

Adrian Hohenzollern
Department of Planning and Environment

16 December 2022

Adrian

Dear Mr ~~Hohenzollern~~,

COUNCIL SUBMISSION ON APPIN (PART) PRECINCT PLANNING PROPOSAL

Wollondilly Council is writing in response to the recent announcement and exhibition of the State led planning proposal for *Appin (Part) Precinct* lodged by Walker Corporation Pty Ltd.

Council objects to the accelerated rezoning of Greater Macarthur and the proposed for 12,000+ homes currently on exhibition.

The rezoning

- is not consistent with Wollondilly 2040
- will impact the timely delivery of critical infrastructure needed for Wilton
- and has been planned and progressed without consultation with the elected Council and the Wollondilly Community.

It is acknowledged that the rezoning will proceed despite Councils objection and concerns with the acceleration.

With this in mind it is critical that the right planning framework and infrastructure is provided to support the existing and incoming community.

Infrastructure such as connecting roads, public transport, active transport, access to schools, jobs and health services are critical factors to the success of any community.

Planning for significant communities and infrastructure takes time, if done well. The process that the current planning proposal is following is

a) rushed, and

b) does not follow DPE prepared guidelines for planning proposals including the need to align infrastructure planning with the planning proposal and not defer such critical matters until after the rezoning of land.

A council led planning proposal would not be able to proceed in the same situation and context until those critical matters are addressed in line with the State guidelines.

The approach to this submission is therefore tailored to express those infrastructure needs that must be provided within the development both by the developer and the State Government and matters that need to be addressed prior to rezoning and development applications. This includes:

- A connected road network including the need for a new link between Appin and Wilton, direct connection to the Hume Highway and Appin Road upgrade to Campbelltown and the Illawarra. This must be delivered early.
- Acceleration of the Outer Sydney Orbital Stage 2 (OSO2) and connections back to Wilton.
- Public transport corridors with rapid bus connecting to rail, providing real options to the new community to connect into the existing public transport network.
- Provision of active transport links across the entire development including strategic active transport corridors.
- Early planning and delivery of schools and health services.
- Integrated water and wastewater management, including planning and a commitment to service growth from Sydney Water, with short medium- and long-term funded commitments.
- High quality, accessible, connected and diverse open space to support the current and future population.
- Effective conservation and management of natural vegetation, and recognition of the critical place making role it plays in planning for new communities.
- No net loss to areas identified for conservation in the Cumberland Plain Conservation Plan.
- Agreed measures to protect established wild life corridors, including koala habitat and how these will be implemented in an urban landscape.
- A plan to rezone of land for employment uses to support local jobs.
- Protection of Appin village from negative impacts of development.
- Finalisation of a Contributions Plan for Appin.
- Finalisation of a Development Control Plan (DCP) based on Wilton DCP as a minimum.
- Confirmation that the Greater Macarthur Draft SIC will be finalized and that the State Government will cover the remaining gap.

1. Wollondilly Local Strategic Planning Statement

The Wollondilly Local Strategic Planning Statement provides Council's position on Greater Macarthur. Without the early identification, planning for and commitment to infrastructure in Appin, any planning proposal is inappropriate. The LSPS *Planning Priority 3 - Establishing a framework for sustainable managed growth*, specifically calls out the OSO2. The need for such critical infrastructure is the reason that Council sees Appin as long-term prospect and continues to advocate for Wilton as the priority growth area. We will continue to work with the NSW Government to undertake long term planning and further studies to secure commitment for investment in critical infrastructure and sustainable outcomes however this certainty is needed prior to the roll out of housing.

The LSPS also identifies *Planning Priority 8 - Enhancing vibrant, healthy and sustainable local towns and villages*, which sets a good basis for the types of communities that Council is striving to deliver. These priorities will impact both the planning proposal, the development control plan and the contribution plan.

2. Critical Road Links

The current road network within Appin is minimal and currently the community experiences challenges when Appin Road (between Appin and Campbelltown) and Appin/Bulli Road is closed due to an accident. Similarly, Appin Road to Wollongong in summer creates extensive delays into and out of the town.

Significant investment will need to occur on existing roads to support the expected 16,000 homes in Appin inclusive of the 12,000 to be delivered in this planning proposal.

A new road network will also be needed to support the residents, this road network will need to support more than just cars, it will need to be capable of effectively and efficiently moving buses as well as providing active transport links.

The road network will need to provide perimeter road arrangements as buffers to conservation lands and as part of the APZ. Roads should not be allowed to encroach on or erode the current boundary of environmental lands identified in the CPCP. The road network should also support linkages between the new communities of Wilton and Appin.

It would appear that the planning proposal uses 2016 traffic and transport data from Census. Older data will impact the results for the precinct, new developments have been established since 2016 – including Appin Valley.

3. The Outer Sydney Orbital

The planning proposal includes a new alignment for the OSO2, the new alignment proposes a connection from the Hume, through Appin and out towards Wilton ultimately onto Picton Road.

It is critical that the two communities of Wilton and Appin be connected via road that facilitates public transport. Wilton has 15,000 homes planned a further 16,000 homes now planned for Appin under the structure plan. Council needs assurance that the new communities will not be left to rely on Broughton Pass, with its limitations, to access the rest of the Shire. The connections must be delivered short term.

There is potential for OSO2 to connect the two new communities. This connection is needed and supported. Importantly, this connection cannot wait 20 years to be delivered. The accelerated planning and delivery of the OSO2 must be a government priority as part of the delivery of the new homes. Housing cannot and should not be delivered in isolation of key connecting roads.

The planning for the OSO2 and its links to Wilton will need to carefully consider how the connection between the two communities will function, the access points onto the local road network, road widths and volumes and public transport. It will need to be socialised and Council needs to be part of the design process.

4. Education Facilities

There is currently only one primary school in the area being Appin Public School and it only has approximately 316 students and is not equipped to support growth in population. The area is currently not serviced by a high school with the closest being Ambervale High School in Campbelltown. It will be critical that land for schools is secured early and that Education be planning for the delivery of at least a K-12 in the early stage of development.

5. Employment Opportunities

Local employment opportunities need to be prioritised, while Wilton has a state set target of 15,000 jobs only land for housing has been prioritised. It would appear that Appin is following a similar path, where housing is prioritised over employment generating land and the employment land is left to Council resolve and progress.

Centres can create some job opportunities but it is simply not enough for the incoming population.

It is recommended that there be a planning pathway established for employment areas that does not simply defer the role to Council.

It is also recommended that links be established early between Appin and the potential employment area identified in the structure plan at Morton Park Road which is expected to deliver around 10,000 jobs. Currently there appear to be no connection between these sites. Without the connections to jobs employed residents will have to travel to neighbouring Council area, consequently leading to very low employment self-sufficiency and employment self-containment.

6. Centres

The supporting retail and employment study indicate that Appin and North Appin precincts will have 21,000 residential dwellings and will be supported by a local centre and five neighbourhood centres.

It is understood that the Local Centre will have 30,000m² of retail and ancillary non-retail floorspace, providing 1,217 jobs; Neighbourhood Centres will have 17,500m² floor space providing 770 jobs.

Lack of essential services within the walkable catchment could lead residents to rely on motorised vehicles for shopping. This would not lead to acceptable outcomes, more work is needed to support local jobs and ensuring that the centres cater to the needs of the community.

It is recommended that the location of future centres needs to be of sufficient distance to not detract from the viability of the existing centre in Appin. Lastly any future centres should not detract from Wilton Town Centre and residents should be provided with links back to Wilton to utilise the higher order services.

7. Health Services and Social Infrastructure

Prior to finalisation of the planning proposal, the proponent must demonstrate that sufficient land will be allocated to allow delivery of primary health care facilities to bring Wollondilly in line with the NSW average per capita provision. Further clarity must also be provided on the suggested shared service model, particularly in terms of how land will be allocated for shared service facilities, what proportion of primary health care facilities will be shared (versus single-purpose health premises) and how construction, management and the ongoing maintenance of these facilities is likely to be funded.

The Social Infrastructure and Open Space Assessment uses data from the superseded Wollondilly Health Needs Assessment 2014; prior to finalisation of the planning proposal, the Assessment should be updated for consistency with Wollondilly Health Needs Review 2020.

<https://www.wollondilly.nsw.gov.au/assets/Uploads/FINAL-2020-Wollondilly-Needs-Assessment-v1.3-2020.10.28.pdf>

In relation to the shared service model identified in the reports there are some concerns that warrant further discussion, these include:

- Model creates confusion over funding responsibilities, and this should be resolved prior to any commitment to rezone the land
- Burden for providing spaces and services (and maintaining spaces) likely falls to Council and/or SWSLHD, and document does not indicate that discussions with SWSLHD are sufficiently advanced to guarantee early supply; more detail is needed

- Wollondilly has an existing shortfall in GP and primary health services, so Appin would need to provide extra in order to tackle this shortfall, but the numbers appear to simply track with the existing provision (this is hard to calculate based on the information provided, so a better explanation of how these numbers have been arrived at would be useful)

In relation to open space, Figure 13 Indicative distribution of open space some District Open Space, overlaps with riparian corridors and places with identified First Nations cultural values; some of this land may not be accessible for recreational purposes, so care must be taken to ensure that the available land set aside for open space meets the quantitative or performance requirements.

At minimum, the Social Infrastructure and Open Space Assessment should be consistent with the *Healthy Built Environment Checklist* Part 4, 08 Social Infrastructure.

The assessment and the planning proposal appear to be inconsistent with the following questions in the Checklist insofar as they appear to be silent on early delivery and land dedication.

- *Early delivery*: Are mechanisms in place to ensure early provision of social infrastructure? Do these mechanisms include funding strategies to ensure that social infrastructure is available from the earliest possible stages of planned use and/or settlement?
- *Dedicated land*: Has land been dedicated for the provision of social infrastructure? Is this land centrally located and easily accessible?

8. Social Impact

The proponent has provided a Social and Health Impact Comment (SHIC), which under Council's Guidelines is the lower tier of Social and Health Impact Assessment. The requirement for the proponent should be a Comprehensive Social and Health Impact Report, as per the guideline. It is recommended that the DPE require this prior to finalisation of the planning proposal, and make appropriate changes to the proposal.

To ensure that health and wellbeing are given sufficient consideration in the preparation of structure plans, DCPs and DAs, it is further recommended that the planning proposal include an aim or objective in the relevant section of the SEPP for the Precinct Plan as follows: *to provide for a built environment that promotes and prioritises equity and the health and wellbeing of residents, workers and visitors.*

9. Impacts on Wilton

Council is facing a number of the challenges in Wilton relating to servicing, the impacts of development on the road network and the lag between housing and the planned delivery of critical road links. The rezoning of further land in Appin for

16,000 homes is very likely to further disperse State Government investment in water, waste water, roads and public transport.

It is a great concern to Council that development in Appin will detract from investment in Wilton, development in Appin cannot be at the expense of prioritising the delivery of critical services to Wilton which is already zoned and has active development applications.

Without any additional funding source for each agency, the immediate impacts on the delivery of necessary infrastructure to support more housing will be to the detriment of Wilton and the Wollondilly community.

10. Water and Waste Water Services

Plans to secure reliable water and waste water services will be needed to support Appin. A clear plan by Sydney Water that demonstrates that housing will be serviced is to be released at the same time or shortly after rezoning for additional homes. This must occur before development applications are received for housing.

Council is currently faced with the challenge of limited capacity in Wilton and the pressure of having to assess neighbourhood plans and development applications with a lack of a publicly announced long term solution to service beyond the first few thousand homes.

11. Water Cycle Management

It is noted that the End of Pipe Solutions for water management proposed with the planning proposal is inconsistent with Councils Integrated Water Management Strategy.

Wollondilly's Integrated Management Policy, Strategy and WSUD Guidelines has a defined outcome of zero impact to watercourses. The proposal must have demonstrated consistency with this outcome.

These documents seek to protect waterway health and ensuring the whole of the water cycle (including stormwater, wastewater and potable water) is managed to support the following:

- community liveability, greener neighbourhoods, recreation and amenity
- mitigating heat island effect
- local biodiversity
- water conservation, water reuse and recycling
- local industries including agriculture and other high-water users to promote local jobs
- climate change mitigation and resilience

12. CPCP, Koalas and Wildlife Impacts

The CPCP was conferred by the State but is still awaiting approval by the Federal Government. Ideally the CPCP would be approved by all levels of Government prior to rezoning of land to ensure that appropriate approvals are in place prior to development.

Council does not support the further erosion of vegetation associated with the Cumberland Plain. It is noted that the proponent is seeking as part of the planning proposal to alter the boundary of the CPCP to accommodate a perimeter road.

It is recommended that firm approach be applied to avoid further impacts on land within the CPCP. Development including local roads cannot be at the expense of land identified in CPCP for conservation. If adjustments are made it should be at no net loss of CPCP vegetation. In this instance, the proposed changes to CPCP could be avoided by shifting the new road away from the CPCP land to ensure a workable alignment rather than encroach on and further erode CPCP vegetation.

Roads and other infrastructure should allow for wildlife, other koalas, to move freely without being “trapped” in urban environments.

Roads such as Appin Road should be upgraded with wildlife friendly crossings.

The CPCP should generally have perimeter roads and other uses such as open space or playing fields should not encroach on the CPCP land. These uses can introduce other conflicts and edge effects that may be undesirable.

It is noted that any infrastructure that does need to traverse land that is not certified will need separate approval and offsets.

Koala corridors need to meet the minimum 390m width as per the Chief Scientists report additionally any Endangered Ecological Communities present within the development footprint are to be preserved and enhanced.

It is recommended that the Department consider what mechanisms can be used to ensure that there is sufficient communications and education on environmental values of the area. This should be led by the developed with new land purchasers provide with materials that assist in understanding the values of local biodiversity, waterways, local indigenous culture, climate resilience and sustainability.

Developers in such sensitive environments need to play a role in community education, awareness and setting up community resources as part of the development which are critical to the ongoing management of the local environment.

13. Sustainability

Mixed-use walkable neighbourhoods, highly serviced by public transport are the best way to meet sustainable development goals. Car-based developments have detrimental effects on resident health, carbon emissions, natural systems and food supply.

The sustainable and resilient development options proposed are supported, as a bare minimum for implementation in Greater Macarthur. Enhancement of sustainability measures should be explored including:

- Elevating the importance of water being held in the landscape to reduce unwanted urban heat, and to assist in the delivery and sustainability of all green infrastructure, and improved resilience levels
- Increased permeable surfaces
- Active transport and public transport networks that link to jobs and services should be prioritised, with early delivery to optimise take-up
- Low embodied-carbon material should be prioritised for all infrastructure and built environs
- Fossil-fuel use should be minimised including the elimination of gas delivered to the development. All electric suburbs, with onsite renewables and storage, including community batteries as resilience measures
- Strategies to eliminate waste should be developed, for construction and ongoing use.
- Electric vehicle use should be encouraged, with early infrastructure needs considered and implemented, including for E-bikes
- Education programs should be a part of early development, to encourage energy efficient housing, resilient landscape, active and public transport, biodiversity values.

The use of WSROC Urban Heat Planning Toolkit and the Cool Suburbs tool to mitigate the negative effects of urban heat is supported. The complete set of recommendations of the Urban Heat Assessment report should be incorporated into the DCP with an overarching objective that supports sustainability included in the SEPP.

14. Public Transport

Any new development in Appin needs to be well connected and supported by public transport. Currently there are limited services between Campbelltown and Wollongong and there are no services connecting Appin to the rest of Wollondilly.

Services should be planned and delivered early and must provide viable and efficient connection to rail in Campbelltown and ideally include connection to Wollondilly such as Menangle/Douglas Park train station.

The key spine road that proposes rapid bus should be an early commitment by the State Government or delivered by developers to ensure the communities are supported with accessible public transport.

Public transport links will also be required to connect Appin with Wilton. Wollondilly cannot have two growth areas that have no meaningful connections between the

two significant towns. Appin residents will need access to the strategic centre in Wilton.

15. Active Transport

Sustainable communities require development to consider all users including those without access to cars. Active transport within local development is important but also within the regional and state road networks to support walking between home and points of interest or to access public transport and for exercise.

Strategic active transport corridors that leverage of the road network can provide opportunity for electric bike and support opportunities for exercise within dedicated safe spaces. There are excellent opportunities to link Appin through to Wilton as part of the planning of strategic active transport links. The Department need to be doing more to communicate with whole of Government to ensure that they understand what they need to be factoring in when planning for growth.

This requires new development consider *Healthy Streets* principles. The DCP should provide for wider paths that accommodate more users or users that need more space, paths should be provided on both sides of the road to avoid unnecessary/forced crossing, particularly important for children, prams and people with mobility limitations. Ramps should be on desire lines, there should opportunities for rest, access to water and a general prioritisation of people rather than cars on local streets.

It is recommended that the network planning include active transport, public transport and road connections including timing

- between neighbourhoods
- via and adjacent to the OSO
- to Wilton growth area
- to Douglas Park Station
- to Menangle (including the potential employment lands at Moreton Park road
- to Camden, and Macarthur

16. Bushfire

It is recommended that there is significant engagement undertaken with RFS to ensure the strategic bushfire work undertaken is sufficient and that RFS is comfortable with the approach applied to deal with emergencies.

Appin has significant strands of vegetations and the needs to be ready and responsive. Significant work has had to be completed post rezoning and even held up development applications because the work that was undertaken for Wilton was not considered appropriate from a safety and evacuation perspective.

17. Infrastructure Contributions

The November 2022 Structure Plan updates some important spatial planning decisions, such as the CPCP, OSO2, Aboriginal Cultural heritage and local centres, however it also lacks definition in immediate regional transport connects.

Suggestions of “future” connections demonstrates that the rezoning process is being expediated without the mechanisms that could secure infrastructure funding and delivery. The State Governments decision to rezone and defer this significant issue which is then left to Council to resolve without any ability to negotiate because the rezoning has been completed and commitments agreed or made through the planning process. This is unacceptable to Council.

a. VPAs

Published work points to Government unwilling to fulfil its statutory duties and follow its own guidelines for planning proposals, or to make infrastructure plans afforded under legislation, by acquiescing to voluntary planning agreements (VPAs) before there is an infrastructure plan in place to guide an already opaque negotiated process.

Proposing to deliver infrastructure to support the growth of a planned precinct through site specific VPAs is unfortunately retrofitting, rather than strategic planning. This is at the cost of Government, Council and most importantly, the Community.

Rezoning processes must not proceed until there is a comprehensive Greater Macarthur Contributions Plan and a fully funded SIC has been made.

The proposal notes the provision of 5% affordable housing within medium density stock to be secured through a planning agreement. While Council supports the provision of affordable housing it is noted that a) it is unclear who the planning agreement is with, and b) how it will be managed. It is recommended that the agreement should be with the State Government as Council is not an affordable housing supplier or manager.

b. Contributions Plan

Clause 66(c) of the Environmental Planning and Assessment Regulation 2021 requires a Contributions Plan (CP) to be made before development applications can be determined. There is no contributions plan in place for Great Macarthur growth area development as a planned precinct.

A Local Infrastructure Contributions Plan must be made before VPAs can be entered into, noting that VPAs are simply a delivery mechanism of Council's plan.

Appin has a \$20,000 Contributions Cap, which makes funding Local Infrastructure much more challenging, given the cost of infrastructure is likely to exceed the cap. Council may seek IPART approval for a contribution above the cap, but the community is penalised by having to withdraw all community facility buildings from developer contributions.

For the Government to give Council even minimal assistance, the State needs to make the Greater Macarthur SIC now.

In this regard, the previous submission made by Council on the Draft SIC, which highlights a significant funding gap and deficient stands. No formal response or plan to address the significant funding and delivery shortfall has been provided.

c. Infrastructure Delivery Plan

The report needs to be updated to reflect changes in the new GM structure plan.

It is recommended at a minimum that the Infrastructure Schedules be based on the outcomes of technical reports, individually itemised and fully costs (both land and works).

d. Infrastructure Phasing Report

The report needs to be updated to reflect changes in the new GM structure plan.

It is recommended that infrastructure delivery timing to be associated to lot thresholds rather than broad estimated dates or stages based on land ownership. Development will occur where private enterprise can secure and fund critical led-in infrastructure.

e. Social Infrastructure and Open Space Report

A set of open space provision rates benchmarks deviate from standard Growth Area rate of 2.83 ha / 1000 people. While consideration of different ideas is not discouraged, the current Planning Minister revoked the planning principles that would permit consideration of alternates. Practically, the alternate measure would increase developer contributions over the Cap (which cannot be recouped) and increase Council lifecycle costs.

Plans for open space and community facilities need to be updated to acknowledge the existing community's infrastructure demand and actual linkages to existing facilities and assets.

It is recommended the report be updated to reflect changes in the new GM structure plan.

18. Planning Mechanisms

The current process being followed by DPE to rezone on developer led land leaves many smaller land holdings with no planning pathway forward, similar to the unincorporated lands contained within South East Wilton Precinct. These landowners do not have resources to prepare a planning proposal to rezone their land or access to agencies in the way that Walker had access to Government. This is unfortunately not equitable nor transparent.

The process is long, complex and costly and these landowners are the ones left behind. It is recommended that DPE provide a pathway and support for these

landowners to allow them to move on should they wish, particularly as land around them transitions to urban uses.

In regard to the relationship of the planning proposal and other legislation, the application of the existing greenfield housing code is not supported. The environment is too sensitive to have this type of development rolled out. This is discussed in more detail under point 17(d) of this submission.

It is recommended that specific consultations with agencies including consult with GCC be included with an opportunity for Council to review submissions to ensure that the issues can be addressed early, as the development applications will be the responsibility of Council.

Under the EP&A Act, there are specific consultation requirements that must be carried out by the Department. In this regard, it is noted that Special consultation under section 3.25 has not been carried out with the Chief Executive of OEH, nor with the Secretary of Department of Industry Skills and Regional Development in relation to fish and marine vegetation.

Further we would encourage the Department to reconsider the planning proposal consistency with section 3.33 of the Act, and specifically whether the proposal is consistent with the relevant Ministerial Directions and Councils local strategic planning statement. This submission highlights that the current proposal is not consistent.

a. Structure Plan and Precinct Plans

The Precinct Plans provided are not detailed enough when combined with the application of the UDZ. Detailed master planning needs to occur prior to rezoning. Land uses need to be identified on the precinct structure plan including the extent of low and medium density housing, potential school sites, local or neighbourhood centres (extent not just a dot). The information is required so that Council is not left to resolve these matters in a process similar to Neighbourhood Plan. This would add time and resources that are simply not available. It is recommended that this detail be developed as part of the planning proposal.

It is recommended that easements are identified on the structure plan separately as they pose different risks i.e. distinguish HPGTP from the electricity easement.

It is recommended that schools be identified on the Structure and Precinct Plans noting that 7ha of land identified. More information needed on type and location on the mapping provided.

As a comment on the material exhibited, it was difficult to distinguish between the Appin (Part) Precinct (versions 1 and 2) and the broader Appin Precinct and North Appin Precinct.

It is also noted that road connections are inconsistent with the November 2022 Greater Mac Update released by DPE. This should be clarified and updated.

While the 20-minute neighbourhoods are supported, it is noted that not all residential areas are within 20 minutes of the proposed centres.

Affordable housing provision is supported in principal. Council seeks clarification on whether this should include 5% across all housing types to ensure diversity and options for different household i.e. low and medium density housing. It is noted that any affordable housing also needs to be appropriately located near services.

Council seeks to understand if this process is intended to also formalise the broader Precinct Structure Plans for Appin and North Appin. If so, we recommend further work be undertaken including consultation to ensure well-planned, linked, orderly and equitable development across the broad area.

b. SEPP

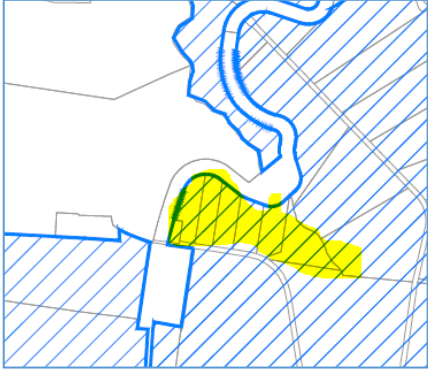
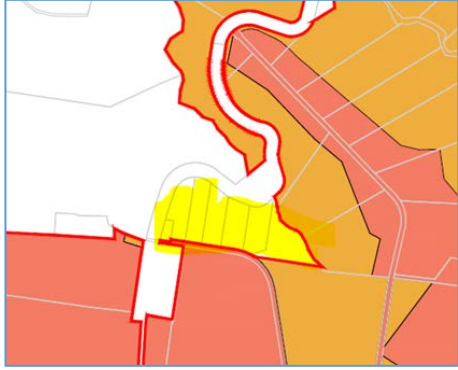
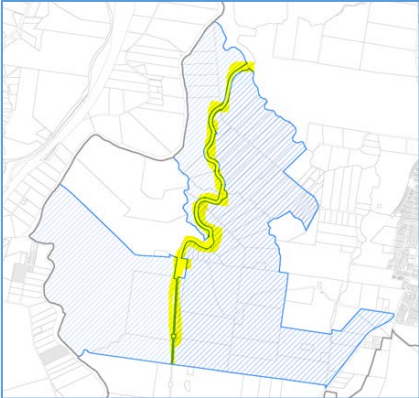
A dwelling cap is not supported as it relies on Council to manage and the individual land owners not to intensify, is limiting, difficult to enforces given land use permissibility and challenging to manage.

It is recommended that the SEPP include objectives that support the following in Greater Macarthur Appin:

- Active transport
- Sustainable development
- Integrated water management
- Health and Wellbeing including healthy streets
- Preservations of vegetation and koala habitat.

c. Maps

Density provisions in the DCP are not an appropriate mechanism to enforce density in conjunction with a UDZ. Council recommends the use of minimum lot size mapping that supported by the Precinct Plan that indicates areas of medium and low density residential. The following table sets out mapping issues.

Map	Included	Comments/Recommendations
Land Application	Yes	<p data-bbox="613 347 2116 408">Discrepancy between LAM and other zoning maps. This would create unzoned land as it would be removed from LEP but not replaced under SEPP. Recommend this be addressed/fixed.</p> <div data-bbox="732 427 1158 798">  </div> <div data-bbox="1507 427 1962 798">  </div> <p data-bbox="613 818 2018 879">It is also recommended that some of the Upper Canal Corridor be transferred into the SEPP to minimize any cadastre issues.</p> <p data-bbox="613 900 2078 960">It cuts through the site, and if left in the WLEP it would creating an irregular Land Application boundary. Currently zoned SP2 and heritage listed under the WLEP.</p> <div data-bbox="1158 984 1574 1383">  </div>

Land Use Zone	Yes	Zones used include UDZ, SP2 and C2. Any changes to CPCP boundary would need to demonstrate not net loss or cannot be supported.
Minimum Lot Size	Yes	The maps show 40ha for C2 only. It is recommended that minimum lot size map should be used to determine lot size to allow flexibility in lot outcome, preferred over density banding and allows for clear application of controls in SEPP.
Heritage	Yes	Includes local items and proposed state items. May need to be refined when state listing is finalised.
Height of building	No	Recommend a height of building map be introduced via a SEPP map or included in the structure plan. Appropriate heights to be selected based on proposed land use and landscape sensitivities.
Additional Permitted Uses	Yes	Relates to the easements within the environmental land. Recommend that clarity is provided on the proposed additional permitted uses as it is currently unclear.
Urban Release Area	No	This should link to satisfactory arrangement or similar as in the Wilton Growth Area and other release areas
Sequencing Development	Yes	In lieu of clear infrastructure funding, a mechanism needs to be included.
Clause Application	Yes	Relates to Koala Corridors – Nepean River and Corridor E

d. DCP

Council supports a DCP being made prior to development. Any loophole that allows a development application to rely on a draft/exhibited DCP should be avoided. Wording should reinforce the need for a DCP to be “made” or “finalised”.

The DCP that applies to Appin should at a minimum be based on the Wilton DCP which is supported by a CDC that carefully considers how to development can deliver 40% tree canopy, increase pervious surfaces within development, facilitate on-street parking, WSUD infrastructure, paths, street furniture, service and lighting.

Once rezoned Council expects that development will be respectful of the current environment and its condition. This includes the following measures:

- Adopting the approach of the Integrated Water Management Strategy
- Provide controls that maximise synergies between landscaping plans and stormwater/wastewater management plans
- Provide alignment of the Blue and Green Grids
- Provide controls that seek natural water balances for the site including minimising changes to natural drainage lines and topography to reduce alteration and other negative impacts to sensitive environmental receivers
- Providing smart infrastructure
- Controls for the layout and design that is sensitive to native wildlife movements and behaviour and are to include:
 - Clear wildlife corridor linkages including East-West corridor linkages
 - Preserve established mature trees and local native vegetation stands within the development
 - Diverse locally native planting palette used in landscaping
 - Road layout, culverts, bridges and other traffic management options designed to prevent road strike but also allow movement of wildlife between habitat locations
- Inclusion of Healthy Streets principles
- Providing a well-connected active transport network within streets and through natural areas linking to key public transport corridors including active transport to rail
- Provide a road network that supports efficient bus movement

- Provide a clear plan for easements within the development
- Support substantial sustainability measures within the development including those outlined on page 67 “*Potential Sustainability Opportunities*”

Closing remarks

Council at its meeting on 13 December 2023, resolved to endorse this submission as well as the staff participation in the Project Control Group that is being established by the Department of Planning and Environment. It also calls on the Department to provide the community with an extension for community submission until February 2023.

In addition to the points in the letter, the minutes highlight the need for:

- Neighbourhood Plans or a similar planning process be adopted to ensure that the Council staff and the Councillors have input into the structure plan and/or master plan process.
- Future DCP controls that relate to domestic pets, koala fencing and appropriate safeguards for koalas and wildlife.
- Public transit corridors extended through the entire growth corridor to include Wilton.
- Possible upgrades to a metro rail line in the long term.
- Provision of employment lands.
- Staging and Sequencing Plan linked to lot yield for both local and state infrastructure.
- Comprehensively address fragmented land ownership.
- An early connection between Wilton and Appin.

A copy of the minutes has been included with this letter. We welcome the opportunity to work through these issues further with both the proponent and the Department.

Yours faithfully,



Stephen Gardiner
Manager Sustainable Growth
Shire Futures

EXTENSION TO SPEECHES

RESOLUTION 348/2022

Moved: Cr Suzy Brandstater

Seconded: Cr Judith Hannan

That Councillor Deeth be allowed to speak for an additional three minutes.

On being put to the meeting the motion was declared **CARRIED 9/0**

In Favour: Crs Michael Banasik, Suzy Brandstater, Blair Briggs, Matthew Deeth, Hilton Gibbs, Matthew Gould, Judith Hannan, Paul Rogers and Beverley Spearpoint

Against: Nil

RESOLUTION 349/2022

Moved: Cr Judith Hannan

Seconded: Cr Paul Rogers

That Councillor Gould be allowed to speak for an additional three minutes.

On being put to the meeting the motion was declared **CARRIED 9/0**

In Favour: Crs Michael Banasik, Suzy Brandstater, Blair Briggs, Matthew Deeth, Hilton Gibbs, Matthew Gould, Judith Hannan, Paul Rogers and Beverley Spearpoint

Against: Nil

RESOLUTION 350/2022

Moved: Cr Matthew Deeth

Seconded: Cr Michael Banasik

That Council:

1. **Endorse the draft submission on the Appin (Part) Precinct Planning Proposal.**
2. **Endorse staff participation in the Project Control Group being established by the Department of Planning and Environment for the Greater Macarthur Growth Area.**
3. ***Request the Department of Planning and Environment instigate neighbourhood plans for Council to provide input into the process.***
4. ***Request another mechanism or planning process be identified to ensure input from Council staff and the governing body into the structure plan or master planning process should the Department of Planning and Environment not provide a neighbourhood planning process.***
5. ***Request that the Department of Planning and Environment in collaboration with Council develop DCP controls that control domestic pets, koala fencing and appropriate safeguards for Koalas and wildlife crossings.***

6. ***Request the public transit corridor be extended through the entire growth corridor to include servicing Wilton and that it be planned for possible future upgrade to a metro rail line in the long term.***
7. ***Note that the planning proposal should demonstrate the provision of employment independently of other planning proposals.***
8. ***Note that the catalytic infrastructure required to support future employment areas must be committed to by the State Govt prior to being considered for rezoning.***
9. ***Request the Department of Planning and Environment develop and commit to a staging a sequencing plan around lot yield and incorporating both local and state infrastructure delivery.***
10. ***Highlights its concerns with fragmented land ownership and the delivery against the masterplan and that an appropriate mechanism be found to manage total dwelling yields and the thresholds, total infrastructure, staging and sequencing plan must be in place, funded and committed to ensure appropriate infrastructure planning and delivery.***
11. ***Request an early clear connection between Appin and Wilton, with one possible option being a multi-function use of the corridor planned for the OSO2, similar to Mamre Road and M7 parallel corridor to provide local and regional connections between Wilton and Appin.***
12. ***Request the Minister for Planning and Homes provide an extension for the community until February 2023 to provide their submission on the proposal.***

On being put to the meeting the motion was declared **CARRIED 7/2**

In Favour: Crs Michael Banasik, Suzy Brandstater, Blair Briggs, Matthew Deeth, Hilton Gibbs, Matthew Gould and Paul Rogers

Against: Crs Judith Hannan and Beverley Spearpoint