

# **PRELIMINARY SOCIAL INFRASTRUCTURE AND OPEN SPACE NEEDS ASSESSMENT**

**North Appin**

**Prepared for Ingham Property Group  
20 June 2023**

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Project code	P0043207
Report number	Final (preliminary assessment)

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# 1.0 INTRODUCTION



# 1.1 INTRODUCTION

## Purpose of the study

This study has been prepared by Urbis Pty Ltd on behalf of Ingham Property Group (IPG) to accompany a planning proposal. The overall purpose of this study is to provide initial recommendations for social infrastructure and open space provision to support the needs of the incoming population to the proposal site. The findings of this study will inform the planning proposal and next stages of detailed planning and development delivery.

### Limitations of the study

The findings and recommendations of this study have been informed by a desktop review, involving an evidence-base of strategic policies and documents, existing infrastructure, benchmarks, and best-practice trends and practices.

Stakeholder consultation was not able to be conducted at this stage of the study. Stakeholder consultation provides key insights into population needs, existing provision, function and purpose of proposed facilities and preferred operating models. Therefore, there are some limitations to the findings and recommendations included.

## Approach to assessment

There are several key inputs required to determine the social infrastructure and open space needs of a community. These key inputs have been broken up into two stages as shown in Figure 1.

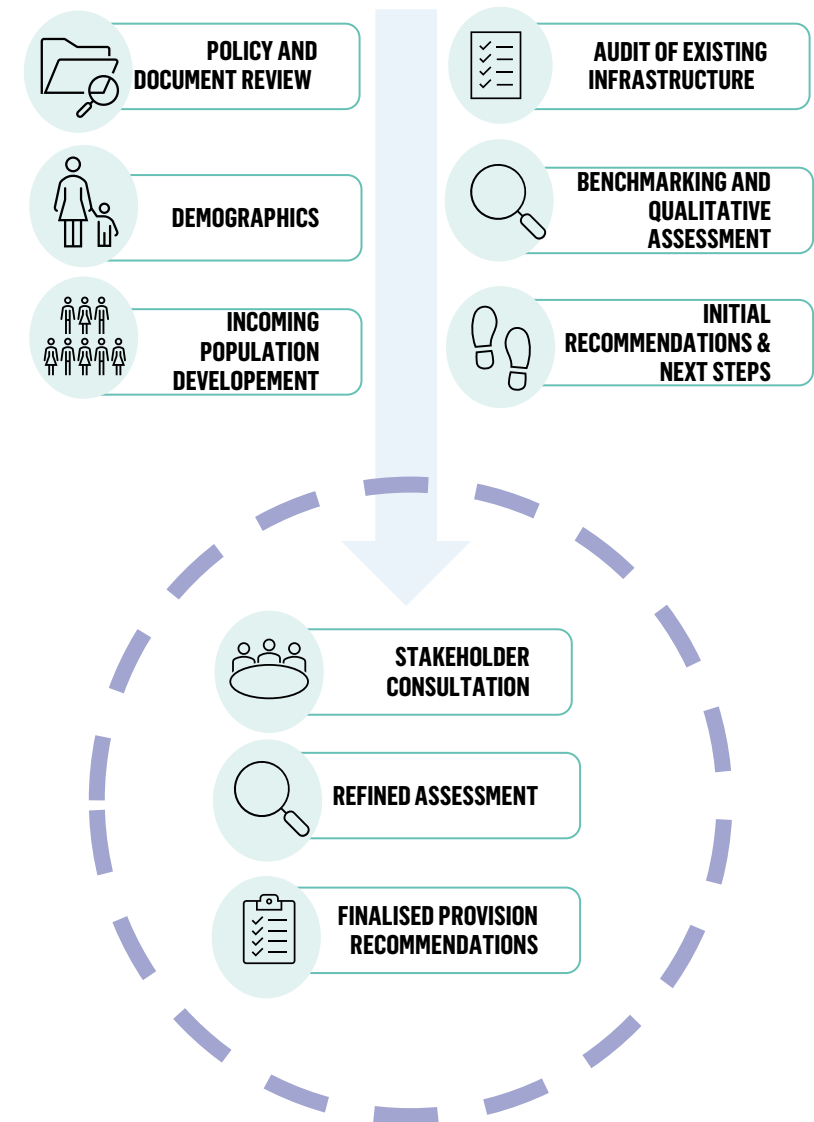
Stage 1:

- Strategic policy review
- Demographic analysis of the current and future population
- High level audit of existing social infrastructure and open space near the site
- Benchmarking and qualitative assessment to identify the future demand for social infrastructure and open space
- High level assessment of the Draft Structure Plan and provision of recommendations for further tasks and enhancements.

### Stage 2 (to be completed in later stages):

- **Consultation with relevant key stakeholders, including Wollondilly Shire Council, Schools Infrastructure NSW, and the Local Health District.**
- **Updating recommendations on provision and locations of facilities based on stakeholder feedback.**

Figure 1: Approach to assessment



# 1.2 ABOUT THE NORTH APPIN PRECINCT

## Greater Macarthur Growth Area

Appin is currently home to 2,633 people, most of whom live within the historical town centre of Appin Village. The Department of Planning and Environment (DPE) recognises Appin as a land release precinct, forming part of the broader Greater Macarthur Growth Area, as shown in Figure 2. The North Appin Precinct is undergoing considerable change, with significant greenfield development planned for sites within and outside the precinct, including the neighbouring suburbs of Gilead and Wilton.

## Site context

The site is situated in the North Appin Precinct of the Greater Macarthur Area and will form a northern extension of the existing Appin Village and located within the Wollondilly local government area (LGA) and a small part of the Campbelltown LGA. Most of the site has been cleared and is used for cattle grazing. There is currently no existing social infrastructure on site.

Appin residents are currently serviced by existing local social infrastructure in the Appin Village and have access to regional social infrastructure and recreation in the Campbelltown sub regional centre, north of the site. Significant development is also planned south of the site at Wilton, with plans to provide additional regional infrastructure.

## Proposed infrastructure in the surrounding area

Currently, there are other planning proposals on exhibition for the Greater Macarthur Area. Of most relevance are the Appin (part) Precinct and Gilead Stage 2, led by Walker Corporation and Lendlease respectively. Preparation of these proposals included assessments of social infrastructure and open space. These assessments made several recommendations in relation to the provision of a range of local, district and regional infrastructure, including:

- Community and multipurpose centres
- Primary and high schools
- Long day care and out of school care centres
- General practice clinics
- Recreation and sport facilities, including an aquatic centre, outdoor courts, sportsfields, and a regional level open space.

Figure 2: Site context

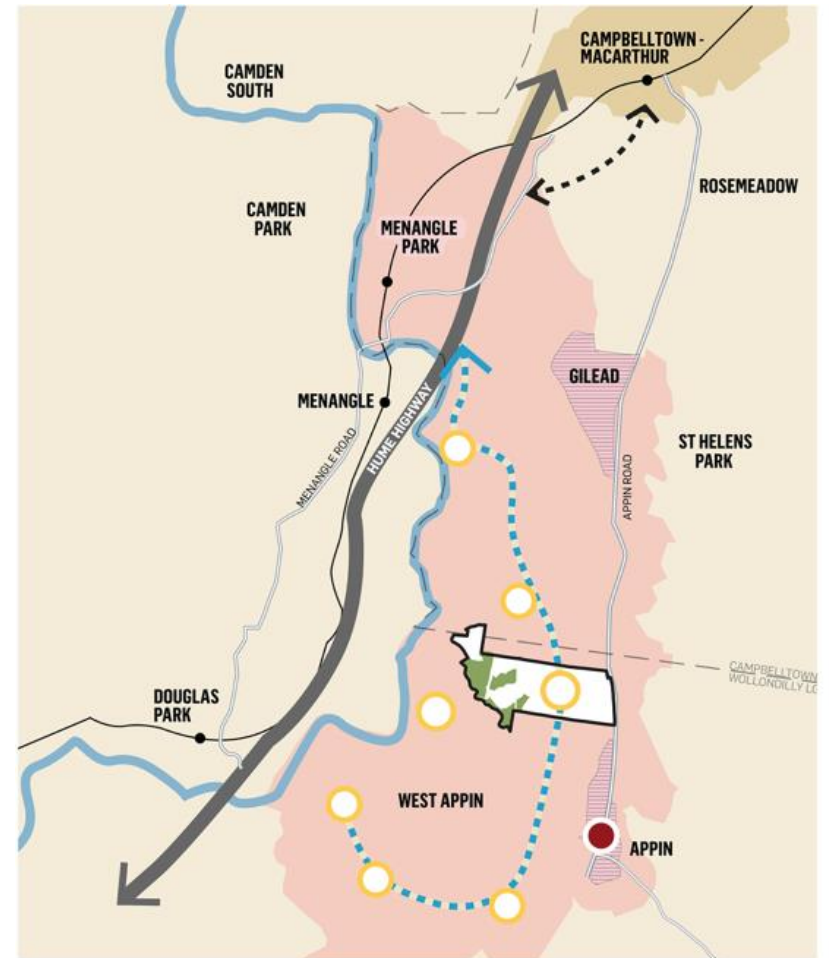


Figure 5 Retail Demand Analysis

### RETAIL FACILITIES

Site Boundary

Existing Local Centre

Proposed Local Centre

Transport Corridor

Campbelltown - Macarthur

Source: Prepared by Urbis for IPG, 2023

# 1.3 ABOUT THE PROPOSAL

## Project proposal

This Planning Proposal is seeking to rezone approximately 301 hectares of land in the North Appin (part) Precinct. In November 2022, the NSW Government announced that the Department of Planning and Environment (DPE) will be responsible for assessing the Planning Proposal, with the site key to unlocking housing supply in the Greater Macarthur Growth Area.

The NSW Government has identified the North Appin Precinct is to deliver up to 5,000 new homes and secure and implement a Koala Corridor along Ousedale Creek. The site is under the single ownership of IPG and forms the majority of the North Appin Precinct, allocated by the Greater Macarthur 2040 Structure Plan.

The site presents an immediate opportunity to deliver approximately 3,000 new homes as part of an integrated and holistically planned precinct.

The intended outcome of this Planning Proposal is to amend State Environmental Planning Policy (Precincts – Western Parkland City) 2021 (Precincts SEPP) with a new Appendix to include the site and rezone the land to the following:

- UD Urban Development
- SP2 Infrastructure
- C2 Environmental Conservation.

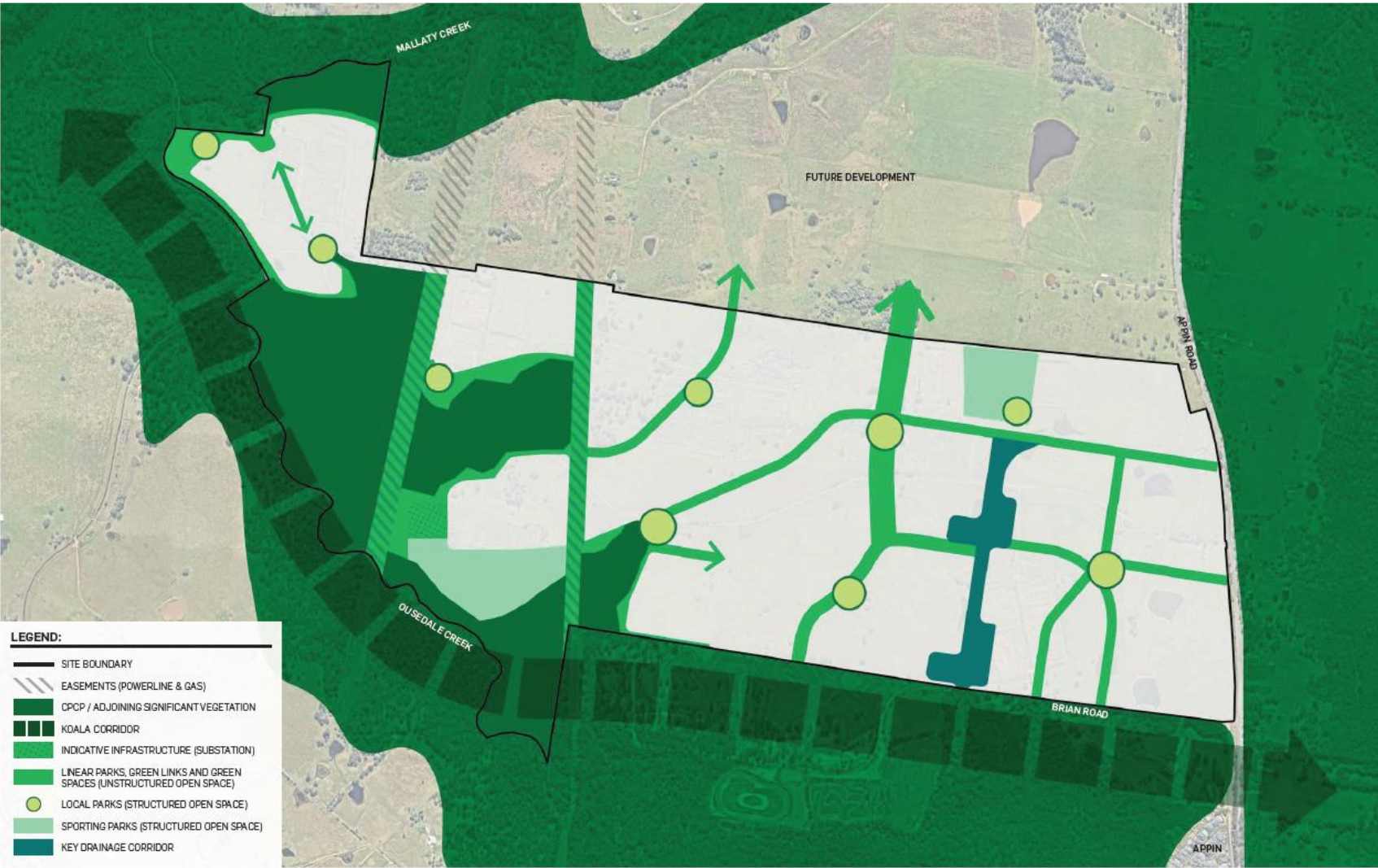
Figure 3: Draft Structure Plan



Source: Prepared by Urbis for IPG, 2023

# 1.3 ABOUT THE PROPOSAL

Figure 4: Draft Green Connectivity Plan



**NORTH APPIN**  
GREEN CONNECTIVITY PLAN

DATE: 06.06.2023  
JOB NO: P0038814  
DWG NO: PP01  
REV: 4

1:10,000 @ A3

0 100 200 300 400 500 600 700 800 900 1000

# 1.4 DEFINING SOCIAL INFRASTRUCTURE AND OPEN SPACE

## Defining social infrastructure

Social infrastructure is a broad term, with a range of understanding and meanings. The Australian Infrastructure Audit defines social infrastructure as “the facilities, spaces, services and networks that support the quality of life and wellbeing of our communities” (2019: 388). In this sense, social infrastructure can be seen as a combination of ‘hard’ infrastructure (i.e. the buildings and spaces which serve a social need) and ‘soft’ infrastructure (i.e. the programs, classes and networks provided from a building or space).

This assessment examines the likely need for hard infrastructure. The types of social infrastructure assessed in this study are outlined in Table 1.

## Defining open space



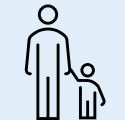

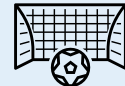
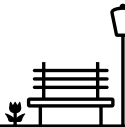
Open space comes in a variety of forms, from structured sportsfields and recreational spaces to natural ecosystems. All open space types have a role in supporting the social, health and wellbeing, environmental and economic needs of communities.

This assessment addresses the provision of public open space which can support outdoor recreation uses. As outlined by the GANSW draft Greener Places Design Guide (2020), outdoor recreation encompasses a range of activities that people undertake for fun, relaxation or fitness. This includes activities such as formal sport, self-directed exercise, appreciation of nature, socialising, picnicking, walking and informal group activities. Some of these activities are organised, while others are more informal.

The types of open space that can support recreation can therefore be classified by two key categories: open space for structured recreation; and open space for unstructured recreation. These are outlined in Table 1. It is important that both structured and unstructured recreation uses are provided when planning for open space. This enables the community to have access to a range of recreational opportunities, which are not dominated by one particular setting.

This assessment considers the range of open space areas and settings that can support structured and unstructured recreation.

Table 1: Types of social infrastructure and open space considered in this assessment

	<b>Community and cultural facilities</b> <ul style="list-style-type: none"> <li>▪ Multipurpose community centres, halls and meeting rooms</li> <li>▪ Libraries</li> <li>▪ Community arts and creative spaces</li> </ul>
	<b>Education facilities</b> <ul style="list-style-type: none"> <li>▪ Primary school</li> <li>▪ High school</li> </ul>
	<b>Childcare centres</b> <ul style="list-style-type: none"> <li>▪ Long day care centres</li> <li>▪ Outside School Hours Care (OSHC) centres</li> </ul>
	<b>Health facilities</b> <ul style="list-style-type: none"> <li>▪ Community health centres</li> <li>▪ Medical centres and General Practitioners (GPs)</li> </ul>
	<b>Open space for structured recreation</b> <ul style="list-style-type: none"> <li>▪ Sportsfields</li> <li>▪ Outdoor sports courts</li> <li>▪ Local parks with playgrounds and other recreational offerings</li> <li>▪ Outdoor fitness facilities</li> </ul>
	<b>Open space for unstructured recreation</b> <ul style="list-style-type: none"> <li>▪ Parklands</li> <li>▪ Natural areas and bushland</li> <li>▪ Linear walking and cycling trails and accessible riparian areas</li> </ul>

# **2.0 CURRENT AND FUTURE CONTEXT**



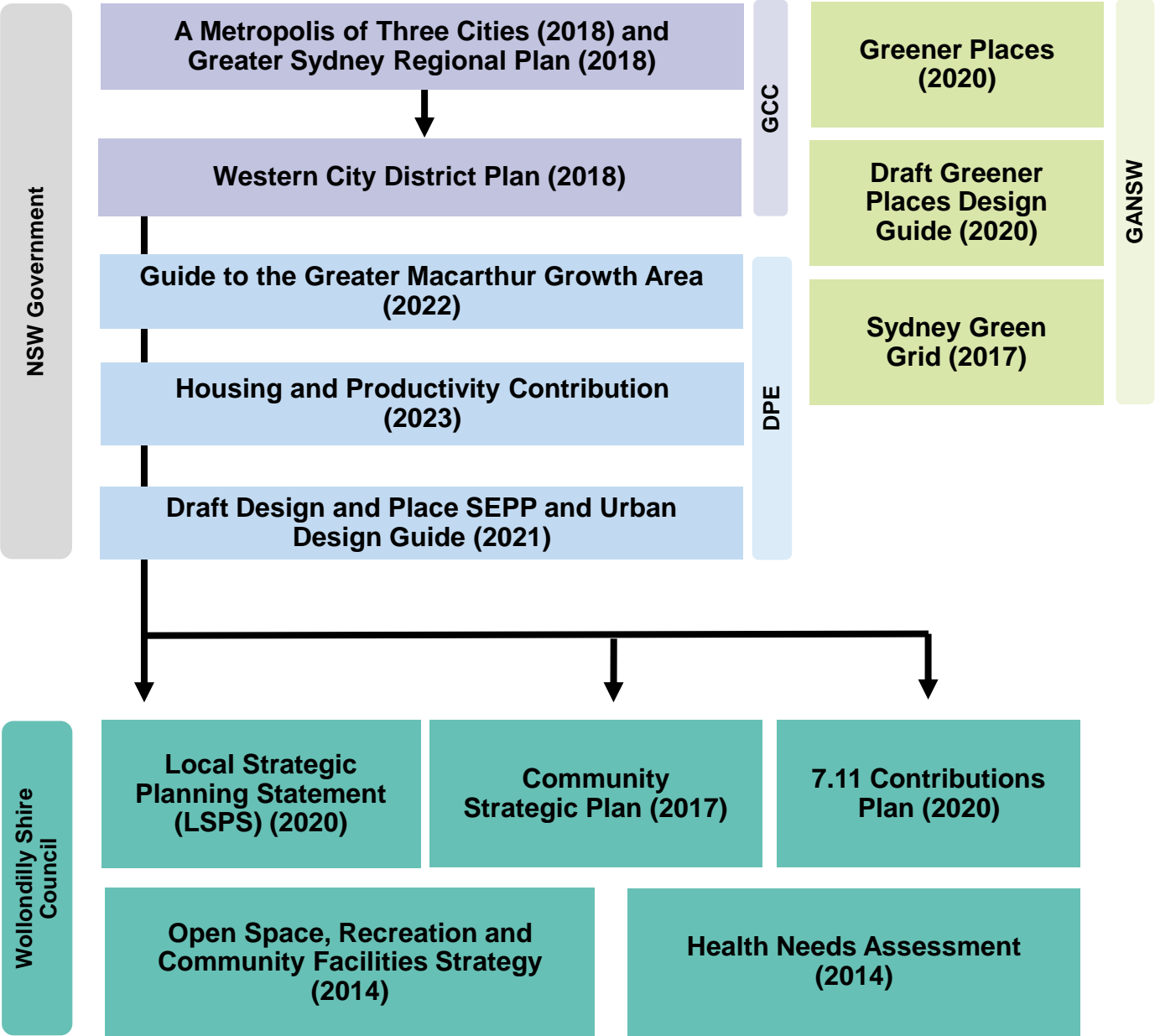
# 2.1 STRATEGIC FRAMEWORK OVERVIEW

A range of state and local strategic planning documents have been developed to guide the provision of social infrastructure and open space in Wollondilly LGA.

These documents outline desired land use objectives, strategic development priorities and community aspirations for the future of the area. They also outline key community needs and guiding principles around the provision of social infrastructure and open space.

The following diagram outlines the strategic documents which were reviewed as part of this assessment. The directions contained in these documents provide a basis for the approach for social infrastructure and open space assessment and recommendations for the site.

Figure 5 Reviewed documents



## 2.2 SOCIAL INFRASTRUCTURE AND OPEN SPACE DIRECTIONS

The North Appin Precinct is located within the LGAs of Wollondilly Shire and Campbelltown City. As a result, there are many documents that guide the planning and provision of social infrastructure and open space in the LGAs and identified growth areas. Relevant principles and strategic directions from key state and local documents are summarised on this and following pages.

### STATE DIRECTIONS



#### Accessible and co-located open space and social infrastructure

- Social infrastructure should be co-located and accessible, with direct walking and cycling connections that can be used by people of all ages and abilities
- Ease of infrastructure access is critical for the community to be able to enjoy and use public open space and recreation facilities
- The ability of residents to gain access to public open space within an easy walk from home, workplaces, and schools is an important factor for quality of life.
- The geographic distribution of open space is a key access and equity issue for the community.



#### Multipurpose, intergenerational and resilient social infrastructure

- Create places where a diverse local community can come together
- Multipurpose and intergenerational facilities will be essential in land release areas to improve use of and access to social infrastructure
- Opportunities for shared use and joint use partnerships is encouraged in growth areas to support better use of social infrastructure. Such opportunities include shared use of school sites after hours
- Critical infrastructure, such as health facilities, childcare centres and schools should be located outside the probable flood extent.



#### Optimise open space for recreation, sport and social activities

- Developing innovative ways to optimise open space for recreation, sport and social activities will become increasingly important as the population grows
- The range of open space setting types within an urban area will determine the diversity of recreation opportunities for communities
- Quality, quantity and distribution are key considerations for open space planning. These considerations should be incorporated in the development of new neighbourhoods
- Size and shape of open space has a direct bearing on the capacity of that open space to meet and accommodate recreation needs.



#### Value and preserve the natural environment in new places

- Incorporate development that protects, maintains and restores waterway health and is aligned with the community's environmental values and use of waterways
- Integrate Green Plans that identify how a 40% tree canopy cover, green links, tree lined streets and shaded environments can be achieved
- Areas of existing vegetation should be considered as part of the network of open space and amenity.

## 2.3 SOCIAL INFRASTRUCTURE AND OPEN SPACE DIRECTIONS

As the site is predominantly located within Wollondilly LGA, Wollondilly Shire Council policy directions have guided this assessment and are summarised below.

### WOLLONDILLY SHIRE COUNCIL DIRECTIONS

#### Multipurpose and adaptable facilities



- Future open space should be provided in accordance with Council's multipurpose facilities model. This model is currently under development but is intended to facilitate adaptable spaces which can accommodate multiple user groups and changing community needs
- The nine key principles for open space planning in Wollondilly comprise of equity of access, public transport connections, visibility, flexibility, safety, future adaptability, sustainability, sense of place and avoiding land use conflict
- Open space, recreation and community facilities should be clustered or co-located with other activity generating uses (e.g. shops, schools, childcare) to promote access, activation and utilisation
- Social infrastructure should be of a sufficient size and design to enable expansion and adaptation over time.

#### Infrastructure that supports healthy and safe lifestyles



- Urban tree canopies should be protected, retained and increased in growth areas to combat urban heat island effects and diversify tree species
- Local health services, programs and facilities should be developed early in the planning process and focus on preventative health measures
- The urban environment should encourage and support people to live healthy lives. Principles around accessibility, equity and social cohesion should therefore be imbedded in any new facilities and places
- Design facilities in accordance with CPTED principles to enable the safety and security of all users.

#### Enhance the public domain



- Social infrastructure should contribute to the public domain and sense of place through responsive and quality building design and incorporation of community values
- Culture and heritage should be celebrated in the design of facilities, with the design of open spaces reflecting the natural and cultural context
- Central and accessible facilities should be connected to public transport and pedestrian and cycling networks to minimise car dependency. Ideally facilities should be within 400m of public transport or have linkages to other pedestrian/cycling networks.

# 2.4 EXISTING AND FUTURE COMMUNITY PROFILE

This section provides an overview of the current demographic profile of the Appin community using data from the 2016 and 2021 ABS Census from Profile id and population projections from Forecast id. Profile id provides data related to small areas.

While the North Appin Precinct falls within the LGAs of Wollondilly and Campbelltown, only a small portion of the site falls within the Campbelltown LGA. Therefore, the suburb of Appin has been used for this assessment.

## Appin community profile

In 2021, Appin was home to 3,212 permanent residents, representing about 6% of Wollondilly LGA. Key characteristics of this community are outlined in Figure 5.

## Future population

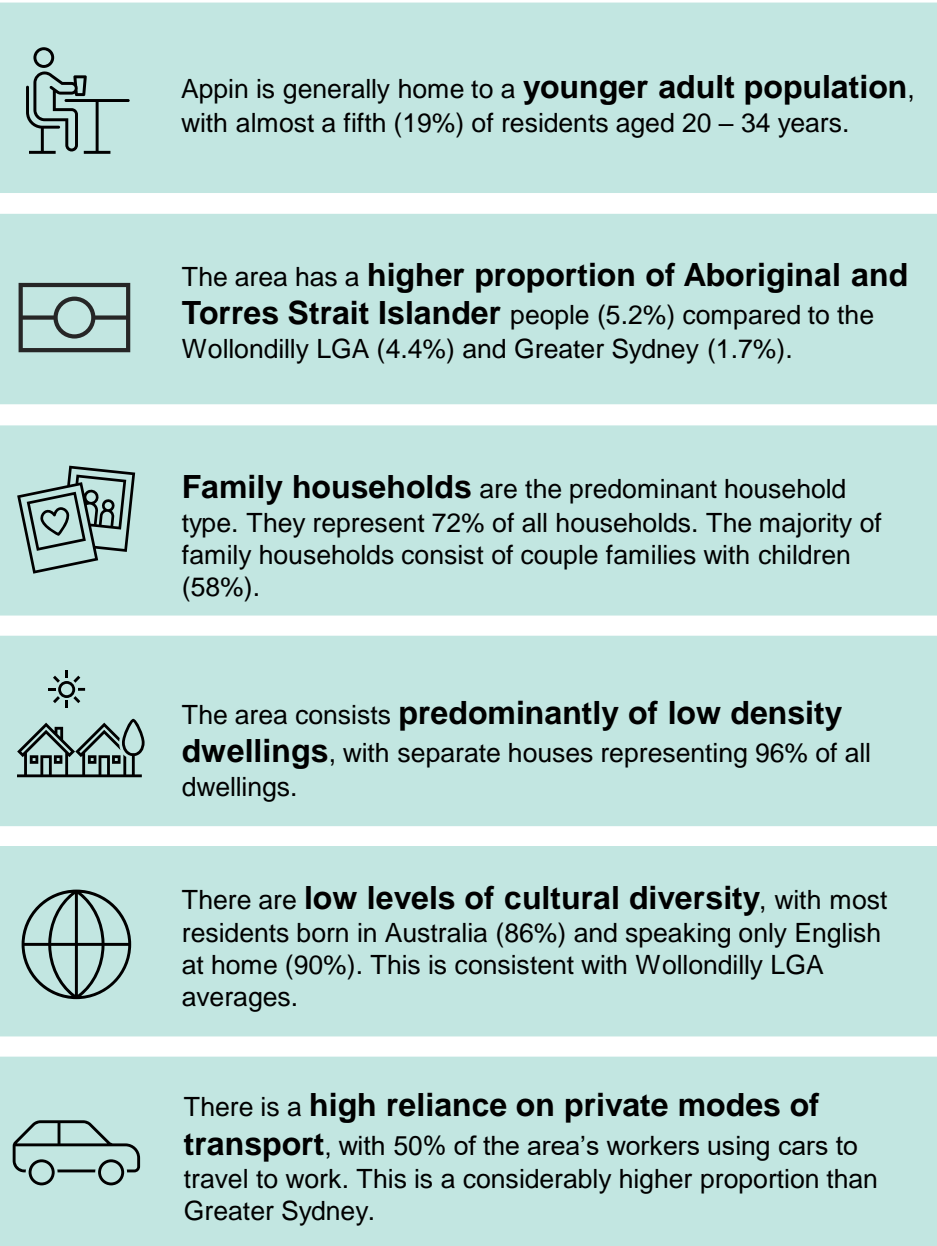
By 2041, the population in the Appin – Cataract – Darkes Forest area is expected to grow minimally and will be 3,944. This does not consider the population growth from the Greater Macarthur Growth Area, The population growth of Appin’s suburb is predicted to be much higher.

Based on the forecast, the future population of the Appin suburb will have similar characteristics to the existing community. This is because new growth areas have higher proportions of young children and families. However, it is estimated that there will be higher levels of cultural diversity as this is a key trend that is occurring in similar new growth areas.

### Demographic implications for social infrastructure and open space planning:

- A low-density area presents challenges for the provision of social infrastructure and open space as it can increase occupancy rates and private vehicle reliance.
- To support a healthy population, residents require access to **usable, activated and multi-functional** open space. This is particularly important for young children and adults who need access to a range of open space areas within walking distance from their homes.
- A higher proportion of Aboriginal and Torres Strait Islander people will likely see greater demand for **inclusive and accessible spaces** that acknowledge and celebrate culture.

Figure 6: Key characteristics



# 2.5 AUDIT OF EXISTING SOCIAL INFRASTRUCTURE

## Overview of social infrastructure

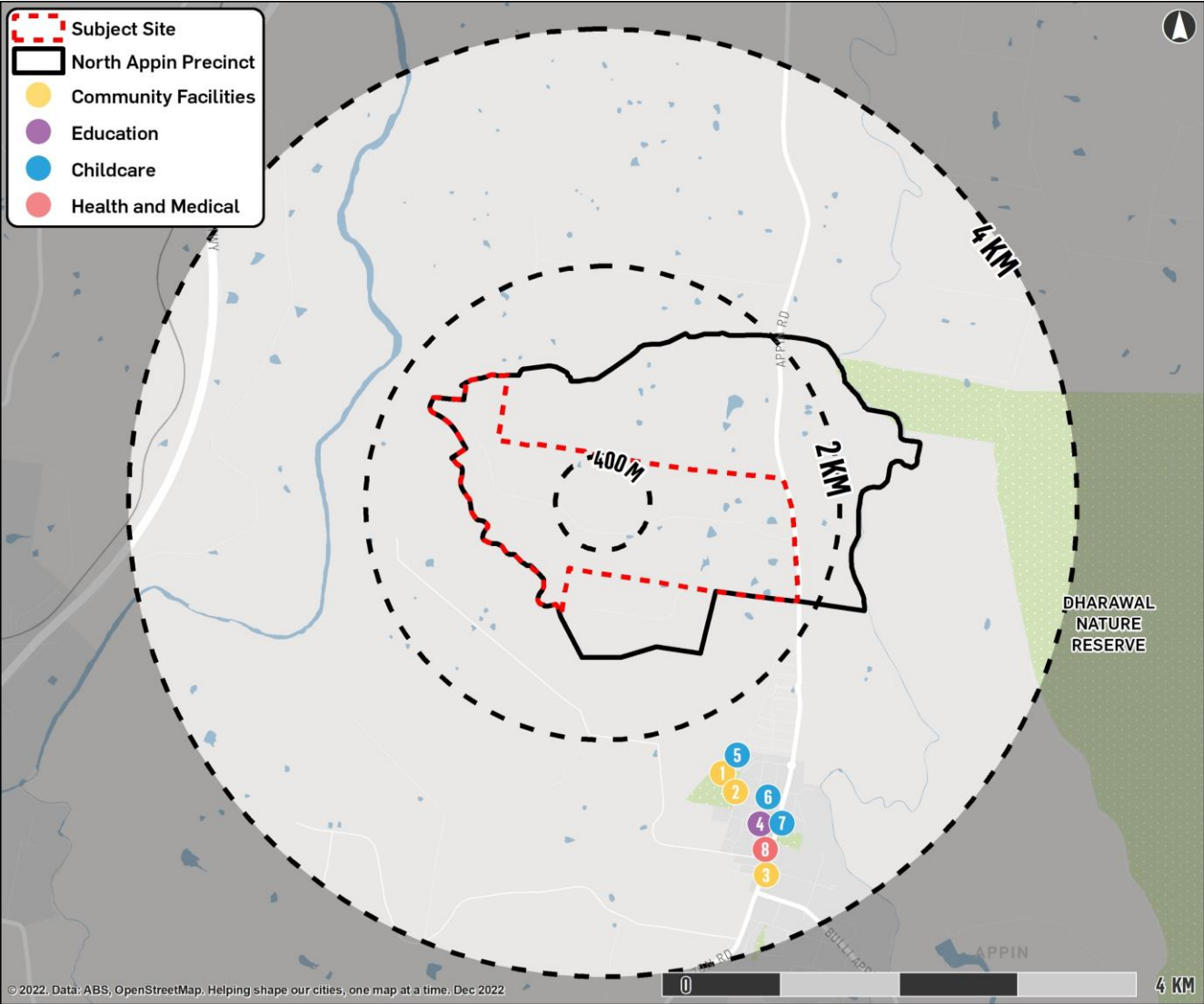
Most existing social infrastructure is concentrated in the Appin Village Centre, to the south of the site, and consists of local level facilities which predominantly serve the surrounding residential community.

Existing social infrastructure is shown in the Figure 6 and in Table 2. The North Appin Precinct and the subject site are also shown.

Table 2: Social infrastructure facilities within the 4km catchment

Legend	
1	Appin Community Hall
2	Appin Men's Shed
3	Appin Historical Society
4	Appin Public School
5	Bright Sparks Early Learning – Rixon Road
6	Bright Sparks Early Learning – Winton Street
7	Bright Sparks Outside of School Hours Care
8	Appin Medical Centre

Figure 7: Existing social infrastructure in Appin



Source: Urbis

# 2.6 AUDIT OF EXISTING OPEN SPACE AND RECREATION

## Overview of open space and recreation

Existing open space and recreation facilities are concentrated in the Appin Village Centre and are all local level facilities that predominantly serve the existing residential community.

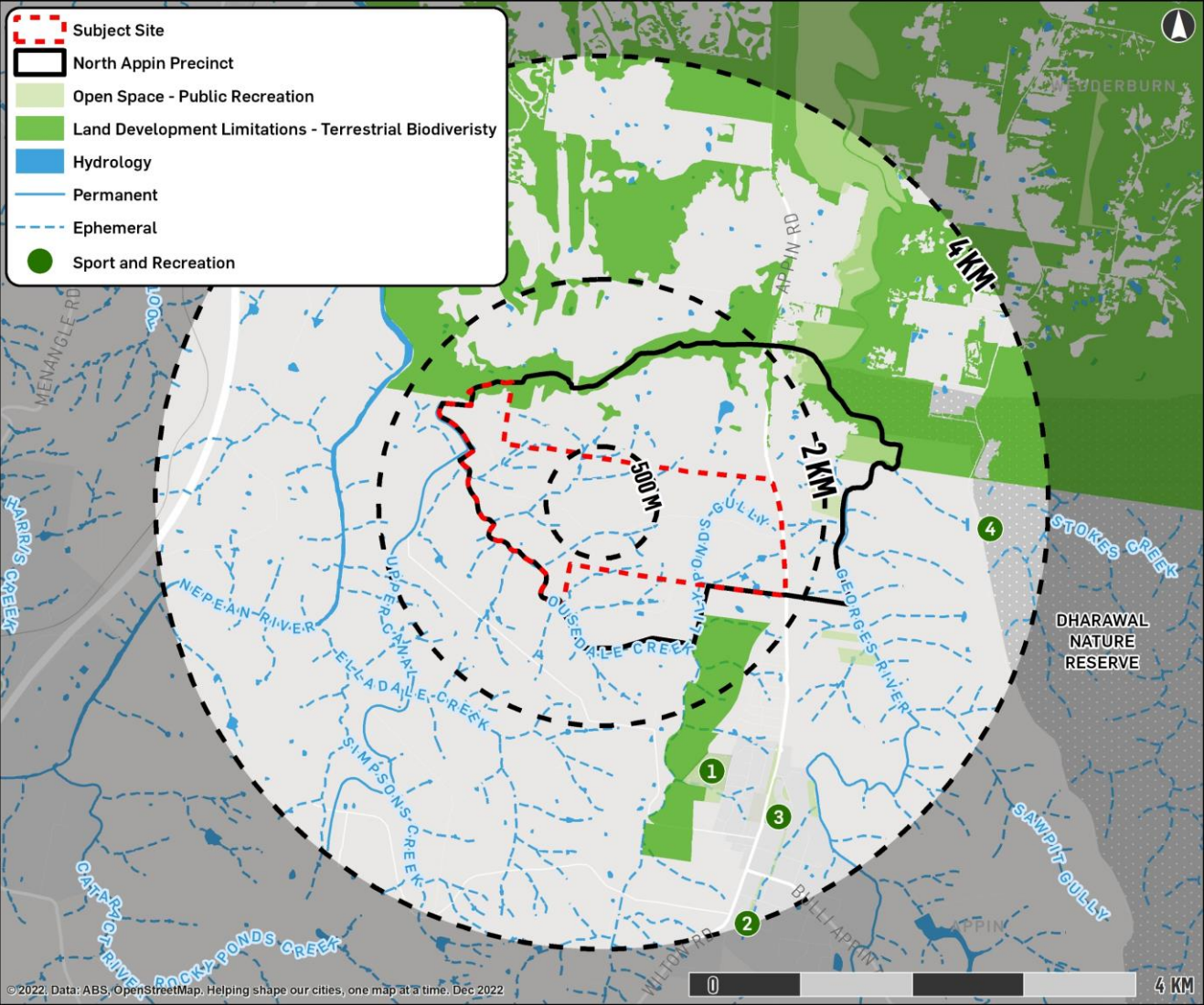
Existing open space and recreation facilities are shown in the Figure 7 and in Table 3. The North Appin Precinct and the subject site are also shown.

The remaining open space in the Appin area comprises of conservation land, biodiversity conservation areas, and bushland. As several parts of the biodiversity conservation areas are not accessible to the public, these areas have not been considered as usable open space in this assessment.

Table 3: Open space and recreation facilities within the 4km catchment

Legend	
1	Gordan Lewis Oval
2	William Woods Reserve
3	Appin Park
4	Dharawal National Park

Figure 8: Existing open space in Appin



Source: Urbis

## 2.7 ROLE OF SURROUNDING SERVICES

### Overview of planned provision for regional infrastructure

Wilton is located south west of the Appin and North Appin Precincts and is also part of the Greater Macarthur Growth Area. Similar to Appin and North Appin, Wilton has been the subject of large scale planning and is expected to support 15,000 new homes over the next 20 years (DPE, 2018).

Consultation undertaken with Wollondilly Shire Council for the development of Appin Part Precinct indicated that planning for Wilton is currently underway and is intended to serve as the major town centre for the LGA. This includes the provision of regional level infrastructure such as:

- A 5ha regional open space in North Wilton
- An integrated health facility in Wilton Town Centre
- A 500sqm cultural facility in Wilton Town Centre
- A 2,000sqm fire and rescue station, 2,000sqm police station and an ambulance hub in Wilton Town Centre.

### Key implications for this assessment

- Existing facilities within North Appin are of a local level and serve the local community.
- The closest regional level facilities to North Appin are currently within Campbelltown LGA, including Campbelltown Hospital, and will likely serve the North Appin community. Campbelltown Hospital has recently undergone a redevelopment and expansion with the population growth of nearby suburbs in mind.
- Once developed, Wilton major town centre will likely serve the North Appin community and the incoming residential population from the proposal. The planned provision of regional level facilities within Wilton will likely also service this population need for regional level facilities.



# 2.8 INCOMING POPULATION

To assess community needs, it is critical to understand the number of people a proposal will introduce into an area. This is typically understood by applying occupancy rates to the expected development yield to project the likely incoming population size.

## Expected dwelling yield

At this stage, it is anticipated that the site has potential to support approximately 3,000 residential lots, of which approximately 80% will be low density and 20% will be medium density.

## Occupancy rates assumptions

The Wollondilly Contributions Plan (2021) provides occupancy rates for different density dwelling types. These are outlined in Table 4 and have been used in this assessment to project the incoming population of the proposal site.

Table 4: Wollondilly Contributions Plan estimated occupancy rates

Dwelling type	Occupancy rate (per dwelling)
Residential subdivision lot/dwelling house	3.1 persons
Attached dwelling, semi-detached dwelling or multi dwelling house	2.6 persons
Apartment, residential flat building or shop top housing	2.2 persons

## Application of occupancy rates

Based on the occupancy rates in the Contribution Plan, the development is likely to support an incoming population of **approximately 9,000 people**.

Table 5: Expected incoming population (based on Wollondilly Contributions Plan estimated occupancy rates)

Expected dwelling mix	Anticipated dwelling yield	Occupancy rate (per dwelling)	Expected population
Low density	80% (2,400)	3.1 persons	7,440 people
Medium density	20% (600)	2.6 persons	1,560 people
Total	3,000		9,000 people

## 2.9 INDICATIVE AGE PROFILE

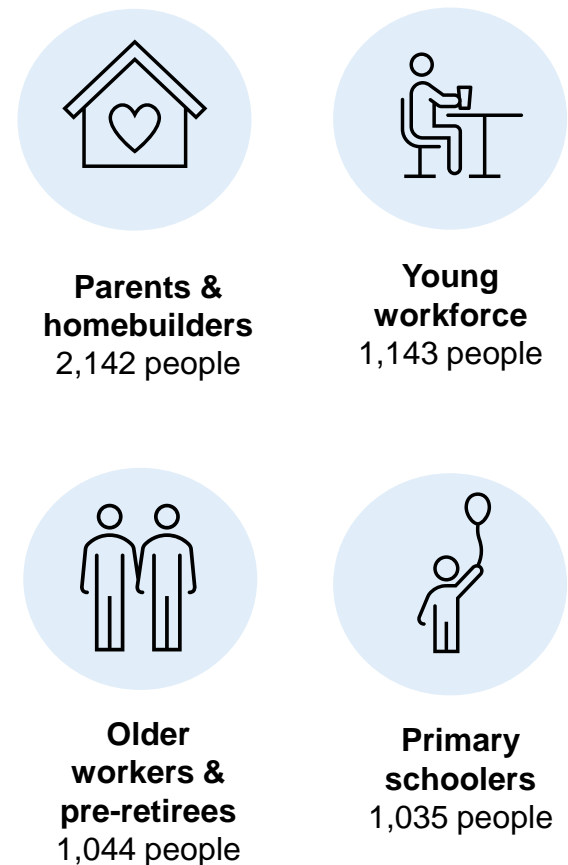
For the purposes of benchmarking, a likely age profile has been developed for the projected population (approximately 9,000 people). This profile has been determined by applying Forecast.id 2036 age profile data from the Appin – Cataract – Darkes Forest area and two comparable greenfield areas: Schofields and Harrington Park. These greenfield areas were chosen based on their comparable dwelling mix to that proposed. As Forecast id. uses small area boundaries, data for Schofields – Nirimba Fields and Harrington Park – Kirkham was used. These areas are relatively consistent with ABS suburb boundaries.

An average proportion for each of these three areas was calculated for each service age group and applied to the incoming population to provide an indication of the likely future age profile, as shown Table 6.

Table 6: Expected age profile of the incoming population based off similar areas

Age bracket	Appin- Cataract – Darkes Forest	Schofields – Nirimba Fields	Harrington Park – Kirkham	Indicative proportion	Likely incoming population to the site
<b>Babies and pre-schoolers</b> 0 – 4	6.8%	9.8%	5.8%	7.5%	675
<b>Primary schoolers</b> 5 – 11	10.9%	13.7%	10.0%	11.5%	1035
<b>Secondary schoolers</b> 12 – 17	8.9%	9.4%	9.0%	9.1%	819
<b>Young adults</b> 18 – 24	9.0%	7.8%	8.2%	8.3%	747
<b>Young workforce</b> 25 – 34	13.9%	14.9%	9.4%	12.7%	1143
<b>Parents and homebuilders</b> 35 – 49	24.8%	27.0%	19.6%	23.8%	2142
<b>Older workers and pre- retirees</b> 50 – 59	12.4%	9.2%	13.3%	11.6%	1044
<b>Empty nesters and retirees</b> 60 – 69	7.2%	5.0%	11.8%	8.0%	720
<b>Older adults</b> 70+	6.1%	3.2%	12.9%	7.4%	666
<b>Total</b>					<b>9,000 people</b>

Figure 9: Four predominant age groups in the incoming population



# **3.0**

## **SOCIAL INFRASTRUCTURE DEMAND ASSESSMENT**



## 3.1 APPROACH TO DETERMINING NEEDS

### General approach

Planning for future infrastructure, whether in new or established communities, is a complex task. This study takes a good practice approach to identifying social infrastructure needs and requirements through consideration of several inputs. These include:

- Understanding the **site and strategic context** of the area that are guiding future planning decisions, with consideration for stakeholder consultation undertaken
- Understanding the **existing provision of social infrastructure** and identifying key gaps in provision
- Identifying the **demographic characteristics** of the current community and the likely demographic characteristics of the future population to understand future needs and demands for social infrastructure and open space
- Considering **leading practice principles, standards and benchmarks**, and applying these appropriately to the site.

### Standards and benchmarks

There are currently no universal standards or approaches to the planning of social infrastructure in NSW. In the absence of these, most councils have established their own approaches, which has resulted in the adoption of different social infrastructure benchmarks in different places. For the purposes of this study, preference has been given to the benchmarks provided by Wollondilly Shire Council as most of the site is located within this LGA, and where relevant, compared to industry standards to align with best practice.

The rates of provision proposed in this assessment also reflect those utilised for the Social Infrastructure and Open Space Assessment for Appin and North Precincts and Appin (Part) Precinct report (2022) prepared by Urbis on behalf of Walker Corporation. The rates of provision will need to be tested with Council during consultation stages to confirm the approach aligns with their vision for the North Appin (part) Precinct and the site.

Planning for social infrastructure generally operates within a hierarchy of provision, with different scales of infrastructure serving varying sized catchments. As outlined in Figure 9, Wollondilly Shire Council proposes a community facility hierarchy (refer Wollondilly Shire Council Open Space, Recreation and Community Facilities Strategy, 2014) . Using this hierarchy and the expected incoming population size of the site, this study has focused on the provision of **local and district facilities**.

Figure 10: Social infrastructure hierarchy



Source: Adapted from Wollondilly Shire Council Open Space, Recreation and Community Facilities Strategy (2014)

## 3.2 SOCIAL INFRASTRUCTURE DELIVERY TRENDS

Over time, the planning and delivery of social infrastructure needs to adapt to changes in the social, economic and environmental context. To meet the challenges associated with delivery of greenfield development, including population growth and increased urban density, governments around the world are reviewing the way they plan and design social infrastructure. Current trends in the planning and design of social infrastructure are outlined below and have been considered as part of the approach to assessing social infrastructure need and determining recommendations.

### Planning trends



**Co-design** of facilities with the end users to encourage community ownership and a fit for purpose design



**Partnerships** which provide alternative approaches to funding and delivery of infrastructure, including share-use arrangement and public-private partnerships



**Integrated delivery** of community services in a single facility to improve service delivery for and create efficiencies through common areas and amenities



**Accessibility** of facilities by public, private and active transport is maximised to support a reduction in car use and convenience for different users



**Co-location** of social infrastructure to provide user convenience and encourage cross utilisation of clustered facilities



**Extension** of the home as backyards' are shrinking and people need open space and social infrastructure as places to connect and gather with others

### Design trends



**Flexible** spaces and fittings that can respond to changing preferences over time and avoid redundancy of facilities and equipment



**Multi-purpose** facilities and open space that are designed to support a range of user groups, including different ages, abilities and activities in one location to support increased utilisation by creating spaces that serve multiple functions



**Compact** designs that enable the delivery of critical social infrastructure in areas that are constrained by spaces or land values



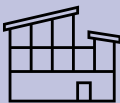
**Technology** enabled facilities, including free wi-fi for users, online booking systems and high-tech maker spaces that may provide 3D printing, computer programming and music and movie production



**Smart buildings** and spaces to help social infrastructure providers minimise the long term maintenance and environmental costs of infrastructure

# 3.3 COMMUNITY AND CULTURAL FACILITIES

## Key features and inclusions



- Community facilities and libraries are critical to supporting the health and wellbeing of communities. They provide spaces to socialise, create and connect with others, and support the provision of community, health and social services.
- Facilities should be staffed and/or programmed and include a variety of spaces of different sizes that can accommodate a broad range of community programs, activities and events, as well as the provision of community services.
- Rooms and spaces within centres should be flexible and adaptable to enable different configurations and uses.
- Unstructured spaces that facilitate meeting and gathering should also be incorporated. This can include foyers and lounge areas.

## Existing provision

- There are three community and cultural facilities currently in Appin; Appin Historical Society, Appin Community Hall and Appin Men’s Shed. The Appin Community Hall and Appin Men’s Shed are co located with the Sportsground Parade, adjacent the Gordan Lewis Oval.
  - The Appin Community Hall provides a single space with capacity for up to 269 people. The hall is available for community hire and is supported by amenities including a kitchen and accessible toilets.
  - The Appin Men’s Shed is used exclusively by the Men’s Shed Community Group and was upgraded in 2018 to increase the floorplate from 15sqm to 500sqm. The Men’s Shed is equipped with workbenches as well as a meeting room, kitchen and lounge area.

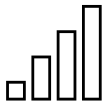
## Target provision



- District multipurpose community centre – **1 for every 20,000 – 50,000 people**
- Local multipurpose community centre – **1 for every 10,000 – 20,000 people**. 80sqm per 1,000 people
- Branch library – **42sqm for every 1,000 people**

Source: Adapted from Wollondilly Shire Council Open Space, Recreation and Community Facilities Strategy (2014) and NSW State Library Population Based Calculator

## Current provision



**2 community facilities and 1 cultural facility in Appin**

## Assessment of likely needs

- While consultation with Council is required to understand the quality and capacity of existing facilities, existing facilities in Appin Village will not adequately service the needs of the incoming population. Based on a radius catchment, these facilities are located approximately 3km from the site and therefore are not locally accessible.
- Based on proposed benchmarks, the incoming population (of 9,000 people) will not generate a need for a district facility. It will however generate need for a local multipurpose community centre of approximately 720sqm.
- The incoming population will also generate need for approximately 380sqm of library space.

## 3.4 SCHOOLS



### Key features and inclusions

- Where possible, located to promote shared use of facilities, open spaces and resources.
- Joint and shared community and school use arrangements of facilities and open space create efficiencies and support the provision, management and maintenance of high quality facilities.
- Safe walking and cycling infrastructure, as well as open space connections to schools should be provided.
- New school sites and school developments should align with School Site Selection and Development: a guideline for determining appropriate school sites (SINSW, 2020) directions.

### Existing provision

- The site is in the catchment for Appin Public School (335 students) and Ambarvale High School (843 students enrolled). Ambarvale High School is located in the Campbelltown LGA, approximately 11km from the Appin Village.
- Non-government school options are located in the Campbelltown or Camden LGAs.
- Appin is also serviced by two of the main tertiary providers in NSW; Western Sydney University (approximately 17km) and the University of Wollongong (approximately 21km).

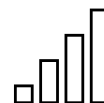
### Target provision



- Primary school – **up to 1,000 student** capacity and an indicative site area of **1.5ha-2ha**
- High school – **up to 2,000 student** capacity and an indicative site area of **2.5ha**

Source: SINSW School Site Selection and Development Guidelines (2020) for suburban/low medium density areas and consultation with SINSW

### Current provision



**1 primary school** in Appin

### Assessment of likely needs

- Based on proposed benchmarks, the incoming population will generate demand for a new primary school. The incoming population will likely generate demand for approximately of 1,035 primary school places (ages 5 to 11 years).
- The incoming population will generate demand for approximately 819 high school places (ages 12 to 17 years). While this alone does not represent demand for a new high school, the incoming population will contribute to cumulative demand on the surrounding high school network.

# 3.5 EARLY EDUCATION AND CARE CENTRES

## Key features and inclusions



- The majority of childcare centres are typically driven by the private market. Precise requirements are not usually developed at master planning stage. There are however advantages to early identification.
- Childcare centres should be accessible and central to the population they serve, with consideration to transport connections and resident and worker movements. Centres should also be co-located with other services to maximise user convenience and encourage greater cross utilisation of clustered facilities.
- Out of School Hours Care (OSHC) services are best provided on or co-located with primary school sites.

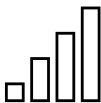
## Target provision



- Long day care – **1 place for every 2.48** children aged 0-4 years\*
- OSHC – **1 place for every 2.70** children aged 5-11\*
- Approximately **80 places** each centre for long day care and OSHC\*\*

Source: \*City of Parramatta Community Infrastructure Strategy (2019), \*\*a review of other centres within the nearby suburbs and gathered knowledge in the sector

## Current provision



**3 long day care centres and 1 out of school hours care centre** in Appin

## Existing provision

- Appin currently has three long day care centres; Bright Sparks Early Learning (Rixon Road) with 78 approved places and limited vacancies, Bright Sparks Early Learning (Winton Rad) with 51 approved places and limited vacancies and Leaping Learners Early Education Centre with 80 approved places and vacancies for all age groups Monday to Friday.
- Appin currently has 1 OSHC centre; Bright Sparks Early Learning OHSC. The centre has 50 approved places with vacancies for all age groups Monday to Friday. The centre is co located with Appin Public School.

## Assessment of likely needs

- Based an incoming population of 675 children (aged 0-4 years), initial benchmarking indicates the incoming population will generate demand for approximately 272 long day care places (or around 3-4 centres).
- Based on an incoming population of 1,035 children (aged 5-11 years), initial benchmarking indicates the incoming population will also generate demand for approximately 383 OSHC places (or around 4-5 centres).
- All the demand will unlikely be absorbed by existing provision, as a desktop review indicates there are limited vacancies in existing centres in the surrounding area.

# 3.6 HEALTH FACILITIES (COMMUNITY HEALTH CENTRES AND GENERAL PRACTITIONERS)

## Key features and inclusions



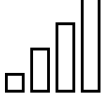
- Community health centres aim to improve the health and wellbeing of people by providing health treatment and care in community settings, away from hospitals.
- Designed to cater to the needs of diverse groups and particularly vulnerable cohorts.
- Trends towards integrating primary and local health services in a single facility (see further information below) and providing community health services from a district multipurpose community centre, through shared outreach consulting spaces.
- Integrated primary and community health care facilities provide multidisciplinary care across a spectrum, within a facility that is designed to maintain flexibility to accommodate different health services and partners.

## Target provision



- Integrated primary and community care centre (multidisciplinary primary and specialist outreach care) – **1 for every 75,000 – 100,000 people**
- Primary health clinic (with 6-8 GPs) – **1 for every 15,000 – 18,000 people**
- Private general practice (with less than 5 GPs) – **1 GP for every 1,846 people**
- Source: Wollondilly Health Needs Assessment and National Standards (2020)

## Current provision



1 family medical practice in Appin

## Existing provision

- Appin currently has one general medical practice; Appin Family Practice.
- Campbelltown Hospital is currently the closest hospital to Appin. The hospital is a major health facility for the Greater Macarthur Region, providing over 300 general surgery and recovery beds and a 40-bed emergency department. A \$632 million redevelopment of Campbelltown Hospital has recently been completed, significantly increasing its service capabilities and carrying capacity.
- Rosemeadow Community Health Centre is the nearest health centre, located approximately 7kms north of the site in Rosemeadow.
- There has been an existing GP shortage in Wollondilly since 2014 and the ratio of 1 GP for every 1,846 people remains significantly lower than South Western Sydney standard. Considering the projected population growth of North Appin and surrounding areas, this shortage will likely be exasperated over the next 20 years (Wollondilly Needs Assessment, 2020).
- Overall, the Wollondilly LGA is reported to have low levels of available and affordable health services.

## Assessment of likely needs

- The incoming population will generate demand for approximately two new private general practices (each with 4-5 GPs). Given the existing GP shortage within the Wollondilly LGA, the delivery of these general practices should be prioritised and available as new residents move into the proposal site.
- The two new private general practices will support additional provision of GPs within the area and will likely have a positive contribution to the existing deficit in the Wollondilly LGA.
- Based on benchmarking application, the incoming population will not alone generate demand for a new integrated primary and community care centre or primary health clinic. It will however contribute to broader demand generated by population growth in the area for these services and facilities.

# 4.0 OPEN SPACE AND RECREATION DEMAND ASSESSMENT



# 4.1 APPROACH TO ASSESSING OPEN SPACE NEEDS

## Open space provision in NSW

Like social infrastructure, there are currently no universal standards or approaches to the planning of open space in NSW. At a state level, the Government Architect of NSW (GANSW) has released a set of guidelines around open space planning under the Greener Places series. The draft Greener Places Design Guide (2020) argues for a performance-based approach which moves away from the quantification of space. The performance-based criteria outlines hierarchy and standards for open space as included in Figure 10 below and Figure 11 overleaf.

In submissions to the draft Greener Places Design Guide, ‘inner metropolitan councils, regional councils, industry and peak bodies support the guide’s performance-based approach...Outer metropolitan councils suggest using a balance of performance based and quantitative spatial standards for open space’ (Greener Places Design Guide Consultation Report 2021, p.8).

The development of the draft DPE Urban Design Guideline (2021) aimed to find this balance and proposed a proportion-based approach, whereby 15% of net developable area (NDA) was set aside for open space. This was complemented by a range of performance-based criteria. The Guidelines were however removed from exhibition in March 2022 alongside the draft SEPP for Design and Place. Similar proportion-based approaches have however been adopted in other states.

## Open space provision in Wollondilly LGA

Wollondilly Shire Council’s Contribution Plan (2020) proposes a population-based benchmark for open space of 2.83ha of open space per 1,000 people. This benchmark is based on patterns of recreation from the UK over 100 years ago. There is no evidence base for the use of this rate as a default standard in 21st century Australia, despite its frequent use in NSW.

Wollondilly Shire Council’s Open Space, Recreation and Community Facilities Strategy (2014) also recognises that provision should be based on a multi criteria approach which considers the local context, accessibility, quality and usability of open space provided and quantitative metrics.

## Assessment approach

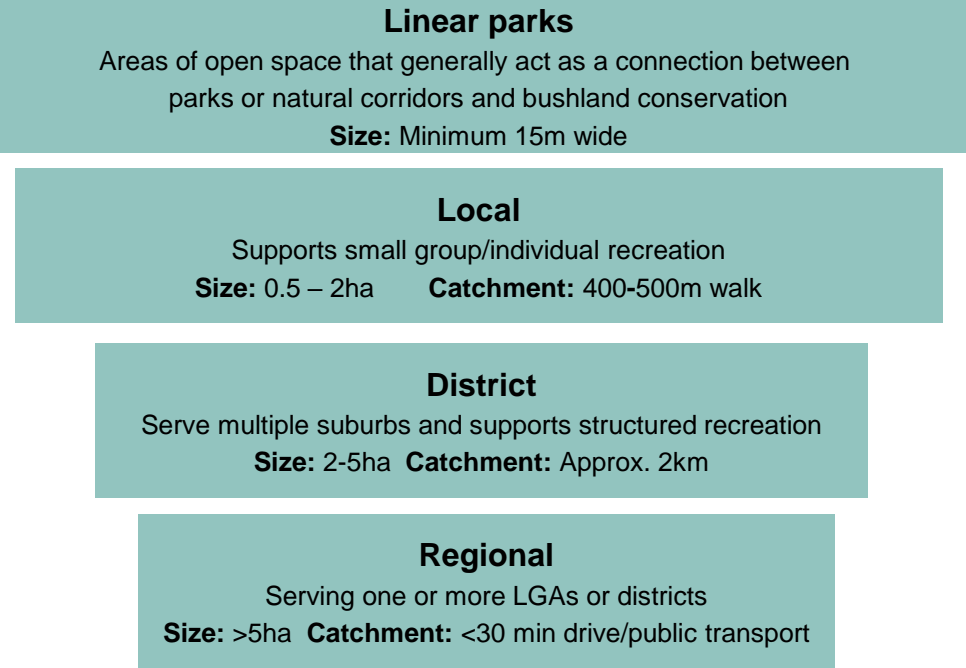
As highlighted, there is currently not an endorsed, evidence based quantitative standard for open space provision in NSW at a state level. In previous studies of a similar scale and significance, Urbis has recommended a proportion based rate of 10-15% of Net Developable Area (NDA) for open space for structured and unstructured recreational uses. This standard draws from robust and contemporary proportion-based benchmarks for open space, including the draft Urban Design

Guideline (2021), Victoria’s Precinct Structure Planning Guidelines for New Communities in Victoria (Victorian Planning Authority, 2021), Planning, Development and Infrastructure Act (Government of South Australia, 2016), Development Control Policy 2.3 (Government of Western Australia, 2021).

In the absence of an endorsed, state-level quantitative standard, DPE has required for this proposal to be assessed against a standard of 2.83ha per 1,000 people (consistent with Council’s Contribution Plan), which also includes 1.37ha of active open space per 1,000 people.

Consistent with Council and state-level guidance, this assessment also considers qualitative standards to assess recommended open space provision. These qualitative metrics are reflected in the Greener Places Design Guide’s hierarchy and standards (Figure 10) and associated performance criteria (Figure 11).







Figure 11: Open space hierarchy and standards



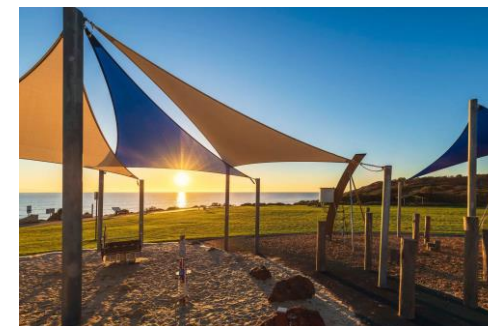
Source: Adapted from Greener Places Design Guide, see Appendix A for more detail

## 4.2 APPROACH TO ASSESSING OPEN SPACE NEEDS [CONTINUED]

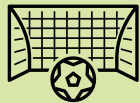
Figure 11: Open space performance based criteria

-  **Quantity** - in low-and high-density areas, good provision of public open space is essential to compensate for the lack of private open space to support active living and contribute to a more liveable neighbourhood.
-  **Accessibility and connectivity** - Ease of access is critical for the community to be able to enjoy and use public open space and recreation facilities.
-  **Size and shape** - Size and shape of open space has a direct bearing on the capacity of that open space to meet and accommodate recreation activities and needs.
-  **Quality** - The quality of design and ongoing maintenance and management is critical to attracting use and activating the open space network.
-  **Distribution** - The ability of residents to gain access to public open space within an easy walk from home, workplaces, and schools is an important factor for quality of life. The geographic distribution of open space is a key access and equity issue for the community.
-  **Diversity** - The range of open space setting types within an urban area will determine the diversity of recreation opportunity for communities.

Source: Adapted from NSW Government Architect (2020) Draft Greener Places Design Guide



## 4.3 ASSESSMENT OF OPEN SPACE AND RECREATION FACILITIES



### Key features and inclusions

- Access to open space is vital to the health, wellbeing and vibrancy of a community. They are multi-value spaces, providing places for people to relax, socialise and exercise, while also supporting environmental outcomes.
- Open space should include areas for structured and unstructured recreation as well as natural areas.
- Facilities to support structured recreation should be multipurpose and flexible to promote utilisation and meet the needs of different uses and user groups.
- Where possible, these diverse range of facilities should be co-located in larger, accessible spaces.

### Existing provision

- There are several recreational facilities within the 4km radius of the site, including the Appin Skatepark, Wollongong Mountain Bike Club, Appin Football Club, Marathur Motorcycle Club, and Delta Force Paintball.
- Appin Football Club operates out of Gordon Lewis Oval. The oval includes a double sports oval, a clubhouse, a hardcourt and a small playground.
- There are several nature reserves surrounding the site. However, these reserves are classified as terrestrial biodiversity and are not considered as accessible open space for recreational uses.

### Type



### Target provision

#### Open space (overall)

DPE's requirements – 2.83ha/1,000 people (of which a proportion of 1.37ha/1,000 people provided as active open space)  
Open space should also comply with draft Greener Places Design Guide hierarchy and standards outlined in Section 4.1 and performance criteria outlined in section 4.2.

#### District sportsground\*

Two double playing fields and amenities for every 10,000 people

#### Multipurpose outdoor courts\*

One court for every 4,200 people  
0.05ha per court plus runoff space and amenities

#### Playspaces\*

One playground for every 500 children aged 0 – 4 years (minimum 50sqm)  
One playspace for every 500 children aged 5 – 11 years (minimum 100sqm)

Source: \*Wilton Priority Growth Area Community Needs Assessment (2018)

### Assessment of likely needs

- Based on the proposed benchmark of DPE's requirements, the incoming population will generate demand for approximately 25.47ha of open space, of which 12.33ha should include active open space (space that can be used for sports and structured recreation).
- Based on the proposed benchmarks, the incoming population would also closely generate demand for:
  - A district sportsground consisting of two double playing fields
  - Two to three multipurpose outdoor courts
  - One to two playgrounds
  - One to two playspaces

# **5.0 HIGH LEVEL ASSESSMENT OF THE DRAFT STRUCTURE PLAN AND RECOMMENDATIONS**



## 5.1 HIGH LEVEL ASSESSMENT OF THE DRAFT STRUCTURE PLAN AND RECOMMENDATIONS

The table below and on the following pages documents an assessment of the Draft Structure Plan against projected social infrastructure and open space needs identified in Sections 3 and 4. The table also includes recommendations for required stakeholder consultation, as well as recommendations for future detailed planning of facilities and spaces.

### Community facilities and libraries



Initial benchmarking indicates the future population of the proposal is likely to generate demand for a new local multipurpose community facility of approximately 730sqm and approximately 380sqm of library space.

**Consultation with Wollondilly Shire Council** is recommended to discuss and confirm facility functions, inclusions and location. A suitable approach could involve:

- Co-locating the multipurpose community facility and library (or satellite library service) in a single building/site in a local multipurpose community hub
- Locating the hub in a central and accessible location in the local centre proposed in the Draft Structure Plan
- Including a range of multipurpose spaces within the facility that will meet the needs of a broad range of users, groups, activities, programs and services.

**Consultation with Council and SINSW** could also involve discussion of potentially co-locating the local multipurpose community hub with the proposed school site (see following section 'Schools') and for shared community and school-use of the facility.

### Schools



Initial benchmarking indicates the incoming population will generate need for one primary school. The incoming population will also generate demand for high school places and contribute to broader demand for high schools in the area.

The Draft Structure Plan includes a site for a school. The nominated site is well-located near the town centre. It is also co-located with open space that has the capacity to include multipurpose sports fields, multipurpose outdoor courts, supporting amenities and playground facilities. SINSW has indicated that the site needs to be a minimum of 2ha to meet requirements for a primary school. The School Site Selection and Development Guidelines (SINSW, 2020) outlines that the site needs to be a minimum of 2.5ha for a high school.

While this assessment has confirmed the need for a new primary school, given the existing gap in high schools in the area and broader population growth projected in the Appin area, further investigations are required to determine the need for a high school. It is also noted the Appin and North Appin Precincts Indicative Plan indicates a notional location for a K-12 school in the northern area.

**Consultation with Schools Infrastructure NSW (SINSW) is required** to discuss capacity of existing and planned schools in the area, the proposal for a school site and, if confirmed, the potential function of the school (e.g primary, high school or combined), requirements and timing of delivery. Detailed planning of any future school site and surrounds should comply with the School Site Selection and Development Guidelines, SINSW (2020) and be undertaken in consultation with SINSW.

## 5.1 HIGH LEVEL ASSESSMENT OF THE DRAFT STRUCTURE PLAN AND RECOMMENDATIONS [CONTINUED]

### Early education and care centres



Initial benchmarking indicates the incoming population will generate need for approximately 3-4 childcare centres and 3-4 OSHC centres. Some of this need will be met in surrounding areas and, for some future residents, in centres close to their workplaces. However, some of the need should be met through provision of additional new childcare centres on site, potentially in the proposed local centre, to enhance accessibility and convenience for surrounding residents. The Draft Structure Plan land allocation can support the delivery of these centres.

Early education and care centres are primarily provided by the private sector, in line with market demand. A smaller proportion of centres are provided by councils and not for profit organisations. Out of hours school care facilities are primarily provided from schools. Similarly, to childcare, some of the incoming needs for OSHC services will be met through existing and future OSHC services in surrounding areas. Any future on site K-12 or primary school should incorporate an OSHC service to meet some of the needs of the incoming population, in particular, students at the proposed school.

**Consultation with Wollondilly Shire Council** is also recommended to discuss Council's interest in owning and/or operating any future early education and care centres on the proposal site.

### Health facilities



Initial benchmarking indicates the incoming population will generate need for approximately two new private general practice centres, with approximately four to five GPs at each centre. GP centres could be provided on site in the town centre and would be best located in an accessible location such as the local centre. The Draft Structure Plan land allocation can support the delivery of these centres.

Locating the centres within the local centre will support good access for the majority of residents to these services (within approximately 1km or a 15 minute walk).

**Consultation should be undertaken with the Local Health District** to discuss how the needs of the incoming population for regional and district health services and infrastructure and how needs can be met through LHD strategic planning. Given the existing GP and health service deficit within Wollondilly, delivery of the two new centres should be prioritised to ensure the needs of the incoming population are met when they move into the area.

# 5.1 HIGH LEVEL ASSESSMENT OF THE DRAFT STRUCTURE PLAN AND RECOMMENDATIONS

## [CONTINUED]

### Open space – overall quantum, distribution, connectivity and accessibility



The Draft Structure Plan includes the quantity of open space to achieve DPE specified benchmarks (refer Section 4.3) providing a minimum of 25.47ha of open space, of which 12.33ha will include active open space i.e. space that can be used for sports and structured recreation.

The Draft Structure Plan includes two larger open space areas accommodating sporting and other recreational uses, several local parks distributed across the site, as well as green links, other green spaces and conservation areas.

The diversity of structured and unstructured recreation spaces supports a multitude of uses, including structured field and court-based sports, picnicking and large and small gatherings, play, fitness activities, walking, cycling etc. This aligns to diversity standards as outlined in Section 4.2.

The distribution of open space achieves the recommended hierarchy and distribution standards outlined in Section 4.1. Detailed planning should ensure all residents be within 2km of a district open space and 400m walking distance to open space (local or district).

The open space network is also accessible and connected. District and local parks are accessible and well connected through a network of linear open spaces and green links, which will promote active transport.

### Sports fields for structured recreation



The Draft Structure Plan proposes a sports field open in the western section of the site accommodating structured sports and recreational uses. To be considered a district level open space, it will need to be approximately 5ha in size. The size and layout will also enable provision two double playing fields, two multipurpose outdoor courts, amenities for sports club storage, carparking, and one playground/playspace to meet benchmark provisions and best-practice trends. The space is well-connected to surrounding residential areas and the local centre through linear green links.

During detailed planning and design stages consideration should be given to:

- The inclusion of cycling paths and picnic amenities within this space to provide additional structured and unstructured recreational activities
- Application of Crime Prevention Through Environmental Design principles,. As this open space is in a more remote location, away from residential areas, opportunities for passive surveillance may be more limited.

The Draft Structure Plan proposes a second sportsfield in the eastern section of the site, adjacent to the school site. This space should be of a size and layout to accommodate structured sporting uses such as multipurpose fields, outdoor multipurpose courts, other recreational opportunities and adequate buffer space. This open space is also connected to a local park that can accommodate other structured recreational uses. Co-location with the proposed school site provides opportunities for joint school and community use.

**Consultation with Council is required** to confirm the potential role and function of the district spaces, requirements and suitable inclusions.

**Consultation with Council and SINSW should be undertaken** to discuss the potential shared school and community use of the eastern district open space, as well as any requirements and key inclusions.

# 5.1 HIGH LEVEL ASSESSMENT OF THE DRAFT STRUCTURE PLAN AND RECOMMENDATIONS

## [CONTINUED]

### Local open space for structured recreation



There are several local parks within the Draft Structure Plan all of which should be larger than 0.5ha (aligning with minimum size provision standards outlined in Section 4.2).

These spaces should be planned to accommodate a range of recreational offerings such as playgrounds/playspaces, picnic areas and facilities and open grass areas for informal sports and activities. Consideration could also be given to the incorporation of a dog park within one or more of these spaces.

Local parks should be planned and designed as a network. There should be a diversity of offerings across the network to meet a broad range of community needs and interests.

### Open space for unstructured recreation



The remainder of open space on site should be provided as other parks (that do not meet the criteria for structured recreation), linear links and green spaces.

The linear green links should be all 15m in width, aligned with standards for open space outlined in Section 4.1. These spaces should provide opportunities for walking and cycling and can support an effective active transport network throughout the site, connecting residential areas to structured open spaces and the local centre.

These spaces should include generous walking and cycling paths and infrastructure, shade, seating and rest areas at intervals.

### Other open spaces



In addition, the Draft Structure Plan includes approximately 56ha of Cumberland Plain Conservation Plan (CPCP), which will provide significant environmental benefits and contribute the health and wellbeing of the future community through proximity to, and visual access of, natural, green areas. This area has not been included in the quantity of open space assessed, however there is potential to investigate managed access to the CPCP area to provide additional recreational opportunities and benefits to the incoming population and broader community.

### Other considerations for planning social infrastructure and open space

As the site is in a growth area, the identification of locations for social infrastructure and open space for the site should be coordinated across both the Appin and North Appin Precinct and consider the recommended provision made in other planning proposals relevant to the area. The purpose of this coordination is to ensure consistency, avoid duplication and gaps and ensure needs of the community for are adequately addressed in a timely manner.

Due to the scale of the development and projected population, this assessment has focused on addressing district and local social infrastructure and open space needs. The population will however contribute to demand generated for regional infrastructure by broader population growth in the region (e.g. for hospitals, tertiary education facilities, aquatic facilities, museums and galleries). It is expected these needs will be considered and planned at an LGA and regional level and will be met through expansions to existing and new infrastructure in key urban centres, including Campbelltown and Wilton.

# APPENDICES



# A. OPEN SPACE HIERARCHY

The following hierarchy has been used in this open space assessment. This hierarchy is largely based on the draft Greener Places Design Guide.

An additional open space classification (linear open space) has been developed to reflect the significant natural assets which must be retained as part of planning for the North Appin Precincts, and which have an ability to support unstructured recreation uses.

Table 8 Detailed open space hierarchy

Regional	Size	Catchment
<p>Key destination open space areas that typically serve one or more LGAs or districts. Users to regional open spaces are generally prepared to travel significant distances to access the space.</p> <p>Regional parks typically contain drawcard recreational facilities that can support multiple groups at once and are unlikely to be found in other parks in the local area (e.g. multiple sports ovals, large playspaces, BMX tracks). Regional parks contain a range of supporting amenities (e.g. toilets, BBQ facilities, carparking, kiosks) to enable people to stay all day.</p>	Greater than 5 ha	Up to 30 minutes travel time on public transport or by vehicle to regional open space
District		
<p>Serve a catchment of multiple suburbs and communities. District parks serve a diverse user group and can support different recreation uses, from structured play to larger community gatherings. Sportsfields are generally classified as district facilities.</p> <p>District parks typically integrate two or more key recreational facilities (e.g. sportsfields with trails) and supporting amenities (e.g. toilets, carparking) to support group play or large gatherings.</p>	2 – 5 ha	Approximately 2km from most houses
Local		
<p>Serve the local community and located in residential areas. Local parks typically support small group or individual recreation needs and provide respite from the urban environment.</p> <p>Local parks typically integrate one to two small scale recreational facilities such as seating, playspaces, gardens or outdoor exercise equipment.</p>	0.5 – 2 ha	400m – 500m walking distance from most houses
Linear parks		
<p>Areas of open space which typically act as a connection between parks or natural systems, such as along riparian corridors or bushland conservation. Linear parks are suitable for recreation activities such as walking, outdoor exercise and play.</p> <p>In greenfield areas, the GANSW suggests linear parks provide multiple entry points and minimum 50% road frontage or public space access.</p>	-	-

