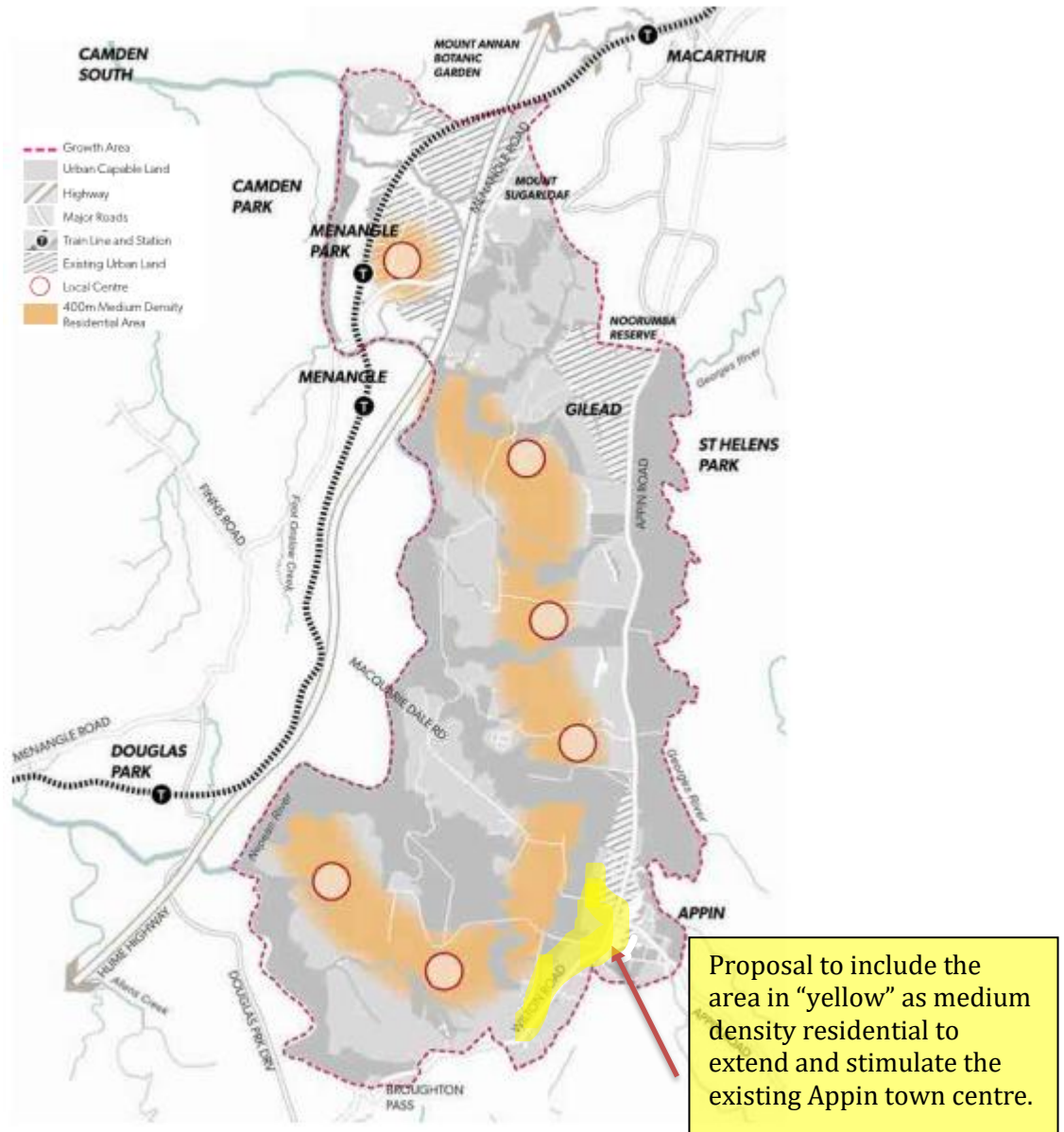


Image 3: (Extract from the Plan) Additional proposed medium density residential zone.

We also make the observation that the land to the south of the Subject Site (refer to Image 2) is noted as “Employment Subject to Further Investigation”. We are of the opinion that this land is not suitable for employment uses alone due to it’s limiting land area. Such a precinct with land area limitations will not create a critical mass for employment and business ongoing viability. Thus, we support the need for detailed economic analysis as part of the ongoing investigations.

Proposed Consideration 4: We request the entire Subject Site be defined as Urban Capable Land for medium density residential uses that may including but not limited to dwellings, multi-dwellings, aged cared and seniors living.

We request that the detailed investigations focus and review the economic viability of any employment lands and the more appropriate residential land use be applied to ensure the residential township of Appin is preserved, grown and stimulated into the future.

Vision 5: Movement

We recognise the need for upgrading of major roads and the introduction of a new transport corridor. The staging of upgrades to existing road infrastructure will be critical to the growth the local area. We highlight the Subject Site as being capable for development within the proposed first initial precinct due to the accessibility to existing road infrastructure.

We support contributing to infrastructure to deliver new homes, jobs, open space, transport infrastructure and services and note our general support for a Special Infrastructure Contribution (SIC). However, it is important to ensure that SIC levy rates remain affordable and do not impact on the feasibility of future development.

Proposed Consideration 5: A program of key road upgrades be clearly defined and linked to “precinct grouping” of development sites. The SIC levy ought only be applied to the nexus of additional infrastructure (and facilities) required. Accordingly, the future SIC levy rate should be reviewed is specific context. We note the DPE will exhibit a SIC scheme in due course as per others in the Growth Area, at which time we will provide further comment.

We welcome the opportunity to further discuss this submission with the DPE and extend our thanks again to be able to provide our strategic input for consideration.

Should you have any questions, please do not hesitate to call me on 0404 476 200.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Rick Alloggia', written over a horizontal line.

Rick Alloggia

Managing Director