

Submission by Wollondilly Shire Council

Greater Macarthur 2040: An interim plan for Greater Macarthur Growth Area

**As exhibited by NSW Department of Planning & Environment (November 2018 –
February 2019)**

February 2019

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1 INTRODUCTION

In December 2014, NSW Department of Planning & Environment (the Department) released *A Plan for Growing Sydney*, which nominated the Greater Macarthur region for urban release investigation.

In September 2015, the Department released the *Greater Macarthur Land Release Investigation – Preliminary Strategy and Action Plan*. Two precincts within the investigation are (i.e. Wilton Junction and Mt Gilead/Menangle Park) were identified for future urban release. West Appin was identified for potential urban release beyond 2036.

The Preliminary Strategy and proposed amendments to the *State Environmental Planning Policy (Sydney Growth Centres) 2006* (Growth Centres SEPP) were placed on exhibition in late 2015. Council considered a report on the exhibition at the November 2015 Ordinary Meeting, and subsequently made a submission to the Department.

On 29 July 2016, the (*then*) Minister for Planning, made the following announcement:

- The Growth Centres SEPP has been amended to include Wilton New Town as a Priority Growth Area
- The Mt Gilead/Menangle Park precinct has been expanded to include West Appin and the Glenfield to Macarthur Corridor for re-exhibition purposes.

The Department then placed the revised precinct and draft further amendments to the Growth Centres SEPP on public exhibition in August 2016. Council considered a report on the exhibited material at the August 2016 Ordinary Meeting, and made a further formal submission to the Department.

On 19 November 2018, the NSW Government released the *Greater Macarthur 2040: An interim plan for the Greater Macarthur Growth Area* (GM2040). The plan was placed on public exhibition until 8 February 2019.

Simultaneously, the State Government also released the *Greater Macarthur Special Infrastructure Contribution* (GMSIC). The GMSIC will enable the Department to collect contributions from developers to fund specific infrastructure items such as roads, public transport, schools, health facilities, biodiversity, and emergency services. A separate submission regarding the GMSIC has been prepared.

The Announcement includes a series of documents including:

- Greater Macarthur 2040: An interim plan for the Greater Macarthur Growth Area
- Frequently Asked Questions: Greater Macarthur 2040: An interim plan for the Greater Macarthur Growth Area
- Greater Macarthur 2040 interim plan community brochure

The following technical studies 'appear' to be exhibited with GM2040:

- Greater Macarthur Transport Infrastructure Study Part 1 (December 2017)

- Greater Macarthur Transport Infrastructure Study Part 2 (December 2017)
- Wilton Greater Macarthur Archaeological Research Design and Management Strategy Final (February 2017)
- Wilton and Greater Macarthur Biodiversity Study (June 2017)
- Wilton Greater Macarthur Priority Growth Area Future Employment Analysis (April 2017)
- Wilton Greater Macarthur Land Release Investigation Area Housing Demand Analysis (May 2016)
- Greater Macarthur and Wilton Retail Market Analysis (November 2016)
- Greater Macarthur and Wilton Social Infrastructure Assessment (July 2017)
- Wilton and Greater Macarthur Utilities Services Study (June 2018)
- Greater Macarthur Investigation Area – Aboriginal and Historic Heritage Gap Analysis and Future Direction

2 THIS SUBMISSION

Wollondilly Council is submitting a submission to cover:

- Greater Macarthur 2040: An Interim plan for Greater Macarthur Growth Area.

3 WOLLONDILLY SHIRE COUNCIL - POSITION ON WEST APPIN

On 10 December 2018, Council resolved a number of actions in relation to GM2040, including, *'in the strongest terms expressing our absolute objection to Greater Macarthur 2040'*.

The December 2018 resolution is consistent with Councils long standing position on growth of which support for Wilton was contingent on ***not supporting*** *"development at West Appin, and beyond 2036, the government could investigate growth options"*.

The following table provides a summary of some of the key dates and Council decisions made in relation to Growth at West Appin. The information relates to Greater Macarthur, Councils Growth Management Strategy and relevant planning proposals in Appin.

Time Period	History/ Events
February 2009	In response to Council commencing preparation of a Growth Management Strategy, Council resolves to defer the rezoning application until the findings and outcomes of the Growth Management Strategy have been finalised (item PE6 – Outstanding Rezoning Applications).
February 2011	Wollondilly Growth Management Strategy (GMS) 2011 adopted by Council. Rezoning applications on hold are now able to be considered
April 2011	Following Council's adoption of the GMS, Council resolves that the proponent, along with other applicants, be given the option to resubmit their rezoning applications under the new planning system or withdraw their applications and receive a refund of the initial fee paid (item PE5 Update on Rezoning Applications/planning proposals).
December 2014	The NSW Government release A Plan for Growing Sydney which identifies a potential new Growth Centre in South West Sydney.

Time Period	History/ Events
	Subsequently, the NSW Government Department of Planning & Environment commence investigations to assess the suitability of land in the Macarthur South region for future urban development.
March 2015	Council resolves that the final determination of planning proposals in the Macarthur South Investigation area be deferred until the Department has completed studies (item PE7 Draft Growth Management Strategy – Impact of “A Plan for Growing Sydney”).
June/July 2015	A series of independently facilitated workshops are held with the Appin community to discuss Growth In and Around Appin. The key issues with growth identified through the workshops were the environment, infrastructure, heritage & rural living, and communication & transparency.
August 2015	Council resolve that all planning proposals in the Greater Macarthur Investigation Area to remain on hold (item PE5 Greater Macarthur Investigation Area – Impact on current Planning Proposals).
September 2015	Council resolves that all Planning Proposals within the Greater Macarthur Investigation Area remain on hold pending formal notification of the initial outcomes of the Greater Macarthur Investigation area (item PE3 Update on Impact of “A Plan for Growing Sydney”).
September 2015	The NSW Government released the Greater Macarthur Land Release Investigation; Preliminary Strategy & Action Plan. The Action Plan indicates that the rural setting of Appin Village will be protected, with only small scale expansion taking place, in line with existing post-Gateway Planning Proposals. The Macquariedale Road Planning Proposal and the Appin Bulli Road Planning Proposal are the two post-Gateway planning proposals in Appin.
July, 2016	Draft SEPP Amendment placed on public exhibition to include land at West Appin as a priority growth area.
8 August 2016	In report PE1, Council resolved to not support development at West Appin, and beyond 2036, the government could investigate growth options.
17 October 2016	Council resolved in PE11 to reaffirm its position from 8 August.
February 2018	Community Forum held at Appin
December 2018	Council resolved a number of actions in relation to GM2040, including, ‘ <i>in the strongest terms expressing our absolute objection to Greater Macarthur 2040</i> ’

4 KEY PLANNING CONCERNS FOR GREATER MACARTHUR

Later in this submission, GM2040 is reviewed broadly section by section with comment. This section of this submission considers issues that have been identified in GM2040 and the associated material provided.

- Lack of Collaboration and Consultation
- Planning Pathways
- What is West Appin?
- Out of Sequence development
- Connectivity to Wilton and the Shire
- Electrified rail and public transport
- No Cost to Government equals a cost to Council and the Community
- No commitment to Jobs growth
- Essential servicing Infrastructure has not been adequately resolved

A short explanation of these concerns is provided below:

Lack of Collaboration and Consultation

GM2040 was released on the 19 November 2018, with the Department holding three drop in sessions for the community with only one session in Wollondilly Shire, held on 24 November 2018. It is very disappointing that only 5 days' notice was provided to the community for such an important future plan. Council attempted to spread the announcement via social media, radio and email. Council wrote to the Department on 29 November 2018 seeking a commitment that an additional drop in session be held in early February 2018 so that genuine and meaningful consultation with our residents can occur. Unfortunately at the time of this submission, no formal response had been provided by the Department.

It is noted that Council also wrote to thousands of residents in and around Greater Macarthur, and extending to adjoining areas that will undoubtedly experience change and impact through traffic, urban character, and other possible social impacts.

The announcement also highlights a 'collaborative planning' approach and states

"A coordinated approach across Councils and NSW Government agencies is fundamental to the success of the Greater Macarthur Growth Area. The Department of Planning and Environment will work closely with Campbelltown, Camden and Wollondilly councils to manage infrastructure delivery to create vibrant places, streets, open space, and public areas, and support a streamlined planning process.

GM2040 also makes a number of statements that the Department of Planning & Environment will continue to collaborate with ...Wollondilly to manage infrastructure, and the creation of place, streets, open space, and public areas through streamlines planning process.

Disappointingly, Council staff were invited to only one workshop during 2018 which was aimed that major landowners only. There has been very little collaboration to date, and this includes limited information or involvement on infrastructure planning and updated studies. There will now be limited opportunity for Council input in to the infrastructure process with the draft Special Infrastructure Contribution being notified as part of the exhibition process.

Planning Pathways

GM2040 nominates options for the different pathways available for the future rezoning of land. Page 10 includes text about the Planning Partnership Office (PPO) which will 'enable coordinated delivery of the rezoning of land that also integrates with the planning and delivery of infrastructure'. Page 77 also includes detail on the Planning pathways. Again, highlighting a role for the PPO.

Concern is raised that the document is unclear as to the PPO's role in a legislative and process context, and moreover, DPE essential role and responsibility in the scheduling, sequencing and delivery of infrastructure particularly in the securing commitment as part of the Greater Macarthur planning exercise.

One of the sensible planning outcomes in the plan is the need for 'neighbourhood plans' which is a tool that Wollondilly Council staff have been advocating for as part of the Wilton planning process. Neighbourhood planning, if supported in the right legislative framework, may deliver

a more robust outcome. Without it, the SEPP and the new 'urban development zone' are far too 'open' without any supporting controls, and do not provide sufficient assurance to Council and the community on development. In addition, should any future State Environmental Planning Policy (i.e. Code SEPP) apply, a neighbourhood plan may assist in securing a better built form outcome, with vegetation, form and structure and other urban design characteristics that are not typically delivered through the use of Codes.

While the introduction of Neighbourhood plans is welcomed, there is no detail on these plans and their legislative weight which leaves some uncertainty. Further information and work must be detailed so that Council can understand the benefits of these plans and how they can be used effectively.

Page 15 of GM2040 also notes that further studies will guide the next phase of precinct planning and will be conducted through the PPO. This cost should be borne by the State Government rather than putting further pressure on Councils and the PPO to fund these studies.

What is West Appin?

GM2040 contains a number of inconsistent references to West Appin, Appin and North Appin. The Plan does not define what West Appin is, and it is used interchangeably throughout the document.

Council has assumed that West Appin includes both Appin and North Appin. On page 19 there appears to be a contradiction where North Appin is a 'separate precinct' to West Appin. However the only other precinct noted is 'Appin'. I.e., not West Appin, except in Table 1 on page 52, where Appin appears to be called 'West Appin'.

As noted above, Council has made its position on growth in West Appin very clear. In this regard, it is noted that 'Appin' or 'West Appin' is set for growth in the longer term, but North Appin is not. This is inconsistent with Council's position on not supporting "development at West Appin, and beyond 2036, the government could investigate growth options. It is also noted that the *Utilities Services Study 2017 (AECOM)* states ". At this time West Appin is not forecast to be required before 2036". These associated studies do not appear to separate 'North Appin' from West Appin, thus adding to the confusion.

Out of Sequence development

With the exception of "North Appin", GM2040 talks about West Appin having the potential to deliver 15,000 homes in the longer term. However, as noted in the 'key actions' on Page 5, *'Landowners will have the opportunity to bring forward the release and rezoning of land so long as there is no financial impost on government'*. The Land Use section (page 50) also notes *'in the longer term, West Appin also has the potential to be rezoned for housing. While current forecasts suggest not all the Growth Area will be required before 2036, regular reviews of this plan will monitor take-up rates, demand and infrastructure servicing'*. The two statements remove any integrity and security of withholding development until after 2036 in West Appin.

While the plan provides the intention for longer term, there are a number of opportunities throughout the plan for West Appin to accelerate and be delivered far earlier. This is inconsistent with Council's previous clear requests, and is inconsistent with the previous commitments for supporting growth at Wilton New Town.

Connectivity to Wilton and the Shire

One of the major gaps in GM2040 is an absolute or strict precinct boundary planning approach taken for Greater Macarthur in terms of connectivity to the south of Appin. The plan (and the draft SIC) do not acknowledge Wilton, which will provide 15,000 houses. Wilton Road is major connecting road between Appin and Wilton, and includes a one way bridge crossing Broughton Pass, and is not suitable larger vehicles. The Hume Highway is the only other option for connectivity. Given the population growth stated by the State government may effectively double or triple the current Shire population, it is an absolute necessity that this connectivity is reviewed and funded by the State and or developers.

It is noted that the Transport Infrastructure Study 2017 (Jacobs study) identifies the following infrastructure required by 2051:

- Broughton Pass – New bridge over Broughton Pass
- Link Road C – New sub - arterial road connecting West Wilton and Picton Road

Neither of these appear to be funded by either Wilton or the Greater Macarthur SICs, meaning there will be significant connectivity concerns if development at West Appin proceeds earlier.

Indicative connections and corridors

Only one east west connection is wholly located within Wollondilly. The southernmost east-west connections links Appin area to the indicative M9 Outer Sydney Orbital. It is unclear to whether this connections will act as a thoroughfare between Bulli Appin Road and the M9 linking Wollongong to the Aerotropolis. The interchange point is identified as Douglas Park North. This would ultimately change the local character, built form, and increase development pressure in the areas. This is of particular concerns due to these localities being located outside of the identified Macarthur Growth area and within the Metropolitan Rural Area (as identified within the Greater Sydney Region Plan). An addition east-west corridor will terminate in Menangle, south of the existing village. Again this poses significant concerns on the implication of such an alignment. Further clarification is needed on the timing and alignment of such connections.

In addition the indicative transport corridor links to Douglas Park Train Station in the South West (and outside of the growth area). To be effective the rapid bus transit proposed within the indicative road corridor needs to align with increased servicing and the ultimate electrification of the Southern Highlands train line to service both Wilton and any proposed development within Greater Macarthur. Without the upgrade of the Southern Highlands Line connection through to Douglas Park is futile.

It is noted Figure 14: Future Transport (page 72) does not identify Menangle or Menangle Park Stations.

Implications for Menangle

In the same light as Douglas Park, Menangle is located outside of the Macarthur Growth Area, is identified as within the Metropolitan Rural Area and is likely to be significantly impacted by the proposed development outlined in GM2040. In addition, Menangle is subject to a number of heritage protections under the Wollondilly Local Environmental Plan 2011, including numerous heritage items, heritage conservation areas, and landscape conservation areas (expanding in all directions from the village centre). Any development within Menangle resultant from GM2040 would undermine the cultural and scenic values within Menangle.

Confirmation from the Department of Planning is required that the rural, cultural and scenic values of Menangle will be maintained and protected into the future.

Electrified rail and public transport

Future Transport 2056 identifies 'Greater Sydney Initiatives for Investigation (0 – 10 years)' Initiative 29 is 'Passenger train improvements to support growth at Wilton'. GM2040 changes or adds to the commitment, and states '*this program of infrastructure improvement includes, electrification to increase service frequencies to support the Greater Macarthur and Wilton Growth Areas*'.

It would seem logical that since the commitment in Future Transport 2056 was made on the basis of growth at Wilton only, then the inclusion of a further 18,000 homes in West Appin (and more in Greater Macarthur) would necessitate the immediate need to carry out a business case for electrified rail. GM2040 appears to leverage off of an existing commitment, which should be brought forward immediately.

No Cost to Government equals a cost to Council and the Community

The term '*No additional cost to government*' has been addressed in another report to Council, and subsequent submission, on the Draft Special Infrastructure Contribution. *That report notes 'that while this term is not defined, we take it to mean that infrastructure required as a result of growth is funded by development'*. The report also clearly notes the SIC is limited to secure land only, whereas capital expenditure, recurrent and ongoing costs and the like are not captured at all in the no cost to government model. This places extreme demand and pressure on Council and the Community, either contributing to or accumulating against existing shortfalls in infrastructure backlog, causes social disconnect or the community and Council can often wear the actual costs through alternative funding.

The contributions available to use for the 'no cost to government model' is limited funding available under the existing contributions scheme. If a developer is required to fund the capital expense to accelerate a precinct this portion of funding is quite often 'counted' against the total amount a developer is willing to pay. If the State requires additional funding, this is quite often 'deducted' from the amount available for Council to levy.

No commitment to Jobs growth

The Plan targets an additional 20,000 jobs within or accessible to the release areas. The release areas are different to the 'investigation areas'. It is unclear whether the same number of jobs are targeted for all land within Greater Macarthur. Given the job shortfall in Wilton, Council has continually advocated for the State Government to work towards achieving its target of delivering a job ratio of 1:1. Given the outstanding concerns with Wilton, the same concern is raised with Greater Macarthur which will only compound the issue of the self-containment and job accessibility issues for the Shire.

Essential servicing Infrastructure has not been adequately resolved

GM2040 notes 'Later stages of land release will require the construction of at least one new wastewater treatment plant. Depending on the rate, timing and location of development, and if Sydney Water is the service provider, it may provide one plant central to the land release precincts in the south of the Growth Area and the neighbouring Wilton Growth Area or two new plants in Menangle and Wilton.'

Council has serious concerns with the lack of detail and commitment to detail essential water and wastewater infrastructure upfront.

In Wilton, land has already been rezoned allowing over 7,000 lots, and a final solution to water servicing has not been identified, funded or agreed to.

On 10 December 2018, Council again resolved to maintain its withdrawal of 'in principle' support for Wilton New Town, and will reconsider its position once a number of important matters have been satisfactorily addressed. In part the resolution included:

"...a) The significant planning matters previously raised in the premature rezoning of Wilton South East;

b) Water and sewerage issues have been resolved to the satisfaction of Council, which includes an outcome where Council does not become a water authority, does not take on the ownership, management or maintenance of a lake for recycled water; c. Implications of the Greater Macarthur Priority Growth area and infrastructure requirements are integrated and connected and that this is fully funded;"

In this regard, Council has advised Sydney Water and the major landowners in Wilton that it is very concerned about the schemes being investigated. These matters must be resolved as part of the land use analysis and implementation and the solution must be a fully integrated water cycle management scheme.

Some of the options may make any development costs prohibitive or not feasible and must be explored and agreed to prior to rezoning of any land.

5 COMMENTS ON THE GM2040 INTERIM PLAN

In addition to the key concerns raised in this submission, the following section provides a short explanation on each 'section' of GM2040, and provides some further commentary specific to those sections.

Place

The structure plans for the Greater Macarthur Growth Area are divided into two plans:

1. Urban Renewal Corridor – this covers land from Glenfield to Macarthur along the existing rail corridor.
2. Land release areas – South of the Macarthur precinct including Menangle Park, Gilead, North Appin, and Appin.

GM2040 provides 12 growth precincts with each having a distinct character and development capability. The plan identifies five land release precincts as previously outlined. The precinct identified as Appin is located wholly within Wollondilly, with North Appin traversing two LGAs. The two precincts are predicted to deliver approximately 18,000 new dwellings within Wollondilly.

Appin (or West Appin) is described as having the potential to deliver higher density residential development around the future centres and the proposed transport corridor, delivering up to 15,000 new dwelling in the longer term.

Similarly, North Appin is described as being able to deliver higher density residential development around the future centres and along the proposed transport corridor. It is estimated that of the 5,000 new dwelling proposed in North Appin approximately 3,000 lots will be within Wollondilly, with the remaining 2,000 in Campbelltown. The North Appin precinct is to be separated from Gilead and West Appin through the creation of green corridors.

Comments from staff:

The Housing Demand Analysis completed by AEC Group (2016, p. 41) states that the:

[Greater Macarthur Land Release Investigation Area] is not an established market yet. As such, a controlled amount of land should be released over the next 10-15 years to build market acceptance before 18,000 lots in West Appin is considered for release.

The report also states that there is “no urgency for land at West Appin” (AEC 2016, p. 41). This is supported as the housing and population capacity at Wilton, Gilead, and Menangle have not been realised, nor is the supporting infrastructure available to support such a population increase.

However, this is not clearly reflected within GM2040. GM2040 does not provide a time frame for the delivery of housing within the North Appin precinct, but considers the land within the Appin precinct to be considered in the longer term. GM2040 also makes reference to ‘West Appin’ interchangeably with “Appin”. West Appin is used within some technical studies to identify land that appears to be the combination of Appin and North Appin as identified on the Precinct Map. This results in, inconsistencies and confusion in the ultimate staging of development, servicing, and the provision of infrastructure. Further clarification is required in regard to the precinct boundaries, with differentiation and consistency in reference to the various parts of Appin (i.e. Appin, North Appin, West Appin).

Landscape

The plan makes reference to a range of studies and programs being undertaken in this field, including but not limited to:

- Landscape character
- Western Sydney City Deal Liveability Program
- Green Plans
- Cumberland Plan Conservation Plan
- Protection of Koalas
- Flora and Fauna corridors
- Sustainable built form design
- Urban Green Cover in NSW Technical Guidelines (2015)
- Open Space, Green Gird and tree canopy
- Water
- Bushfire
- Waste
- Air Quality

Comments from staff:

The Environment team have provided extensive comments regarding the environmental components of GM2040, as well as the *Wilton and Greater Macarthur Priority Growth Areas Biodiversity Study 2017*. The team note that the landscape initiatives and mechanisms are interconnected and provide a range of social, economic, community and environmental benefits to place. In summary, GM2040 needs to have more regional scale and a cohesive approach between the Macarthur Growth Area and Wilton, with the following being the key points:

- *Koala protection* – the need to acquire/protect Koala habitat and designated corridors should be emphasised;
- *Sustainable development* – provisions are needed to ensure adequate space and appropriate siting of infrastructure to ensure the tree canopy target is achievable;
- *Open Space, Green Grid and Tree Canopy* – emphasis should be placed on the need to use local native plants where possible, with variation in vegetation strata;
- *Water* - there is an absence of reference to the risk based framework project involving the setting of local water quality objectives to identify the impacts of stormwater flow from the Wilton Priority Growth Area on the condition of waterways that is in the process of being finalised by the Environment Protection Authority and the Office of Environment and Heritage;
- *Risk Based Framework* - An Office of Environment and Heritage (OEH) representative has advised it is intended to directly apply the finalised Risk Based Framework for the Wilton Priority Area to the Greater Macarthur Priority Growth Area. GM2040 therefore needs to be amended to refer to this Framework and intended broad approach to achieve consistency by development within the Growth Area;
- *Air quality* – GM2040 needs to include;
 - Direct description of the current air quality within the Greater Macarthur Priority Growth Area and health implications during periods of elevated pollution levels (particularly ozone and Nitrous Oxides),
 - Likely levels of emitted pollutants arising from development (localised and cumulative) that would include vehicle emissions, and
 - Intended measures to reduce emissions and associated health impacts such as the incorporation and promotion of public transport, cycle ways and walk ways.
- *Waste* - A key concern is the inclusion of *Waste* within the landscape chapter. GM2040 highlights that by “2021 there will be deficit of 558,000 tonnes capacity for treatment of mixed waste and 128,000 tonnes for processing packaging waste”. This raises serious concern with the need to provide regional infrastructure and capacity to serve the expected population. The inclusion of waste within the *Land Use or Infrastructure Schedule* of GM2040 would be considered more appropriate. It is noted that a separate submission regarding waste is being prepared by the Campbelltown City Council who manage the regional domestic waste disposal contract on behalf of Wollondilly Shire Council, Camden Council, and Campbelltown City Council.

Built Form

GM2040 describes a place based approach to planning the various precincts. It notes a landscaped based approach for the land release areas with a mix of low and medium density housing, employment opportunities, social facilities and is reflective of the environmental and heritage values of the area.

Comments from staff:

The premise of the built form described for the land release areas may be supported in principle (in the future). Its success will be underpinned by the timely delivery of infrastructure including public transport, community amenities, and social facilities. Further to this, the completion and adoption of the relevant guiding documents such as (but not limited to) Precinct Plans, Neighbourhood Plans, Green Plans and Building Sustainability guidelines/framework.

It is noted that the objective includes land not located near a transport corridor would have a lower density; from 350 – 700m² (15-25 dwellings per hectare) or areas closer to the transport corridor would be 25-45 dwellings per hectare and in the form of medium density housing.

Land use

GM2040 addresses a number of land use factors including housing, local centres, economy, social infrastructure, health, education, resource extraction and agriculture.

GM2040 recognises that consultation with landowners will have to occur to better understand agricultural practices in the area as well as the intended land use and operations into the future. GM2040 notes that any relocation of agricultural activity will require identification of other suitable land beyond the growth area for continuing agricultural practices.

Comments from staff:

The proposed levels of Health and Education are not adequate to service the proposed population, nor does it recognise the current shortfall.

Approximately 50.3% of the Shire's current population aged 5-19 years are enrolled in education in Wollondilly. There are currently 5,219 school children in the Shire, of which 4,249 in high school served by 1 public high school and 1 private high school with a combined capacity of 1,577. The remaining Children travel outside of the Shire to 27 different high schools.

In addition, Wilton (a town the same size as Port Macquarie has no hospital planned, nor is there a clear integrated health care facility planned. Only 1 additional high school for 2,000 children is planned (which won't even cover the existing shortfall).

The lack of infrastructure needs is further detailed in the second report to Council regarding the Draft SIC.

In terms of the co-existence issues, exploration and resource extraction followed by urban development greater detail is required to address this issue. There is a clear concern over the approach taken with GM2040. The plan notes that some land is affected by an existing approval for coal mining over the next 15-30 years (land in Appin). Further, GM2040 details one of the Planning Principles is to 'avoid rezoning land where extraction is to occur within 15 years'.

The concern is that, if West Appin is noted considered for growth until after 2036, this timing will coincide with the possible mining operations, and therefore, the scheduling of this land is contrary to the Principle. The DPE should provide clear assurance of the timing for any mining operations, and assure Council that this will not impact the 'intent' for no development within West Appin prior to 2036.

Further to this *Figure 10: Current and planned mining* within GM2040 does not reflect all coal seam gas well within the Appin area, with numerous coal seam gas wells identified on Geosciences mapping.

The future ownership, maintenance requirements and any other encumbrances needs to be made very clear, and must be factored in to any infrastructure and funding considerations by the State.

Serious concerns are raised surrounding the protection of agricultural land within Wollondilly both in terms of land use and land use conflict. The relocation of agricultural practices will not be feasible for many landowners in terms of costs, new land use conflicts, permissibility and finding suitable land. The minimisation of land use conflict needs be addressed, and addressed without the assumption of agricultural industries ceasing. The appropriate buffers must be maintain through robust planning mechanism at a precinct, or regional scale. This is particularly important for land identified as Class 2 agricultural land.

In addition, the impacts on surrounding rural lands outside of Greater Macarthur may still be impacted by road upgrades and other impacts. These areas must also be considered.

Movement

The plan recognises Transport for NSW *Future Transport 2056* commitment to investigating with a 0-10 year time frame the electrification of the Southern Highlands Line south of Macarthur is increase service frequencies to support Greater Macarthur and Wilton growth area.

The plan also note that the NSW Government will investigate the prioritisation of road-based public transport services, and invest in higher frequency services.

Comments from staff:

The following comments are made in addition to those provided earlier in this report. The plan remains relatively silent on the provision of rail services past Macarthur Station. Public transport outlined in the plan is bus and road-centric. The Strategic Transport Infrastructure Study (Jacobs 2017) recommends the electrification of the existing rail line to Maldon by 2036, and the quadruplication and electrification of rail to Picton or Wilton to create a mass transit spine. The provision of timely rail upgrades, and appropriate service levels will be critical to the success of the Greater Macarthur growth area, particularly in the land release precinct. Further details on the timing and form the indicative transport corridor is needed.

Broughton Pass remains a significant constraint in connecting the Wilton Growth Area and Greater Macarthur. A “North-south arterial river crossing” is identified within the draft infrastructure list to be delivered in line with the development at Appin. The plan recognises collaboration between the State Government and Campbelltown City Council’s strategic road committee to coordinate investment. A more regional approach is needed to ensure connectivity within the region, and between growth centres. Further, as development occurs transport corridors need to be reserved to ensure development does not hinder future transport links. Thus greater detail on the alignment of transport corridors, and road connection (e.g. east west connections) is needed.

Implementing the Plan

GM2040 notes that a Section 9.1 Ministerial Direction will be issued to ensure any future land use change is consistent with the plan. It recognises that:

This will enable landowners to progress planning proposal on these sites in advance of the Department or Council-led investigations for each precinct

This is concerning for the proposed development in the Appin area. Out of sequence, or premature development would impact on the provision of infrastructure, particular those that relate to public transport such as the indicative transport corridor. In addition, should a landowner initiate a planning proposal prior to the Department finalising the applicable precinct plan, the full intent of GM2040 has the potential to be lost, potentially leading to fragmented development within the precinct.

Regarding the funding mechanism to facilitate delivery of the forecasted development the “at no cost to government” stance is noted. Given that individual rezoning application / planning proposal are likely to be assessed at the local level, the cost to Council is expected to be significant. Further to this, GM2040 emphasises that Council will fund the provision of local infrastructure through respective S7.11 Contributions plans. Again, out of sequence and/or premature development of the Appin precinct will place a significant burden on Council to provide the necessary infrastructure, as well as bare the ongoing costs of such assets.

6 WOLLONDILLY COMMUNITY STRATEGIC PLAN 2033

The Wollondilly Community Strategy Plan 2033 (CSP) represents the highest level of strategic planning undertaken by council.

The CSP identifies the main priorities and aspirations of the community, providing a clear set of strategies to achieve this vision for the future. The CSP is based upon the social justice principles of access, equity, participation and rights and addresses the quadruple bottom line (social, environmental, economic and civic leadership).

The CSP defines Wollondilly Shire’s Vision as:

Our Vision - Rural living

“Council’s vision reflects the Community’s desire to maintain Wollondilly Shire’s rural character together with the sense of belonging to caring communities that have been at its core for generations.”

To achieve our community’s vision for the future, six (6) key goals are identified to guide Council’s strategic direction. These are:

1. Rural setting and character

The rural setting is obvious with farmland and natural areas located between, separate towns and villages with residents experiencing and valuing this setting irrespective of where and how they live.

2. Viable agriculture

Agriculture and associated industries are encouraged and supported and continue to be a productive, sustainable and integral part of our economy, our Community and our landscape.

3. Community lifestyle

Our Community values its sense of community spirit, which is fostered through a strong identity with village life, a sense of belonging, and commitment to community participation and cooperation.

4. Diverse environment

The Shire's diverse environmental assets, including its waterways and catchments, riparian land, groundwater and dependent ecosystems natural areas, biodiversity and agricultural lands are valued and protected because of their environmental significance. Degraded natural resources are enhanced and maintained.

5. Heritage

The Shire's wealth of aboriginal and non-aboriginal heritage is valued and protected because of its cultural significance and its contribution to our sense of place.

6. Towns and villages

Development is carefully managed to maintain the separation of our towns and villages and their unique identities and strives to enhance their role as focal points which provide opportunities – housing, jobs, shopping, business, leisure, civic events, community facilities, education, and social interaction.

Wollondilly Shire Council's Community Strategic Plan 2033 should be front and centre for any consideration of GM2040. A full copy of the document can be found at:

www.wollondilly2033.com.au/assets/pdf/July_2013_New_CSP_2013_web.pdf

Council holds serious concern that the GM2040 Interim Plan is inconsistent with the Community Strategic Plan. There will be significant visual disruption and affect to the natural environmental and scenic assets within the Shire.

7 SUMMARY OF COMMUNITY CONCERNS

Community consultation was undertaken directly by the Department of Planning and Environment. GM2040 was released on the 19 November 2018, with the Department holding three drop in sessions for the community as follows:

- 24 November 2018 – Appin Public School, Appin.
- 28 November 2018 – Hurley Park Community Hall, Campbelltown.

- 5 December 2018 – Rosemeadow Community Hall, Rosemeadow.

Wollondilly Shire Council notified affected residents and landowners in December 2018 of GM2040 providing details on where to find additional information and make submissions. Further, a submissions inbox was set up to enable the Strategic Planning Team to collate the communities concerns, to better advocate on their behalf.

If the types of issues raised by the community differ to those within this report, it is proposed to provide a table to attach to the final submission which will identify the concerns.

Internal consultation has occurred with the relevant departments. The comments have been included in this report, and subsequently will aid in formulating Councils submission to the Department.

Recent Council consultation in Appin

As a result of significant community interest in a planning proposal for Macquariedale Road, Appin, Council engaged an independent facilitator to assist in running a special community session on 20 February 2018. 50 people were registered as attending the event.

StraightTalk recorded a number of views about the proposal, and summarised those views under the following key considerations:

- Zoning and lot sizes
- Traffic and traffic management
- Infrastructure
- Existing Water pressure concerns
- Environmental issues
- Cynicism about outcomes and delivery
- Streetscape

It is important to note these important planning concerns raised by the residents of Appin, as these are likely replicated with GM2040

Concerns collated via dedicated submissions inbox

The following table surmises the concerns raised by the community and forwarded through to Council:

Issued Raised
Land-use Conflict
<ul style="list-style-type: none"> - Proposed development may result in land-use conflict and hinder the continued use of land. - Serious concerns raised regarding the continued use of land by a community organisation.
Insufficient Detail
<ul style="list-style-type: none"> - Unable to ascertain sufficient detail to establish possible impact on the continuation of land use into the future
Views / loss of rural character
<ul style="list-style-type: none"> - development will destroy the rural environment of Wollondilly - Loss of rural and agriculture land - Loss of scenic rural areas - History of agriculture will be lost - Loss of lifestyle

Sequencing and timing of development
<ul style="list-style-type: none"> - Development should be fast tracked - Reasons needed as to why development is to occur in Appin prior to 2036 - Out of sequence development concerning - Certainty around the delivery of infrastructure needed particularly if segments are released out of order. - Need to overcome constraints before rezoning land
Number of dwellings / population growth
<ul style="list-style-type: none"> - No issue with 20,000 dwellings proposed - 18,000 additional houses in West Appin to double the current number of dwellings in the Wollondilly Shire - Prior precedents of Court approved increases to dwelling caps further extenuates the possible impacts on the surrounds
Employment generating land
<ul style="list-style-type: none"> - Supportive of employment generating land - Where will all the additional people work? - Jobs will inevitable be out of the area creating long commutes and increased traffic - Not enough jobs proposed for number of people - Not appropriate jobs proposed – heavily weighted in retail and unskilled jobs.
Climate change
<ul style="list-style-type: none"> - Negative impacts of future development on climate change - More emphasis required on mitigation measures against climate change - Cumulative impacts (lack of public transport, increase car use, lack of trees, increase roof areas, hard surfaces) - Heat island effect
Impact on agricultural land
<ul style="list-style-type: none"> - Farmland should be used for more intensive agriculture to feed Sydney's population - Impacts on food security of the region
Urban sprawl/lot sizes
<ul style="list-style-type: none"> - Waste of valuable land to sprawl - 400 square metre lots too small - 600 square metre lots needed as a minimum to maintain rural feel - Lot sizes will be significantly smaller than the current context - Lot sizes will only allow small or no backyards - Urban sprawl sterilising regionally significant coal resources
Flora and Fauna
<ul style="list-style-type: none"> - Macarthur has the last disease free colony of Koalas, need to be better protected - Destruction of natural habitat - Impact on Cumberland Plain Vegetation - Meaningful preservation and conservation outcomes needed for Koalas
Connections to and from Appin
<ul style="list-style-type: none"> - Plans don't mention the connection between Wilton and Greater Macarthur - Broughton Pass needs to be upgraded - Broughton Pass is currently a single lane bridge - Broughton already unreliable. Connection is easily cut due to truck accidents and was recently closed off for 12 months following the 2016 storm event. - Sub-arterial roads off the Hume Highway will destroy the rural character of the area. - Hume Highway / Picton Road intersection needs upgrading
Infrastructure – public transport
<ul style="list-style-type: none"> - Need better public transport - A greater proportion of money needs to be designated to the provision of public transport - Current public transport is already lacking - No commitment to providing rail - Traffic, freight and public transport planning needs to be coordinated. - No mention of trigger points for the delivery of such infrastructure
Infrastructure - schools
<ul style="list-style-type: none"> - Allocation of land only, need details on the provision of new buildings, staffing etc - Primary school already at capacity - No commitment for a high school

Infrastructure – hospitals
<ul style="list-style-type: none"> - Allocation of land only, need details on the provision of new buildings, staffing etc - No mention of trigger points for the delivery of such infrastructure
Infrastructure – emergency services
<ul style="list-style-type: none"> - Allocation of land only, need details on the provision of new buildings, staffing etc - Response times to Appin already concerning - No mention of trigger points for the delivery of such infrastructure
Community engagement
<ul style="list-style-type: none"> - Only five days' notice given for community drop in session in Appin - Only one session held in Wollondilly - Insufficient community engagement - More information needed to be provided to affected landowners
Infrastructure – water and waste water
<ul style="list-style-type: none"> - Water pressure already an issue in Appin - No clear plan for water and waste water in Greater Macarthur - Water supply needs greater consideration - Upper Nepean Scheme to supply raw water to Appin already under stress (Cataract Dam got down to 27% recently) - Need to provide a resilient system for drought times and increase demand. - No Plan B for the area.
Traffic
<ul style="list-style-type: none"> - Surrounding suburbs will also be impacted e.g Douglas Park and Menangle - Roads already at capacity - Congestion - Safety issues on Appin Road - Insufficient upgrades proposed to Appin road to facilitate the additional population - Appin Road alternative needed - Connection to Wollongong needs to be considered – impacts of seasonal traffic in summer - Traffic, freight and public transport planning needs to be coordinated.
Density
<ul style="list-style-type: none"> - Medium density not in keeping with Appin and surrounds
Increased impervious surfaces
<ul style="list-style-type: none"> - Increased urban heat island effect - Impact of run off on waterways
Green space / open space
<ul style="list-style-type: none"> - Reduction in green
Air quality
<ul style="list-style-type: none"> - An independent air quality testing needs to be undertaken - Additional cars, homes and reduced vegetation will increase pollution levels. - Impact of pollution on health - Ozone level already breach ambient air quality Ozone criteria

8 CONCLUSION

Wollondilly Shire Council resolutely expresses opposition to *Greater Macarthur 2040: An Interim Plan for the Greater Macarthur Growth Area* in any form. Previous experience shows that Council can have little faith that the issues identified in this submission will ever be sufficiently resolved by the Department of Planning and Environment.

Attachment 1: FEBRUARY 2019 ORDINARY COUNCIL MEETING RESOLUTION

RESOLUTION 21/2019

Moved: Cr Matthew Gould

Seconded: Cr Judith Hannan

That the comments in relation to the Greater Macarthur 2040: an interim plan for the Greater Macarthur Growth Area, outlined in this report and summarised below, be forwarded as a formal submission to NSW Department of Planning and Environment for their consideration:

1. **That the Chief Executive Officer makes a submission to Department of Planning & Environment raising the following matters:**
 - (a) Councils clear position on growth in West Appin;
 - (b) Electrified Rail to Wilton; *that services on the southern highlands be increased, express direct peak hour services be returned and a spur railway be built to Wilton;*
 - (c) Public transport;
 - (d) Infrastructure delivery;
 - (e) Sequencing of land release area;
 - (f) Plan inconsistencies;
 - (g) Community engagement;
 - (h) Environmental protection;
 - (i) Resourcing; and
 - (j) Planning Pathways.
2. **That a copy of the final submission be forwarded to the Premier, Opposition Leader, Shadow Planning Minister, and relevant members of the parliament and that a copy of the submission be made available to the Community online.**
3. **That the Chief Executive Officer discuss resourcing implications concerns with the State Government and advocate for assistance.**
4. ***That our previous experience shows that we can have little faith that these issues will ever be resolved by the Department of Planning.***
5. ***That Council submission be totally clear that we do not support Macarthur 2040 in any form.***

On being put to the meeting the motion was declared **CARRIED** 8/0

In Favour: Crs Judith Hannan, Robert Khan, Michael Banasik, Blair Briggs, Matthew Deeth, Matthew Gould, Simon Landow and Noel Lowry

Against: Nil