

15 December 2022

TfNSW Reference: SYD13/00760/18



Gary Hinder
Senior Planning Officer, Western Parkland City
Department of Planning and Environment
Locked Bag 5022
Parramatta NSW 2124

RE: GILEAD PLANNING PROPOSAL - GILEAD STAGE 2

Dear Mr Hinder

Transport for NSW (TfNSW) appreciates the opportunity to provide comments on the draft planning proposal for Gilead Stage 2 (**Proposal**) as referred to us on the NSW Planning Portal on 21 November 2022. As part of the Technical Assurance Panel (TAP) process, TfNSW has previously provided agency feedback on the Proposal on 11 August 2022.

The Proposal seeks to amend State Environmental Planning Policy (Precincts – Western Parkland City) 2021 (**WPC SEPP**) to establish the appropriate land use zoning and controls over the site. The Proposal has been prepared on the basis that an amendment to the WPC SEPP is used to secure the conservation outcomes and development footprint for Gilead Stage 2 (**Site**).

It is noted that 1,700 residential lots are already approved as part of the Figtree Hill development (Gilead Stage 1). The Proposal aims to yield up to 3,300 additional residential lots and a retail centre of up to 5,200 m² on the site.

Detailed comments on the Proposal are provided at **Attachment A** for the Department of Planning and Environment (**DPE**) consideration.

Thank you for the opportunity to provide comments on the draft planning proposal. Should you have any questions or further enquiries in relation to this matter, Dipen Nathwani would be pleased to take your call on 0418 514 166 or email: development.sydney@transport.nsw.gov.au

Sincerely,

A handwritten signature in black ink that reads "RCumming".

Rachel Cumming
Director Land Use, Greater Sydney

Attachment A – Detailed Comments on Gilead Planning Proposal (Gilead Stage 2)

Section/Page ref	Comment/suggestion
Gilead Planning Proposal – Strategic Transport Review prepared by Pentelic Advisory dated 22 June 2022	<p>The Strategic Transport Review indicates that the Gilead Traffic and Transport Assessment (TTA) will be prepared in the future during the post rezoning master planning phase.</p> <p>TfNSW considers that it is not best practice to defer the assessment of traffic and transport impacts of a Proposal to post rezoning. The deferral of assessment may likely result in rezoning the land for an anticipated yield greater than what can be sustained by the existing and future committed (funded) traffic and transport infrastructure on the surrounding road network.</p> <p>The deferral of traffic and transport assessment for the Proposal would also likely create a precedent for other proponents in the Greater Macarthur Growth Area, as well as Greater Sydney, to seek similar concession for their planning proposals.</p> <p>TfNSW considers that a Transport Management and Accessibility Plan (TMAP) should be prepared, to the requirements and satisfaction of TfNSW, before the finalisation of rezoning. Given that Condition 3 of the Gateway Determination (dated 16 November 2022) stipulates that <i>“The planning proposal must be reported to the Planning Secretary, as Planning Proposal Authority, for a final recommendation 5 months from the date of the Gateway determination”</i>, the proponent is encouraged to urgently commence consultation with TfNSW to finalise scope, traffic modelling assumptions and inputs for the TMAP.</p>
Gilead Planning Proposal – Strategic Transport Review prepared by Pentelic Advisory dated 22 June 2022	<p>TfNSW in partnership with the DPE has completed a strategic network review of the Greater Macarthur Growth Area between Mount Gilead and West Appin. This work has informed the updated Greater Macarthur 2040 Structure Plan which has been publicly released on 21 November 2022. Access to Transport’s strategic model and network review will be agreed with DPE and individual applicants within the growth area, as part of developing more detailed master plans and supporting transport investigations. TfNSW also highlights the continuing importance of identifying and protecting a transit corridor within the Growth Area connecting West Appin and Mount Gilead with the Macarthur-Campbelltown Strategic Centre.</p> <p>The Western Sydney Aerotropolis Master Plan Requirements, prepared by TfNSW and publicly available, should be considered by the future TMAP to guide the master plan development of the Proposal and also the design and function of the transit corridor. Scope of works for the TMAP should be developed in consultation with TfNSW through a co-design process.</p>
Gilead Planning Proposal – Strategic Transport Review prepared by Pentelic Advisory dated 22 June 2022	<p>The TTA is proposed to be undertaken in the future to confirm that all streets and local intersections will operate satisfactorily under the critical peak hour flows.</p> <p>TfNSW considers that the scope of TMAP should also include assessing the operation of northern and southern site access intersections proposed to be delivered with the Figtree Hill development. Any augmentation required to these site access</p>

	intersections would need to be identified and delivered at no cost to the NSW Government as part of the Proposal.
Gilead Planning Proposal – Strategic Transport Review prepared by Pentelic Advisory dated 22 June 2022	<p>It is understood that a section of Medhurst Road near Menangle Creek currently traverses through third party land (33 Medhurst Road, Menangle Park - Lot 2 DP622362). Therefore, there is uncertainty regarding connecting with Medhurst Road as well as delivering any Medhurst Road upgrades to suit development timeframes of the Proposal.</p> <p>Given that the traffic generated by the Proposal relies on the ability to utilise future Medhurst Road connection as the northern site access, it is considered that the TMAP should include a sensitivity analysis to demonstrate what dwelling yield is achievable on the site if the Medhurst Road connection is not able to be achieved in line with development timeframes. The sensitivity analysis should consider the capacity limitations of Appin Road and proposed northern and southern site access intersections within the Figtree Hill development.</p>
Gilead Planning Report prepared by GLN Planning dated 30 September 2022 Figure 7, page 20	<p>The explanatory note states that the draft Structure Plan <i>“Establishes the higher order road network from the northern entrance of the Site with a link out to Appin Road to the east to provide functional transport corridor that can be expanded to the south in the future if warranted.”</i></p> <p>TfNSW highlights that the updated Greater Macarthur 2040 Structure Plan, publicly released on 21 November 2022, shows the ‘indicative transport corridor’ traversing only on a part of the proposed secondary collector road i.e. it does not traverse along the proposed secondary collector road connecting to Appin Road in the east.</p> <p>The explanatory note of the draft Structure Plan, and any other Proposal documents referencing the transport corridor, should be updated accordingly.</p>
Gilead Planning Report prepared by GLN Planning dated 30 September 2022 Figure 7, page 20	<p>The indicative alignment of proposed secondary collector road north of Menangle Creek appears to deviate from the current alignment of Medhurst Road within 33 Medhurst Road, Menangle Park (Lot 2 DP622362). Given that this section of alignment traverses third party land it is unclear whether any consultation has occurred with the adjoining landowner to ascertain whether the proposed realignment of Medhurst Road, including the location of Menangle Creek bridge, is acceptable to all parties.</p> <p>TfNSW understands that a draft planning proposal for 101 & 111 Menangle Road and 33 Medhurst Road, Menangle Park has been lodged with Campbelltown City Council in September 2022. The proposal anticipates rezoning the land to achieve approximately 1,450 residential lots. The planning proposal is yet to be referred to TfNSW for comments by Council.</p> <p>The indicative alignment of proposed secondary collector road (north of Menangle Creek) shown on the structure plan of Gilead Stage 2 will likely impact land proposed for residential development as per the Indicative Layout Plan of 33 Medhurst Road, Menangle Park provided to TfNSW previously as part of the pre-lodgement discussions.</p>
Gilead Planning Report prepared by GLN Planning dated 30 September 2022 Figure 7, page 20	TfNSW notes that the proposed sub-arterial road (secondary collector road) bisects the koala habitat corridor along the Woodhouse Creek and Menangle Creek and raises that satisfactory koala connectivity would be required at these locations to ensure functionality of the koala habitat corridor is maintained.

Gilead Planning Report prepared by GLN Planning dated 30 September 2022 Figure 10, page 40	The updated Greater Macarthur 2040 Structure Plan has been publicly released on 21 November 2022. It is recommended that Figure 10 of the Proposal is updated accordingly.
Gilead Planning Report prepared by GLN Planning dated 30 September 2022 Figure 24, page 72	Figure 24 of the Gilead Planning Report illustrates proposed State infrastructure to be delivered under a planning agreement in support of the Proposal. Given that the traffic and transport impacts of the Proposal are yet to be ascertained by the TMAP in the future, it is unclear on what basis the State infrastructure has been identified to be delivered under a planning agreement.
Gilead Planning Report prepared by GLN Planning dated 30 September 2022 Figure 24, page 72	The Gilead Planning Report states that <i>"In anticipation of progressing the rezoning of the Site, Lendlease has lodged an irrevocable offer to enter into a new Planning Agreement with the Minister for Planning to deliver regional scale public infrastructure on behalf of the State Government for Lendlease's development at Figtree Hill and Gilead. This offer includes provides for the delivery of roads, biodiversity protection works and land for a new school with a combined value of nearly \$224M illustrated in Figure 24."</i> Figure 24 however indicates roadworks costing more than \$224 million. It is therefore unclear which roadworks are proposed to be delivered under the planning agreement.
Gilead Planning Report prepared by GLN Planning dated 30 September 2022 Figure 24, page 72 Gilead and Figtree Hill Estate Employment Assessment: Preliminary Opportunities Report prepared by Macroplan dated June 2022 Section 1.2.2, page 15/16	Figure 24 of the Gilead Planning Report illustrates proposed State infrastructure to be delivered under a planning agreement in support of the Proposal. It is understood that Lendlease proposes to deliver Mount Gilead North Sub-arterial road (\$90.9m) which connects Appin Road (via approved Figtree Hill development) to Medhurst Road (via Menangle Creek crossing). While this proposed sub-arterial road (secondary collector road) may ultimately cater for some external traffic, it is considered that this road would predominantly be used by the future residents of the site and principally function to provide site access to the surrounding road network (Appin Road and Medhurst Road). For instance, the estimated traffic generation from the proposed yield of 3,300 dwellings itself would likely necessitate provision of a 4-lane collector road on the site to cater for development traffic without even considering external traffic. Furthermore, it is unclear whether the full length of proposed sub-arterial road (secondary collector road) connecting Appin Road and Medhurst Road will be constructed upfront. If it is instead proposed to be constructed in stages as per the potential precinct staging indicated in Table 1.1 and Map 1.1 of the Employment Assessment: Preliminary Opportunities Report then it would be constructed principally to provide site access to the surrounding road network and any benefit to external traffic (wider community) will only be realised on completion of the whole development (circa 2032). It is also highlighted that the updated Greater Macarthur 2040 Structure Plan, publicly released on 21 November 2022, shows the 'indicative transport corridor' traversing only on a part of the proposed secondary collector road i.e. it does not traverse along the proposed secondary collector road to Appin Road in the east. Given the above, it is considered that it may not be appropriate to apportion 100% cost of the proposed sub-arterial road (secondary

	collector road) as a State contribution in the planning agreement with the Minister of Planning.
Gilead Planning Report prepared by GLN Planning dated 30 September 2022 Appendix T, Land Use Zoning Map	<p>The Land Use Zoning Map indicates that a small portion of the site having frontage with Hume Motorway is proposed to be zoned for Urban Development (UD). TfNSW advises that access is denied across the common boundary of the site with Hume Motorway.</p> <p>Furthermore, the proposed development should be designed such that road traffic noise from Hume Motorway is mitigated in order to satisfy the requirements under Clause 2.120 of <i>State Environmental Planning Policy (Transport and Infrastructure) 2021</i>.</p>
Gilead Planning Report prepared by GLN Planning dated 30 September 2022 Table 5, page 30 Appendix Y, Focus Area 5.2	<p>The Proposal identifies a small area of land as SP2 Infrastructure which will provide for the crossing of Menangle Creek and will serve as the northern entrance to the Site and public transport route.</p> <p>Following advice from TfNSW during the Technical Assurance Panel (TAP) consultation, Table 5 rightly proposes Council as the nominated acquisition authority for the SP2 Infrastructure in clause 5.1 of the Appendix S.</p> <p>However, this land is still proposed for acquisition by Transport for NSW in Focus Area 5.2 of Appendix Y which should be corrected to nominate Council as the acquisition authority.</p>
Gilead Urban Design Report prepared by Urbis dated 11 November 2022 Figure 12, page 35	<p>The Site Access Analysis (Figure 12) depicts a section of Appin Road as 'Approved Appin Road Upgrade' in orange colour.</p> <p>TfNSW notes that an Addendum Review of Environmental Factors (Addendum REF) is currently on public exhibition until 13 December 2022. The Addendum REF seeks to modify the approved Appin Road Upgrade Project REF to generally facilitate the inclusion of two fauna crossings under Appin Road and fauna fencing on the eastern side of Appin Road.</p>
Gilead Urban Design Report prepared by Urbis dated 11 November 2022 Figure 25 & Figure 26, pages 73-75	<p>TfNSW is supportive of the Access and Movement Strategy (Figure 25) which generally reflects the alignment of indicative transport corridor shown in the updated Greater Macarthur 2040 Structure Plan.</p> <p>TfNSW is also supportive of the Indicative Typical Street Section A-A' – Potential Transport Corridor (Figure 26) which reflects the cross section of the transport corridor (Figure 13) envisaged in the <i>Greater Macarthur 2040: An interim plan for the Greater Macarthur Growth Area (November 2018)</i></p>
Gilead Urban Design Report prepared by Urbis dated 11 November 2022 Figure 27, page 76	<p>TfNSW highlights that Indicative Typical Street Section B-B' - Proposed Secondary Collector (Adjacent to Village Centre, Proposed Sporting Field and School) of Figure 27 is not accurate given that the indicative potential transport corridor would be adjacent to Village Centre, Proposed Sporting Field and School.</p> <p>The description of Figure 27 should be amended to describe the proposed secondary collector road as being located east of the indicative potential transport corridor entry into the site from the south.</p>

<p>Gilead Planning Report prepared by GLN Planning dated 30 September 2022 Appendix S, WPD SEPP Amendments Part 4: Principal development standards</p>	<p>TfNSW is supportive of Part 4: Principal development standards, Section 4.3A – Residential density which would restrict granting development consent to development that results in more than 3,300 dwellings on the Site.</p> <p>However, TfNSW raises concern with the flexibility offered in Section 4.6 – Exceptions to development standards which could be potentially used in the future to justify increase in the development yield without corresponding provision/augmentation of road infrastructure. TfNSW recommends DPE to consider including Section 4.3A – Residential density under Section 4.6(8) to cap the maximum yield of the Site at 3,300 dwellings.</p>
<p>General</p>	<p>TfNSW is currently preparing strategic designs for Spring Farm Parkway Stage 2 and Menangle Road Upgrade project. There is currently no NSW Government funding commitment to deliver these projects. These projects are therefore being currently planned for construction in 2036 which would not align with the development timeframes of Gilead Stage 2.</p> <p>The development traffic from the site utilising the proposed northern site access via Medhurst Road is therefore anticipated to adversely affect the safety, efficiency and ongoing operation of Menangle Road. It is also anticipated that development traffic generated by Gilead Stage 2 would warrant upgrade of the existing priority-controlled intersection of Menangle Road and Medhurst Road.</p>