



Greater Macarthur 2040 – An interim plan for the Greater Macarthur Growth Area

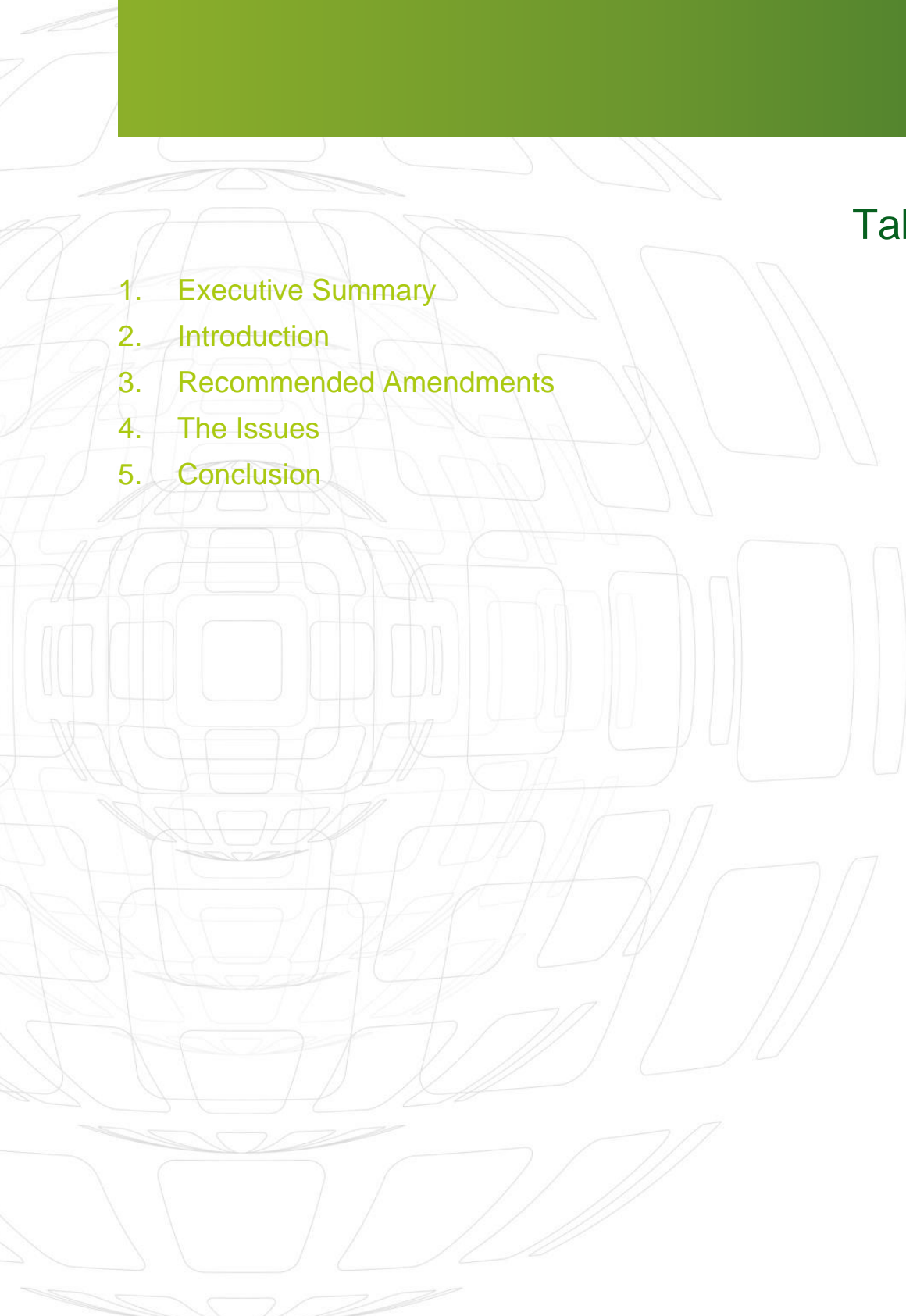
Submission on behalf of Dahua Group (Australia)

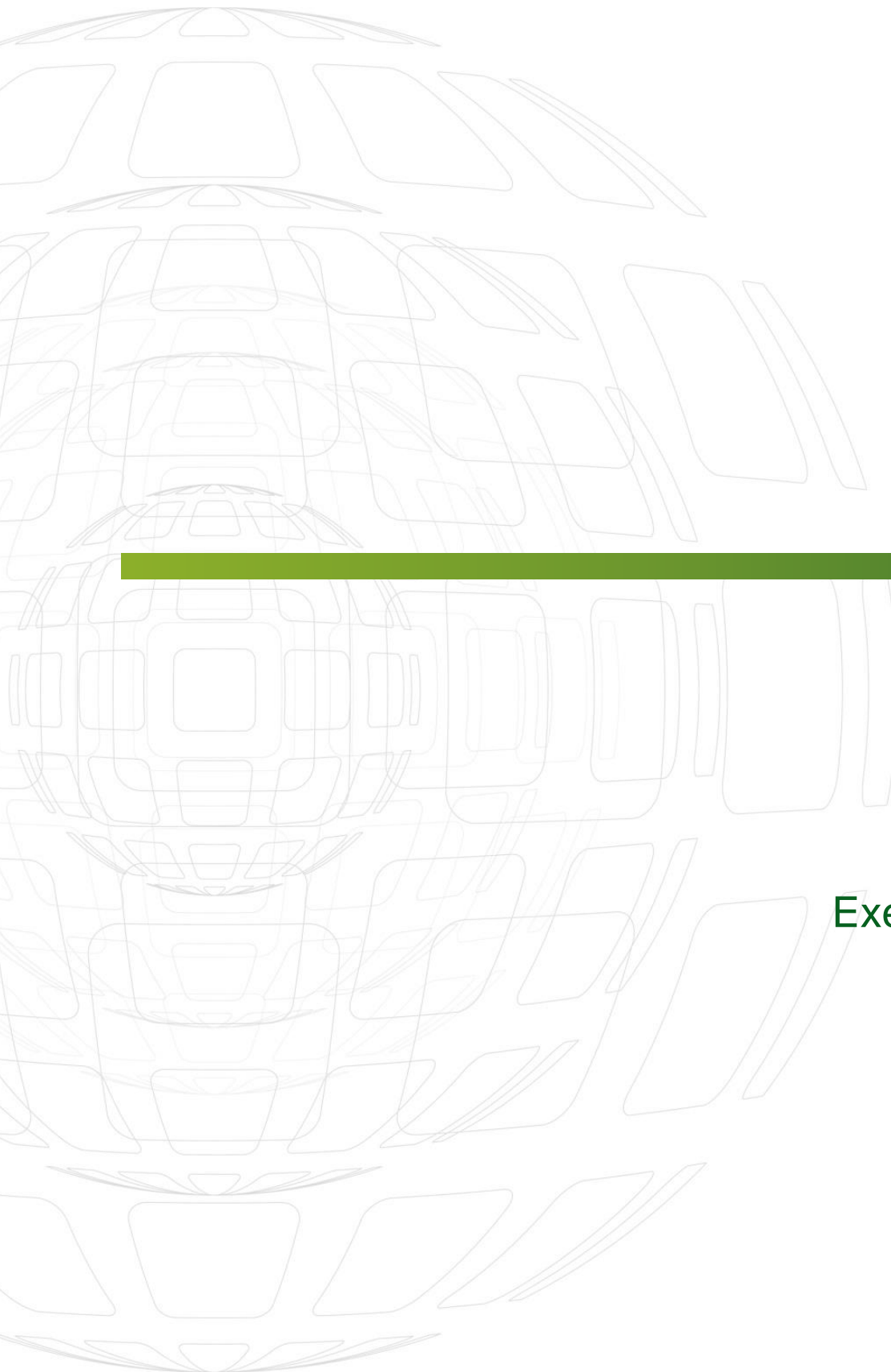
12 March 2019



Table of Contents

1. Executive Summary	4
2. Introduction	7
3. Recommended Amendments	14
4. The Issues	17
5. Conclusion	23





1

Executive Summary

1. Executive Summary

This submission has been prepared by APP Corporation Pty Ltd (APP) on behalf of Dahua Group (Aust) Pty Ltd (Dahua) in response to the public exhibition of the *Greater Macarthur 2040 - An interim plan for the Greater Macarthur Growth Area (Department of Planning and Environment, November 2018 (the draft Plan))*. Dahua are a major landowner within the Menangle Park Release Area (Menangle Park URA). Dahua welcomes and commends the Department of Planning and Environment (the Department) in releasing the draft Plan, which sets a long term vision for the Growth Area as it develops and changes.

There are however a few issues with the draft Plan which Dahua wishes to bring to the Department's attention. Parts of the draft Plan as it relates to the Menangle Park URA are already out of date. As the Department is aware, in November 2018, Dahua submitted a formal planning proposal to Campbelltown City Council (Council) relating to 507 ha of land within the Menangle Park URA. This included all land owned or under the control of Dahua and six (6) additional properties on the eastern side of Cummins Road owned or under the control of other landowners. The lodgement of this document followed the submission of a preliminary proposal to Council in May 2018 and more than 12 months of discussions with Council and the Department prior to this.

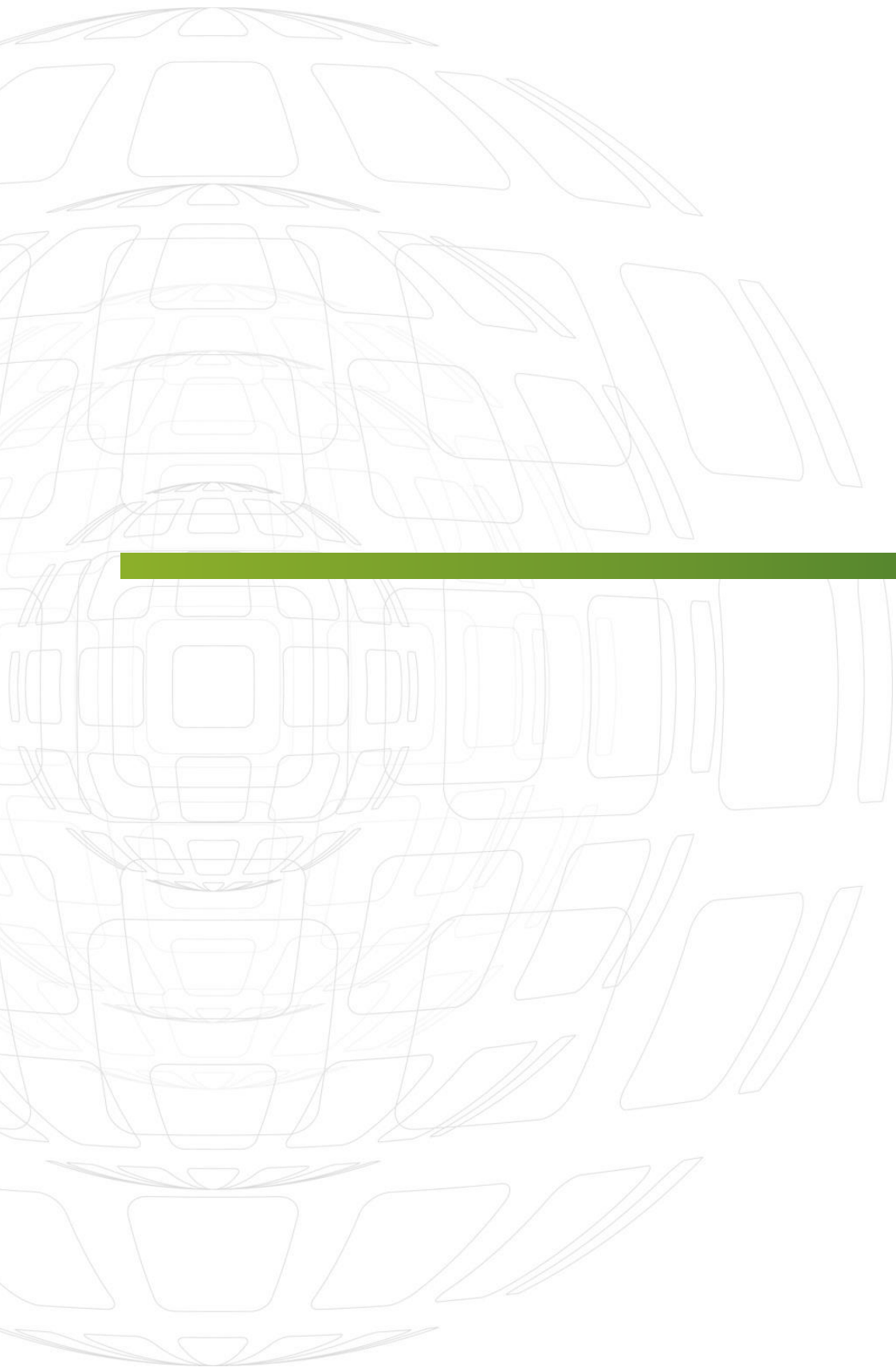
The planning proposal is accompanied by detailed planning, urban design and technical reporting including traffic and transport, biodiversity and open space, water management and social planning assessments. Much of this work relates to the whole Menangle Park URA – not just the land to which the planning proposal relates. The draft Plan describes additional work that will be undertaken for the Growth Area including the Menangle Park URA. This includes the preparation of conservation management plans, green plans, bushfire evacuation studies – all of which are likely to take considerable time to prepare. This has the potential to delay the assessment of and finalisation of Dahua's planning proposal. In relation to this aspect of the draft Plan, Dahua seek two things:

1. The draft Plan, where relevant, be updated to reflect the findings of technical studies (transport, bushfire, biodiversity strategy, open space and social infrastructure) undertaken to support the planning proposal as they relate to both the site (the subject of the planning proposal) and the broader Menangle Park URA.
2. Confirmation that the current planning proposal can progress independently of additional work being undertaken by the Department as outcomes of the draft Plan.

Other key points raised are:

- The draft Plan is based on the 2017 rezoning of Menangle Park URA and structure plan. The current planning proposal and supporting master plan demonstrates a more efficient use of land and infrastructure, creates a better and more resilient place, provides additional housing, caters for a wider range of housing types including missing middle, apartments and detached housing, facilitates better investment in infrastructure and facilitates additional employment opportunities as well as setting aside land for environmental conservation – consistent with the vision for Greater Macarthur. This should be reflected in the draft Plan or at the very least some flexibility included in the drafting of the Plan to contemplate an alternate structure plan or proposal.
- The draft Plan does not recognise the status of Menangle Park URA within other strategic documents such as the NSW Government's Greater Macarthur Land Release Investigation (2015) which recognises the potential for Menangle Park to provide additional housing, more jobs and a larger town centre.

- A number of studies and technical analysis have already been completed for part of the Menangle Park URA – which were undertaken in consultation with Council, government agencies and the local community. The draft Plan should be updated to reflect this work as it relates to next level precinct planning.
- The draft Plan should be updated to recognise the biodiversity strategy for Dahua’s land within the Menangle Park URA. This includes the establishment of Biodiversity Stewardship Sites (BSS) managed under a Biodiversity Stewardship Agreement (BSA) under the Biodiversity Conservation Act 2016, the purchase and retirement of ecosystem credits; and revegetation/rehabilitation works. Mapping within the draft Plan should be updated including aquatic biodiversity vegetation overlay. The biodiversity studies undertaken on the site should inform the development of the Cumberland Plain Conservation Plan.
- The draft Plan identifies a merit consideration approach for active post-exhibition rezoning proposals. It is not clear what the process is for planning proposals which were in preparation and submitted to Council long before the draft Plan was released. The current proposal and future redevelopment opportunities for the site cannot be delayed as a result of the need to undertake detailed studies in other parts of the Growth Area (i.e. preparation of green plans, bushfire evacuation plans etc). The planning proposal and redevelopment (Development Applications (DAs)) of the site must be able to be progressed whilst additional work in other parts of the Growth Area are being undertaken by the Department and / or other landowners.
- The draft Plan should highlight the longer-term aspirations of the site within the Menangle Park URA, and its status other than simply a ‘land release precinct’. The site has been rezoned for urban purposes since November 2017, it is the subject of a current planning proposal and a number of DAs and supporting studies seeking subdivision and works lodged with Council in 2017 but are still under assessment.



2

Introduction

2. Introduction

This submission has been prepared by APP on behalf of Dahua in response to the public exhibition of the draft Plan. Dahua are a major stakeholder within the Menangle Park URA. The Menangle Park URA forms part of the Greater Macarthur Growth Area (the Growth Area) and Structure Plan (land release areas) (refer to Figure 1). Of the 958 ha release area, approximately 498 ha of land is owned or under the control of Dahua (refer to Figure 2).

Dahua welcomes and commends the Department of Planning and Environment (the Department) in releasing the draft Plan, which sets a long term vision for the Growth Area as it develops and changes. It is also accompanied by a strategy to provide for the necessary State and local infrastructure (i.e. transport, schools, open space, community facilities) required to support growth. The draft Plan will inform more detailed 'precinct planning' for the Growth Area and as such it is important that the draft Plan is based on the most current available information, is forward looking and provides some flexibility to respond to changing market dynamics, demographics, different types of living and working. As stated on page 2 of the draft Plan, the document is to be reviewed as information becomes available.

The draft Plan in so far as it relates to Menangle Park is based on the 2017 rezoning of Menangle Park URA and supporting structure plan. Whilst the rezoning was completed in 2017, the planning process commenced in 2003, had a long history and was subject to a number of iterations. In November 2018, Dahua submitted a formal planning proposal to Campbelltown City Council (Council) relating to 507 ha of land within the Menangle Park URA. This included all land owned or under the control of Dahua and six (6) additional properties on the eastern side of Cummins Road owned or under the control of other landowners (refer to Figure 3). It followed the submission of a preliminary proposal to Council in May 2018 and more than 12 months of discussions with Council and the Department. The planning proposal is accompanied by detailed planning, urban design and technical reporting including traffic and transport, biodiversity and open space and social planning assessments. A revised master plan was prepared to demonstrate the capability of the site to accommodate the new vision for the release area and to guide future planning. A copy of the revised master plan is included in Figure 4 and **Appendix A**.

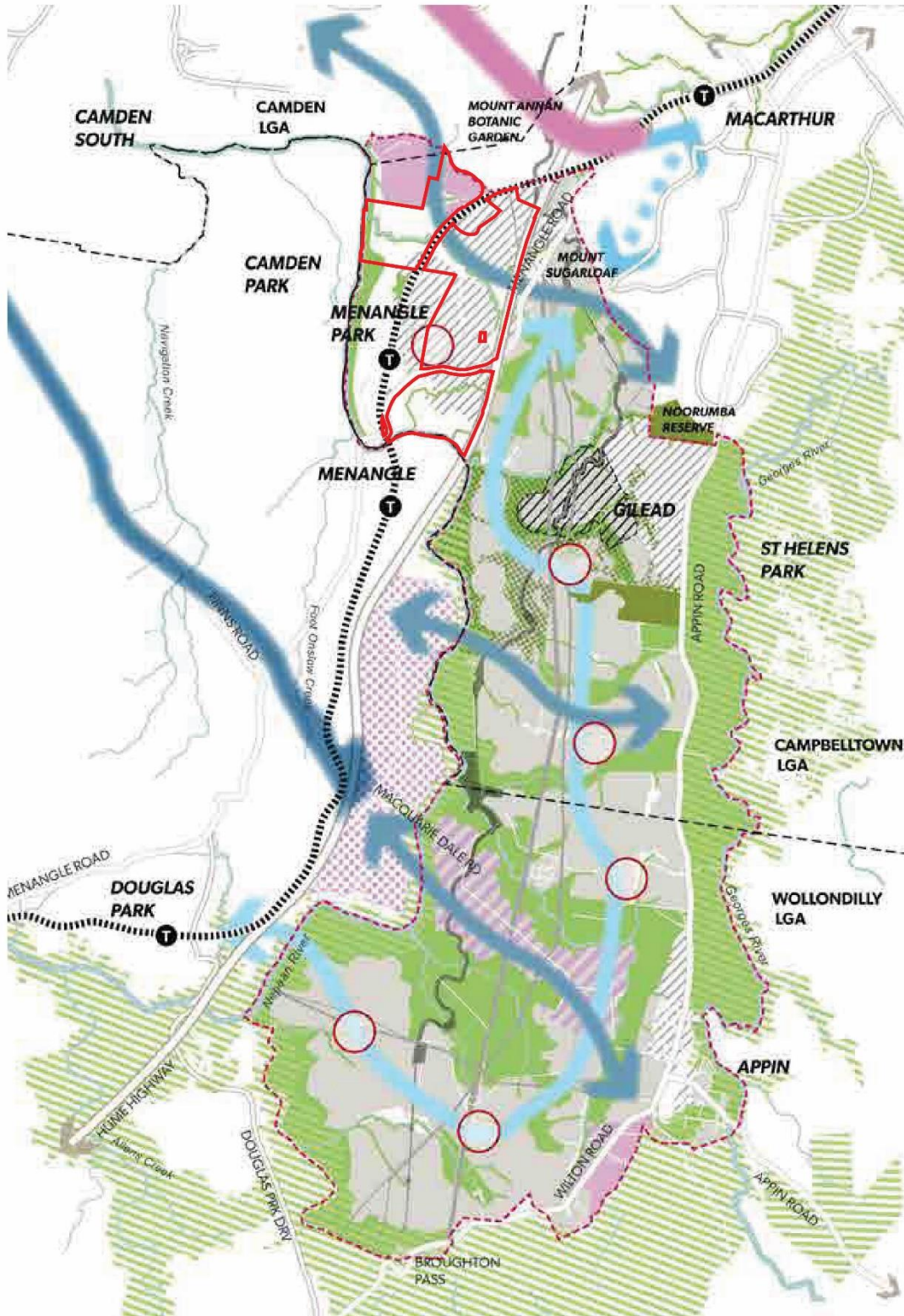


Figure 1 – The site in relation to the Greater Macarthur Structure Plan

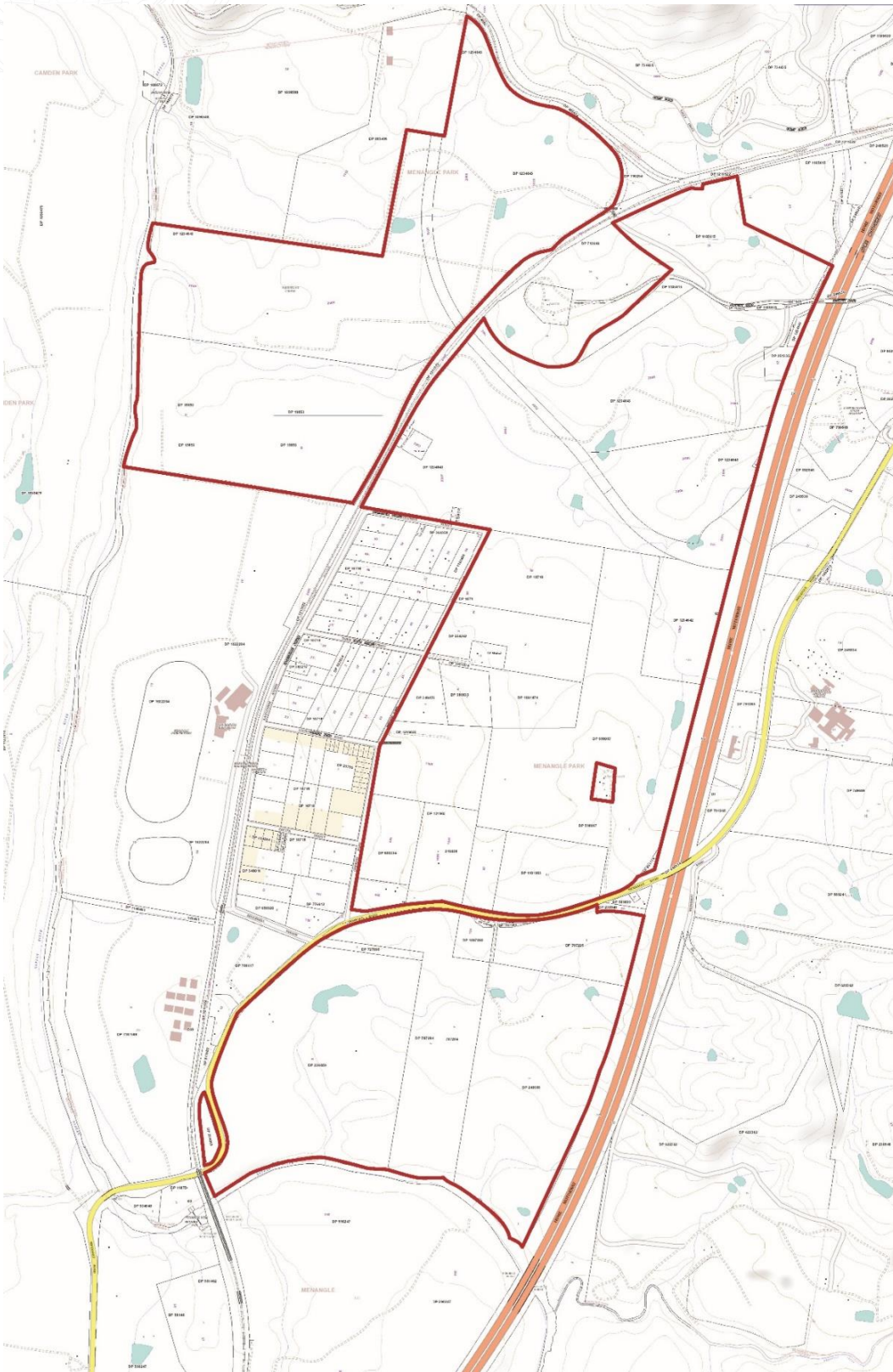


Figure 2 – Land owned or under the control of Dahua

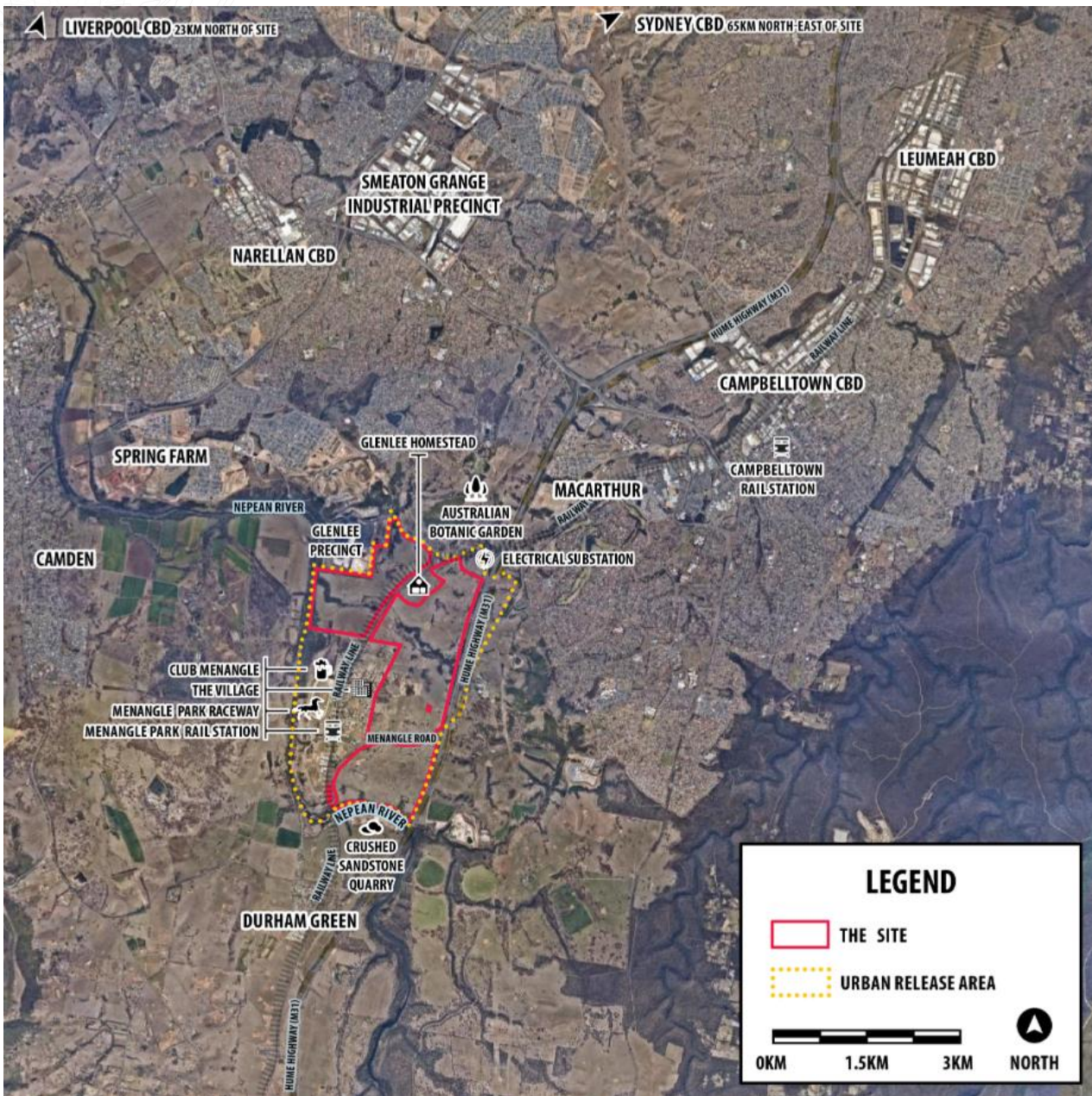


Figure 3 – The Site (land to which the planning proposal relates)

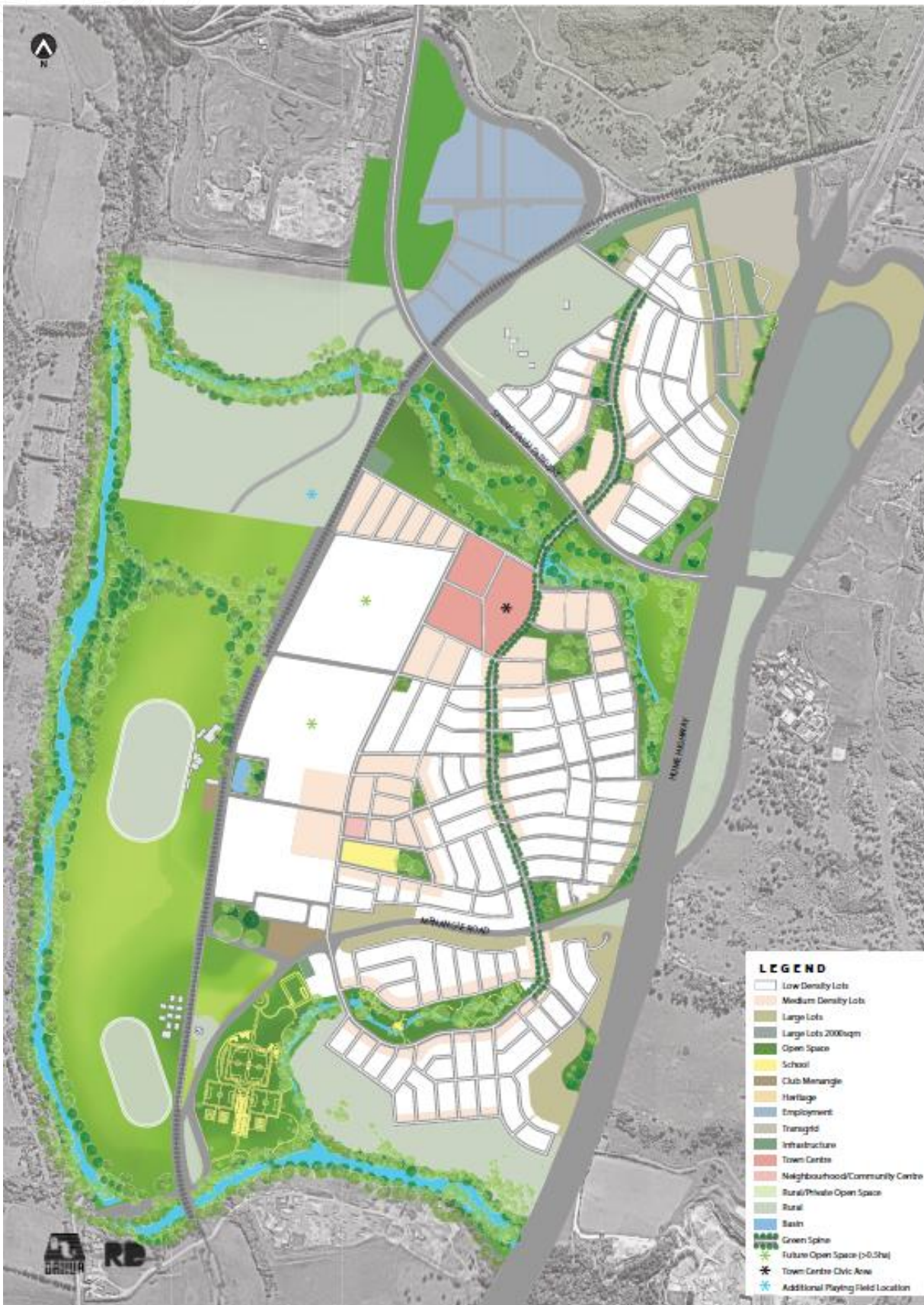
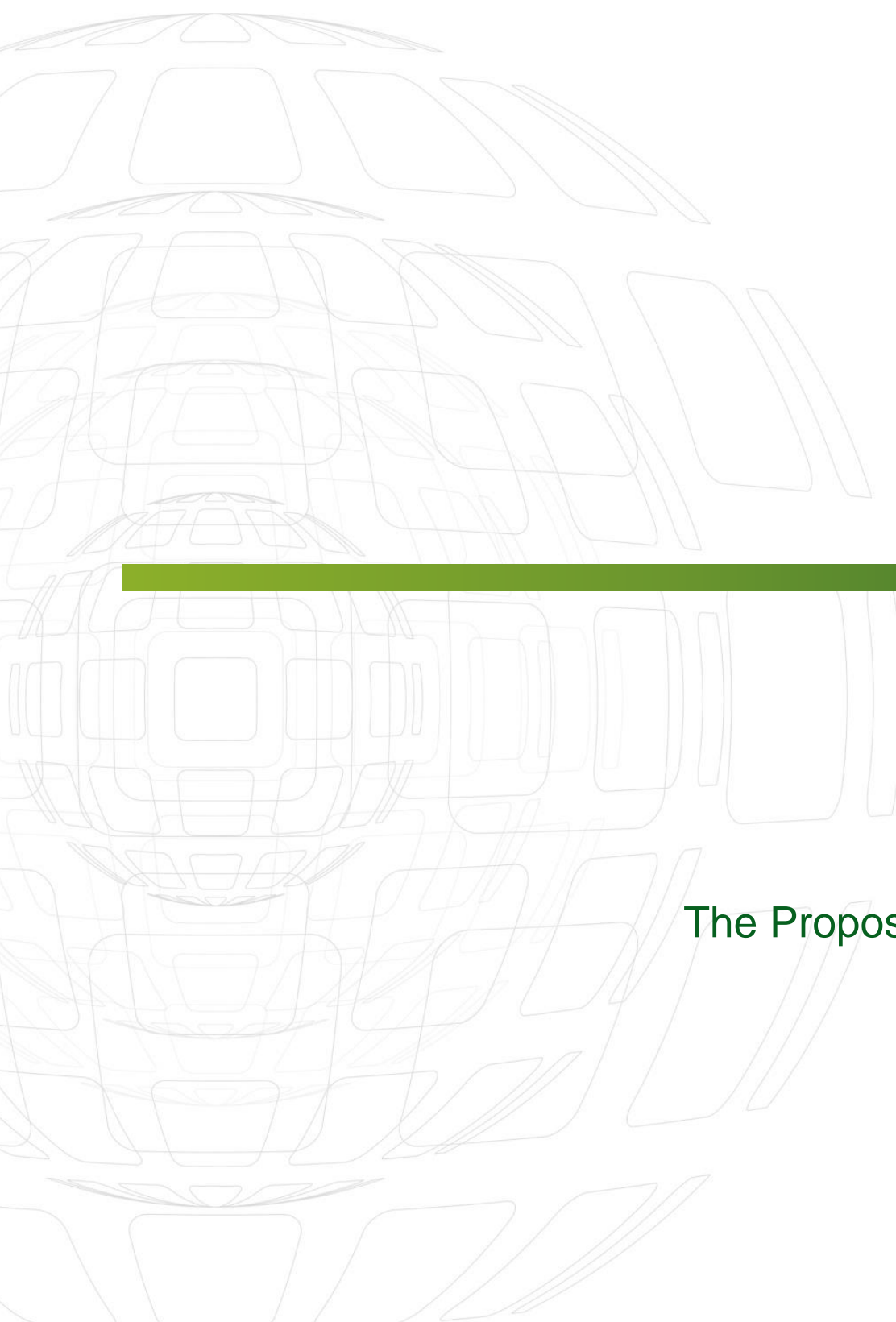


Figure 4 – The Revised Master Plan

The key issues raised are summarised below.

- Parts of the draft Plan as it relates to the Menangle Park URA are already superseded by the detailed work undertaken to support the current planning proposal. It is recommended that the draft Plan be updated to reflect the detailed planning, urban design and technical reporting that has occurred over the last 12-14 months, consistent with the statement on page 2 of the draft Plan which states that the Department would update the draft Plan when information becomes available. This will ensure that not only the draft Plan is as up to date and as current as far as it can be but that future proposals, planning applications on the site, which are subject to a current planning proposal, are consistent with it and any other future detailed planning document which has been informed by the draft Plan.
- The draft Plan should be updated to recognise the biodiversity strategy for Dahua's land within the Menangle Park URA. This includes the establishment of Biodiversity Stewardship Sites (BSS) managed under a Biodiversity Stewardship Agreement (BSA) under the Biodiversity Conservation Act 2016, the purchase and retirement of ecosystem credits; and revegetation/rehabilitation works. Mapping within the draft Plan should be updated including aquatic biodiversity vegetation overlay. The biodiversity studies undertaken on the site should inform the development of the Cumberland Plain Conservation Plan.
- The draft Plan is based on the 2017 rezoning of Menangle Park URA and structure plan. The current planning proposal and supporting master plan demonstrates a more efficient use of land and infrastructure, creates a better and more resilient place, provides additional housing, caters for a wider range of housing types including missing middle, apartments and detached housing, facilitates better investment in infrastructure and facilitates additional employment opportunities as well as setting side land for environmental conservation – consistent with the vision for Greater Macarthur. This should be reflected in the draft Plan.
- The draft Plan does not recognise the status of Menangle Park URA within other strategic documents such as the NSW Government's Greater Macarthur Land Release Investigation (2015) which recognises the potential for Menangle Park to provide additional housing, more jobs and a larger town centre.
- The draft Plan identifies a merit consideration approach for active post-exhibition planning proposals. It is not clear what the process is for planning proposals which were in preparation and submitted to Council long before the draft Plan was released. It would be unreasonable for the current proposal and future redevelopment opportunities for the site to be delayed as a result of the need to undertake detailed studies in other parts of the Growth Area (i.e. preparation of green plans, bushfire evacuation plans etc). The planning proposal and redevelopment of the site should be able to be progressed whilst additional work in other parts of the Growth Area are being undertaken by the Department and / or other landowners.
- The draft Plan should highlight the longer-term aspirations the Menangle Park URA, and its status other than simply a 'land release precinct'. The site is zoned for urban purposes, is the subject of a current planning proposal and a number of DAs and supporting studies seeking subdivision and works lodged with Council in 2017 are still under assessment.



3

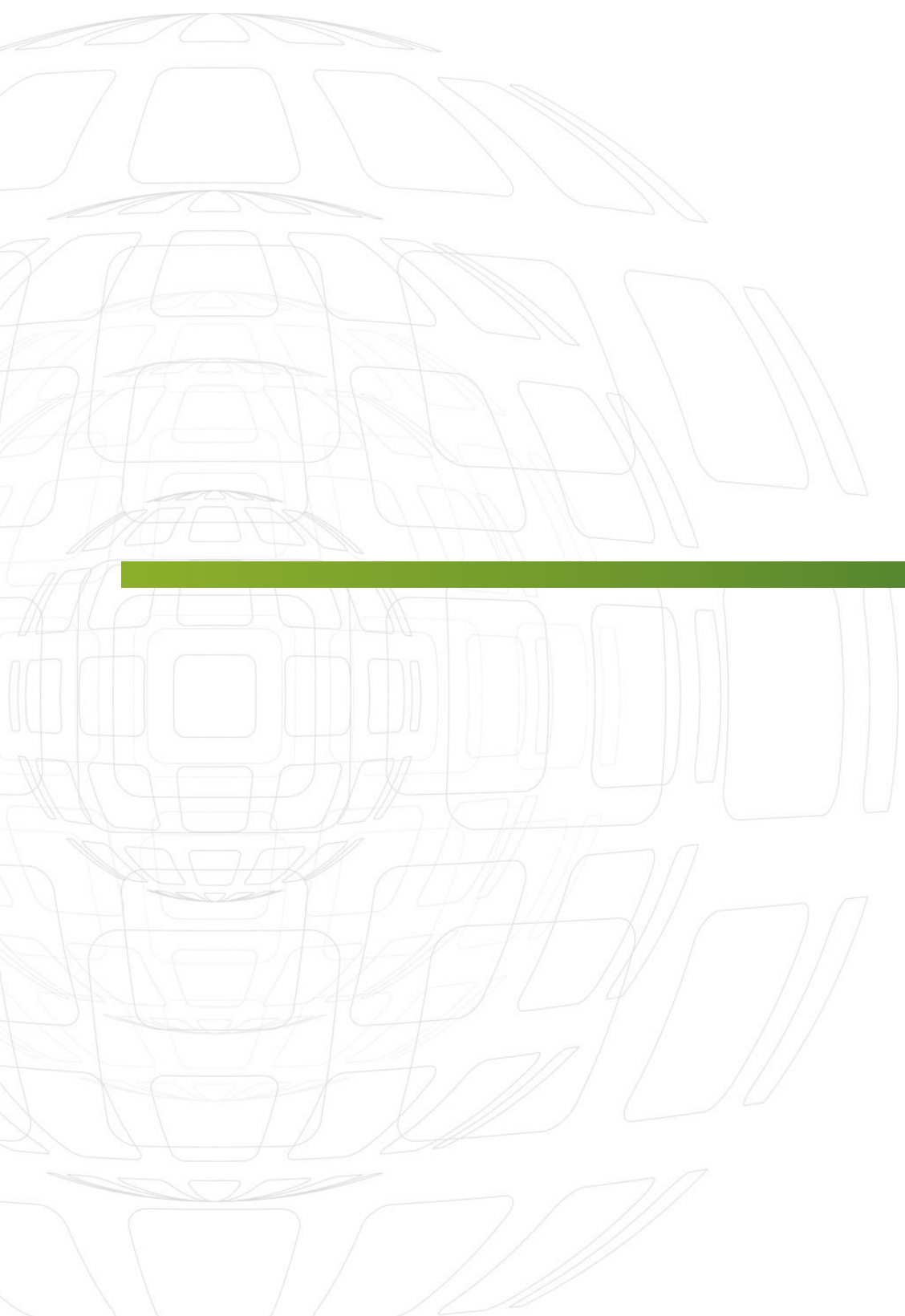
The Proposed Amendments

3. Recommended Amendments

The following recommended amendments are proposed:

1. The Structure Plan (Figure 2) on page 4 of the draft Plan should be updated to accurately depict the revised master plan for part of the Menangle Park URA (i.e. the town centre has been located further to the north, land fronting the Nepean river is identified as being urban capable to align with the planning proposal, transport connections etc).
2. Place (pages 18-19). The key goals identified for Menangle Park should be amended to acknowledge that the precinct was previously rezoned urban purposes and expanded to include the following:
 - Achieve higher density residential development around town centre, neighbourhood centre and areas of high amenity;
 - Deliver around 5,250 dwellings;
 - Provide a range of densities, lot sizes and dwelling types;
 - Create a green north-south link through the precinct;
 - Create a more connected precinct and town for people by increasing walkable and bicycle access to and within Menangle Park, particularly to the school, town centre, neighbourhood centre and residential areas;
 - Provide opportunities for additional and improved active and passive open space;
 - Valuing green spaces and landscape by increasing urban tree canopy, protecting waterways, setting aside additional land for environmental conservation; and
 - Creating a stronger economy.
3. Heritage (page 20). Figure 5 (page 22 of the draft Plan) does not depict heritage items within the Menangle Park URA accurately. This figure should be amended.
4. Landscape (page 31). The need to prepare a Green Plan for the site is not considered necessary. A significant quantum of work has been undertaken by Place Design Group to support the planning proposal. An exemption to the requirement to prepare a Green Plan should be granted.
5. Biodiversity. Figure 6 on page 36 of the draft Plan should be updated to reflect the biodiversity strategy for the site.
6. Flooding (page 43). The 1 in 100 Flood Mapping for the site as shown in Figure 4 (on page 44 of the draft Plan) is inaccurate. Suggest the planning principle relating to 'avoid any filling of flood plains, particularly those lands below the 1 in 100 chance per year flood' should be amended to acknowledge filling may be acceptable where it can be demonstrated that development would not cause any adverse impact to flood regime within and outside of a site. Clarification is also sought in relation to the definition of 'urban development', in particular whether this includes land for the purpose of open space. The draft Plan also identifies the PMF has been established in identifying urban capability. It is not clear what is meant by this statement, noting that the PMF does not always preclude development from occurring, being sometimes dependent on the nature of the flood, evacuation plans and evacuation risks.
7. Bushfire (page 45). A bushfire assessment for the site was prepared and submitted to Council as part of the planning proposal. Detailed bushfire assessment reports have accompanied a number of DAs lodged by Dahua and which are currently being assessed by Council. This work should be acknowledged by the Department.

8. Housing (page 50). The housing analysis undertaken on behalf of Dahua to support the planning proposal concluded that market trends that require smaller lot sizing for affordability and to accompany all lifestyle stages. The provision of 350-700m² lots as stated in the draft Plan does not support housing diversity and affordability. The draft Plan should be updated to allow for more flexibility to ensure that it can meet the market as it changes (keeping in mind that a lot of these land release precincts will be delivered in stages over a longer period).
9. Potential Homes (page 52). The potential number of new homes within the Menangle Park URA be amended from 4,000 to 5,250 dwellings or at the very least a range provided. Table 1 on page 52 and the text in the second column under the orange heading 'Menangle Park' should be updated.
10. Density (page 54). It is recommended that the draft Plan be updated to acknowledge the potential for different forms of housing and densities including higher density residential outside of local centres. High level criteria for the location of low, medium and higher densities could be incorporated into the draft Plan.
11. Figure 9 (page 55) of the draft Plan should be amended to reflect the new location of the town centre within the Menangle Park URA – which in the revised master plan (and planning proposal) has been relocated closer to Spring Farm Parkway and adjacent to open space and the existing natural creek corridor. This figure should also be updated to show the new north-south road and active transport link.
12. Resource Extraction. Figure 10 on page 64 of the draft Plan shows Coal Seam Gas Well locations in the Menangle Park URA. AGL has confirmed that these gas wells are anticipated to cease production in 2022 and following this will be scheduled for rehabilitation. This should be noted within the draft Plan.
13. Implementing the draft Plan. The draft Plan indicates a merit consideration of active post-exhibition planning proposals. In relation to planning proposals that were submitted prior to the release of the draft plan, the draft Plan is silent. An assurance from the Department that the current planning proposal will not be delayed whilst additional work to support more detailed precinct planning within the Growth Area is requested or details in relation to transitional arrangements.



4

The Issues

4. The Issues

For the purpose of this submission, the matters which Dahua wishes to bring to the Department's attention have been organised to respond to chapters within the draft Plan.

4.1. Place (pages 18-19)

The key goals identified for Menangle Park include: rezone and release land for urban development, deliver around 4,000 new dwellings, create a town centre providing local retail and commercial services. These should be amended to acknowledge that the precinct was previously zoned urban purposes. The following goals should be added:

- Achieve higher density residential development around town centre, neighbourhood centre and areas of high amenity;
- Deliver around 5,250 dwellings;
- Provide a range of densities, lot sizes and dwelling types;
- Create a green north-south link through the precinct;
- Create a more connected precinct and town for people by increasing walkable and bicycle access to and within Menangle Park, particularly to the school, town centre, neighbourhood centre and residential areas;
- Provide opportunities for additional and improved active and passive open space;
- Valuing green spaces and landscape by increasing urban tree canopy, protecting waterways, setting aside additional land for environmental conservation; and
- Creating a stronger economy.

Heritage (page 20)

Figure 5 (page 22 of the draft Plan) does not depict heritage items within the Menangle Park URA accurately. This figure should be amended.

Landscape

Page 31 of the draft Plan suggests that future detailed precinct plans will be informed by the preparation of a Green Plan. These plans will establish benchmark targets for open space and a green infrastructure network within precincts. Significant work has been undertaken by Place Design Group for the site as part of the planning proposal. This work in conjunction with the requirements of the site specific Development Control Plan (DCP) (currently being prepared) set out the landscape and open space vision for the site and detail the quantum (ha) of informal / passive open space (local parks, district parks), formal / active open space requirements (multi-purpose sports hub, sporting fields) and natural / informal areas (riparian land, ecology, green spine) required to meet the needs of the incoming population. For the purposes of a Green Plan, it is considered that sufficient work has been (or is currently) undertaken to satisfy the preparation of a 'Green Plan' for the site. Any additional open space requirements can be set out in the site specific DCP. Dahua has no issue with working with the Department in finalising the DCP. It is requested that the Department should acknowledge this work has been undertaken. The need to prepare a Green Plan for the site is therefore not considered necessary.

Biodiversity (page 31)

As stated on page 31, the Department is currently undertaking strategic conservation planning for the Growth Area. A Cumberland Plain Conservation Plan is to be prepared which will identify conservation measures to protect a range of threatened flora and fauna species and ecological communities. The conservation plan will inform urban development footprints in future precinct plans. The urban development footprint for site has been defined. It is requested that the Department acknowledge the biodiversity studies that been undertaken as part of the planning proposal and to support detailed DAs currently being assessed by Council. This work should be used to inform the conservation plan as it relates to the site.

As described in the planning proposal and supporting biodiversity work, a number of compensatory measures have been proposed to offset the residual impacts of DAs previously lodged by Dahua on the site. The current strategy for compensatory measures proposed for Dahua-owned areas of the Menangle Park URA include:

- Establishment of Biodiversity Stewardship Sites (BSS) managed under a Biodiversity Stewardship Agreement (BSA) under the BC Act;
- Purchase and retirement of ecosystem credits; and
- Revegetation/rehabilitation works.

These Biodiversity stewardship sites will result in the generation of ecosystem credits that can then be retired. Biodiversity stewardship sites will be contained within the riparian areas within the centre and northwest corner of the Menangle Park URA. These areas of retained habitat include some of the largest and best condition vegetation, which also provides connectivity to offsite habitat. A copy of the biodiversity work undertaken to date will be provided to the Department under a separate cover. Figure 6 on page 36 of the draft Plan should be updated to reflect the biodiversity strategy for the site. Given the quantity of ecological work undertaken, it is requested that the Department acknowledge that the current planning proposal can still progress and be finalised before the strategic planning conservation planning for the Growth Area is finished.

Figure 6 also identifies the site is subject to an aquatic biodiversity overlay. It is not clear where this overlay has been derived. Clarification from the Department is requested.

Open Space (page 38)

A detailed assessment of the demand for additional open space and other infrastructure was undertaken by Elton Consulting as part of the planning proposal. The revised master plan also provides better pedestrian and bicycle connections within and outside of Menangle Park. The work undertaken provides a connected network of open space, includes sport and recreation facilities, provides an improved cycleway and pedestrian routes and shared ways, consistent with the planning principles set out on page 40 of the draft Plan.

Flooding (page 43)

The 1 in 100 Flood Mapping for the site as shown in Figure 4 (on page 44 of the draft Plan) is inaccurate. This figure should be amended (information to be provided to the Department under a separate cover). It is noted that the planning principle relating to 'avoid any filling of flood plains, particularly those lands below the 1 in 100 chance per year flood' should not be read as a limitation, particularly where it can be demonstrated that development would not cause any adverse impact to flood regime within and outside of a site. It is recommended that this planning principle

be updated. Clarification is also sought in relation to the definition of 'urban development', in particular whether this includes land for the purpose of open space. The revised master plan which forms part of the planning proposal includes open space below this flood level. The draft Plan also identifies the PMF has been established in identifying urban capability. It is not clear what is meant by this statement, noting that the PMF does not always preclude development from occurring, being sometimes dependent on the nature of the flood, evacuation plans and evacuation risks.

Bushfire (page 45)

It is understood that the Department has prepared a strategic bushfire assessment for the Growth Area and that a transport infrastructure and evacuation study be undertaken to confirm the accessibility of a site prior to rezoning land in the event of a bushfire event. Detailed bushfire assessment reports will accompany future DAs and the site specific DCP will address bushfire hazard. The current planning proposal should be allowed to progress and be finalised prior to the preparation of this precinct wide study.

4.2. Built Form

Dahua is supportive of the built form objectives and planning principles (i.e. planning for diverse typologies, place-based approach, designing for people). The current planning proposal is consistent with these objectives and principles.

4.3. Land Use

Housing (page 50)

The draft Plan states that medium density housing (i.e. greater than 25 dwellings per ha) including smaller lots, terraces, medium density and multi-storey development would be located where feasible along highly accessible transport corridors connecting Campbelltown-Macarthur, Gilead, Appin and Douglas Park. The draft Plan goes on to say that for neighbourhoods further from transport corridors should have lower densities as shown on the Structure Plan. Detached housing on small to medium sized lots (350-700m²) is expected to make up majority of the product to meet the demand not supplied in the Growth Area. Table 2 on page 54 of the draft Plan provides density bands for R1/R2 zones between min 15 dwellings per ha to maximum 25 dwellings per ha and for R3 zoned land a minimum 25 dwellings per ha to maximum 45 dwellings per ha. Figure 9 shows the location of local centres within the Growth Area and a 400 m 'medium density residential area' surrounding the local centre.

The current planning proposal establishes minimum lot sizes of 300m² in the R2 Low Density Residential, R3 Medium Density Residential and R4 High Density Residential land use zones and 750 m² and 2,000 m² on land within the R5 Large Lot zone. To facilitate and encourage the provision of a range of dwelling types within the site it is then proposed to establish minimum lot sizes for certain types of residential development. The proposed lot sizes and densities, which in some locations are greater than 25 dwellings per ha, allow sufficient flexibility to respond to changes in the market and housing needs over a 10+ year period and address design issues should they arise during the detailed design.

The higher density housing types (residential flat buildings, shop top housing and small lot multi-unit housing) will be concentrated in and around the town centre, neighbourhood centre and in areas of high visual and landscape amenity. This will maximise access to services and help strengthen the customer base for local businesses and allow

more increased active travel and reduce the need for people to get into their cars to access local facilities and services. While the medium and lower density housing types will be located on the fringes and more topographical sensitive areas of the site. The proposed lot sizes and densities envisaged within the site are as a consequence of a market assessment undertaken by Colleen Coyne Property Research (a copy of which formed part of the planning proposal).

The housing analysis for Menangle Park demonstrates market trends that require smaller lot sizing for affordability and to accompany all lifestyle stages. The provision of 350-700m² lots does not support housing diversity and affordability – key objectives of the Western City District and Greater Sydney Regional Plan. The draft Plan should be updated to allow for more flexibility to ensure that it can meet the market as it changes (keeping in mind that a lot of these land release precincts will be delivered in stages over a longer period).

The draft Plan suggests that anticipated change will create demand for more compact housing that is better connected to transport and amenities. This is already happening. New housing will be required to respond to an ageing population and smaller household sizes on continued pressure on affordability.

In relation to yield, the draft Plan states that the yield for the Growth Area has been determined based on initial assessment of suitable locations for higher, medium and low density development and that precinct planning will allow the yield and capacity to be refined. For the Menangle Park URA, 4,000 potential new homes have been identified. The planning proposal and revised master plan is based on a maximum yield of 5,250 dwellings, of which 1,850 are to be accommodated on land owned and / or under the control of Dahua. The community and servicing infrastructure identified in the current planning proposal has been based on 5,250 dwellings. New and / or expanded infrastructure to support the revised master plan and additional incoming population, as well as recommendations on how to address the increased demand for services and facilities has been documented within the planning proposal. Dahua has demonstrated that the Menangle Park URA is capable of accommodating both additional dwellings and jobs from an environmental (i.e. traffic and active transport, biodiversity, local infrastructure etc), economic and social impact perspective. On this basis, it is requested that the potential number of new homes within the release area be amended to refer to 5,250 dwellings or at the very least a range, say between 4,000 – 5,300 dwellings. Table 1 on page 52 and the text in the second column under the orange heading 'Menangle Park' should be updated.

Density (page 54)

Dahua supports the statement on page 54 of the draft Plan which states that precinct plans should locate medium density in areas close to services, shops and transport corridors, as stated on page 54 of the draft Plan. Dahua also supports locating higher density residential uses in areas with high levels of amenity (i.e. adjacent to open space, school, neighbourhood centre, views). Dahua also firmly believe that with careful planning and good design, increased density can bring vibrancy and better amenity to communities, while also being sensitive to their character and heritage. High density residential development can achieve quality landscaping and gardens, resulting in attractive streetscapes where people choose to live. It is recommended this section of the draft Plan be updated to acknowledge the potential for different forms of housing and densities including higher density residential outside of local centres. High level criteria for the location of low, medium and higher densities could be incorporated into the draft Plan.

Table 2 on page 54 of the draft Plan identifies density bands for certain land use zones within the Growth Area (i.e. R1/R2 zones for 15-25dw/ha and R3 zones 25-45dw/ha). A density band for R4 High Density zoned land should also be prescribed. Dahua raise no issue with the proposed minimum and maximum dwellings per ha ranges for each zone category.

Figure 9 (page 55) of the draft Plan should be amended to reflect the new location of the town centre within the Menangle Park URA – which in the revised master plan (and planning proposal) has been relocated closer to Spring Farm Parkway and adjacent to open space and the existing natural creek corridor. This figure should also be updated to show the new north-south road and active transport link. The relocated town centre also better supports the local economy in that it will have good access from Spring Farm Parkway delivering economic activity. Its relocation will also be supported by the new employment areas at Glenlee.

Resource Extraction

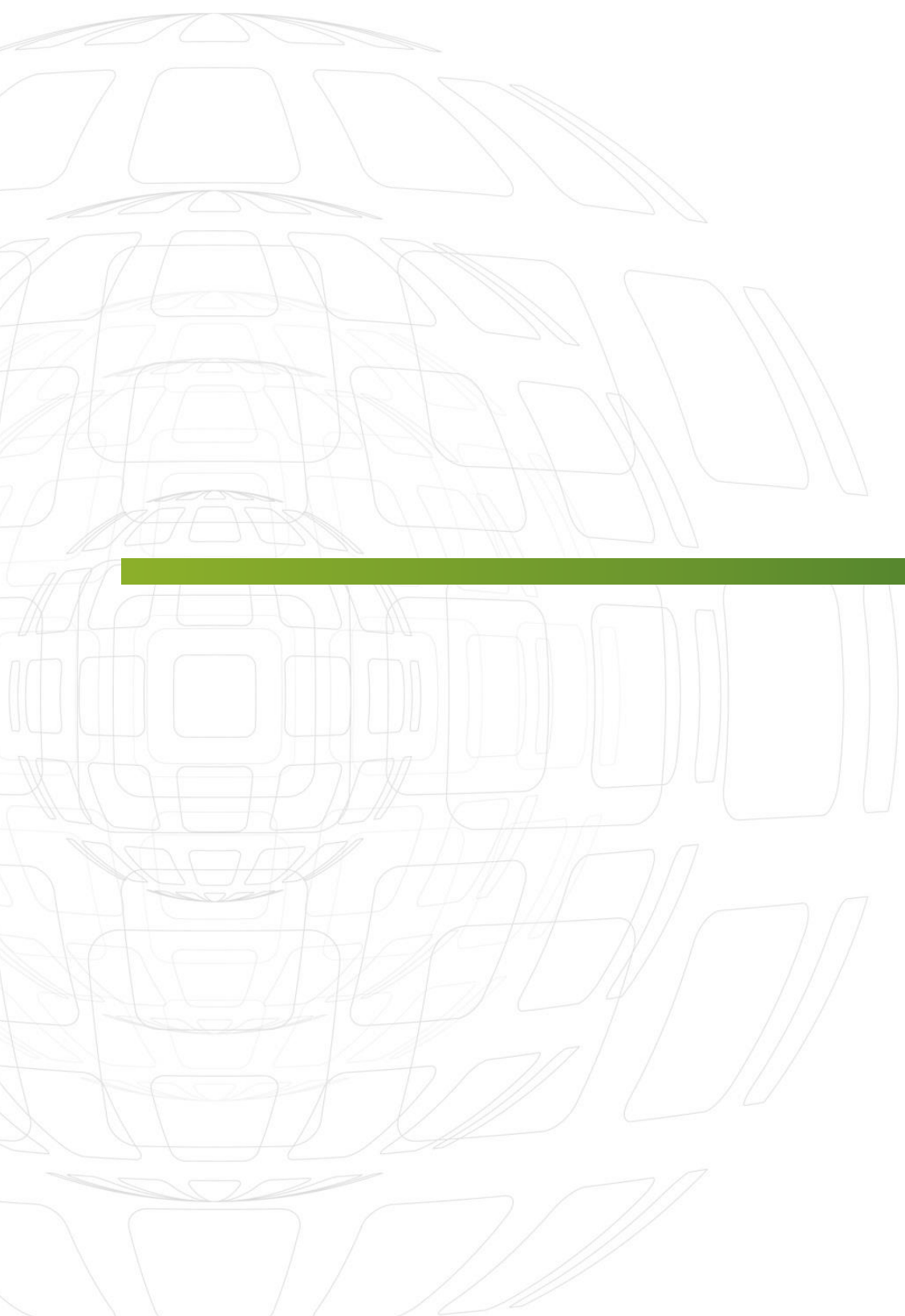
Figure 10 on page 64 of the draft Plan show Coal Seam Gas Well locations in the Menangle Park URA. These wells are in the open space / riparian area adjacent to Howes Creek, in the eastern portion of the site. AGL has confirmed that these gas wells are anticipated to cease production in 2022 and following this will be scheduled for rehabilitation. This should be noted within the draft Plan (and Figure 10).

4.4. Movement (page 70)

Dahua is already working in consultation with TfNSW in proposing bus routes throughout Menangle Park URA that fit with the revised master plan and proposed densities. 'Future Transport 2056' and electrification to increase service frequencies of train line to support the Greater Macarthur and Wilton Growth Area – however there is no recognition of its electrification in relation to Menangle Park and future density.

4.5. Implementing the draft Plan

The draft Plan indicates a merit consideration of active post-exhibition rezoning proposals. In relation to planning proposals that were submitted prior to the release of the draft plan, the draft Plan is silent. An assurance from the Department that the current planning proposal will not be delayed whilst additional work to support more detailed precinct planning within the Growth Area is strongly requested.



5

Conclusion

5. Conclusion

The successful development of the site and broader Menangle Park URA will assist the NSW Government in planning for more than 725,000 new homes to meet the 1.7 million additional people that will be living in Greater Sydney by 2056. It will provide a range of housing choices to cater for different life stages and different needs of families, a key element that is deficient in the current structure plan for Menangle Park.

Dahua welcomes and commends the Department in releasing the draft Plan, which sets a long term vision for the Growth Area as it develops and changes. However, there are a number of issues with the draft Plan which Dahua wishes to bring to the Department's attention and which are described in detail within this submission. These issues relate to the following:

- Updating the draft Plan to reflect the findings of technical studies (transport, bushfire, biodiversity strategy, open space and social infrastructure) undertaken to support the planning proposal as they relate to both the site (the subject of the planning proposal) and the broader Menangle Park URA.
- Confirmation that the current planning proposal can progress independently of additional work being undertaken by the Department as outcomes of the draft Plan.
- Updating the draft Plan to better recognise the ability of the Menangle Park URA to provide additional housing, more jobs and a larger town centre.
- Amending the draft Plan should be updated to recognise the biodiversity strategy for Dahua's land within the Menangle Park URA.
- Amending the draft Plan to include a process is for planning proposals which were in preparation and submitted to Council long before the draft Plan was released.
- Amending the draft Plan to highlight the longer-term aspirations of the site within the Menangle Park URA, and its status other than simply a 'land release precinct'. The site has been rezoned for urban purposes since November 2017, it is the subject of a current planning proposal and a number of DAs and supporting studies seeking subdivision and works lodged with Council in 2017 but still under assessment.

We trust the Department will consider the matters raised within this submission. Dahua welcomes the opportunity to work with the Department to finalise the draft Plan.