

19 December 2022

Tim Raimond
Deputy Secretary Planning and Land Use Strategy
NSW Department of Planning and Environment
4 Parramatta Square, 12 Darcy Street
PARRAMATTA NSW 2150

Attention: Neala Gautam
Email: neala.gautam@planning.nsw.gov.au

Dear Tim

RE: PLANNING PROPOSAL (PP-2022-3979) TO AMEND STATE ENVIRONMENTAL PLANNING POLICY (PRECINCTS—WESTERN PARKLAND CITY) 2021 (WPC SEPP), TO CONSERVATION PURPOSES, AND ASSOCIATED AMENDMENTS

This submission has been prepared in response to the exhibition of Planning Proposal 2022-3979 (Planning Proposal) to rezone the Appin (Part) Precinct site for urban development and conservation. We commend the Department of Planning and Environment for updating the draft Greater Macarthur Structure Plan which forms the framework for the consideration of the subject Planning Proposal (see Figure 1).



Figure 1. Draft Greater Macarthur Growth Area Structure Plan

1. We support the purpose of the Planning Proposal because it will accelerate the delivery of enabling infrastructure and housing supply in South West Sydney.
2. We are preparing a similar planning proposal for our land within the adjoining North Appin Precinct which will be on exhibition early in 2023 (see Figure 2).



Figure 2. Our draft structure/precinct plan from our Planning Proposal in the North Appin Precinct

3. Due to the advanced stage of the precinct design for our planning proposal we have a detailed understanding of the site's opportunities and constraints. This understanding has informed our assessment of the Planning Proposal.
4. The Planning Proposal includes a plan titled *Appin and North Appin Precincts Indicative Plan* with a road layout that informs the proponent's Traffic Assessment and Bushfire Evacuation Traffic Study, Appin and North Infrastructure Phasing Plan.
5. As identified in Figure 3, the *Appin and North Appin Precincts Indicative Plan* proposes an East-West Link Road that crosses Ousedale Creek at the southwestern boundary of the North Appin Precinct and then traverses across the North Appin precinct before intersecting with Appin Road.

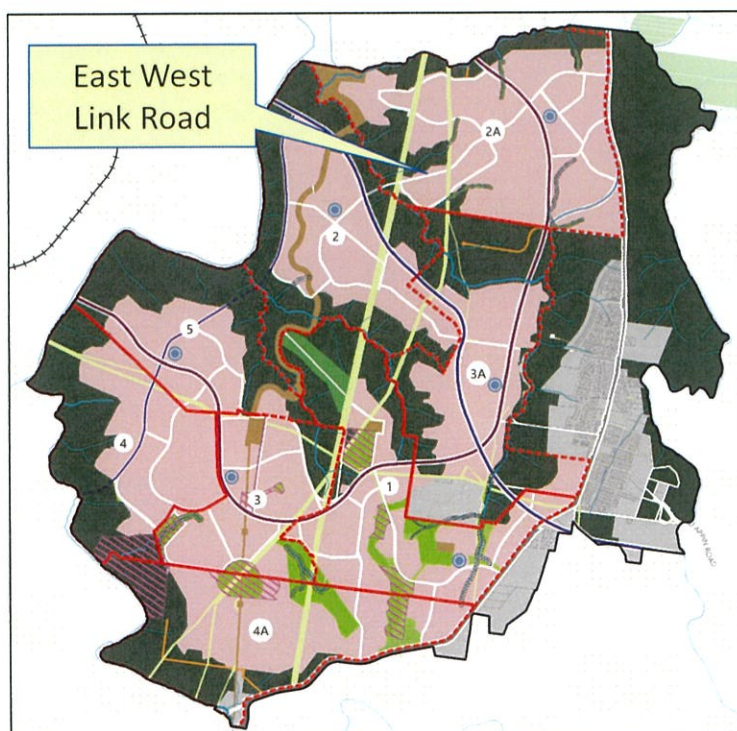


Figure 3. Appin and North Appin Precincts Indicative Plan extract showing the proposed East-West Link Road

6. We object to the East-West Link Road for the following reasons:

- Our design vision for the North Appin Precinct emphasises the creation of discrete neighbourhoods connected to the local terrain with numerous pedestrian and cycling pathways that encourages residents to move freely around the precinct without the need of an automobile. The introduction of an East-West Link Road will force regional through-traffic into the precinct travelling north from the West Appin urban release area towards Campbelltown. This link road will unnecessarily sterilise land and diminish residential amenity in contradiction to planning first principles, our urban design strategy and the Department of Planning and Environment's design guidelines;
- There is no need for an East-West Link Road to service North Appin since traffic volumes can be managed entirely with the duplication of Appin Road to four lanes and the delivery of the planned new Transit Corridor (refer: *North Appin Precinct Master Plan Strategic Transport Assessment: Urbis, December 2022*) that is highlighted in orange in Figures 1 and 2;
- There is no need for the East-West Link Road for northbound traffic from West Appin because this traffic can travel via the proposed *East-West Connection Road* to the Hume Highway; and

- The East-West Link Road will introduce an additional unnecessary and costly crossing of Ousedale Creek which negatively bisects this critical koala corridor. Preservation and enhancement of the Ousedale Creek koala corridor is a key objective in the NSW Government's effort to rezone the Greater Macarthur Growth Area.
7. The Proposal also includes a road across the North Appin precinct titled "Appin Bypass" (see Figure 4).

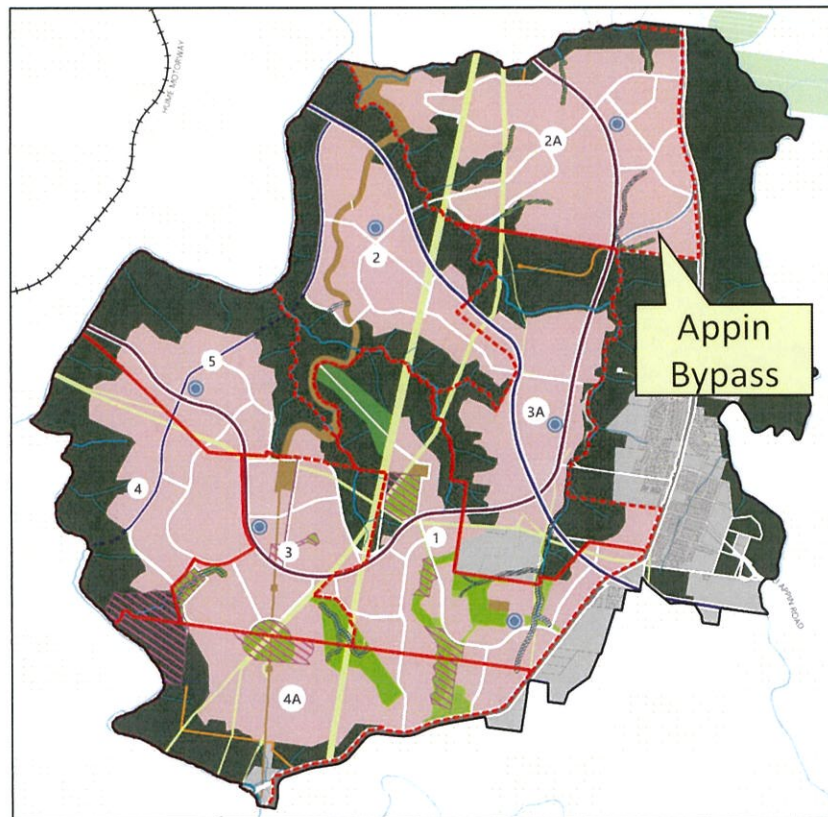


Figure 4. Appin and North Appin Precincts Indicative Plan extract showing the proposed Appin Bypass

8. We object to the proposal to build an Appin Bypass Road through the North Appin precinct for the following reasons:
- The proposed alignment will introduce regional through-traffic into the North Appin precinct contrary to the urban design and place making principles explained above;
 - There is a superior alternate alignment option which involves the use of the existing Brian Road corridor. The superior option avoids unnecessary and expensive land resumption by using the existing (and certain) Brian Road corridor that is already planned for an upgrade at its intersection with Appin Road. This is a faster delivery option which de-risks road transport enabling infrastructure provision. Further, by using the existing Brian Road corridor we avoid further encroachment on the strategically important Ousedale Creek koala corridor (see Figure 5.)

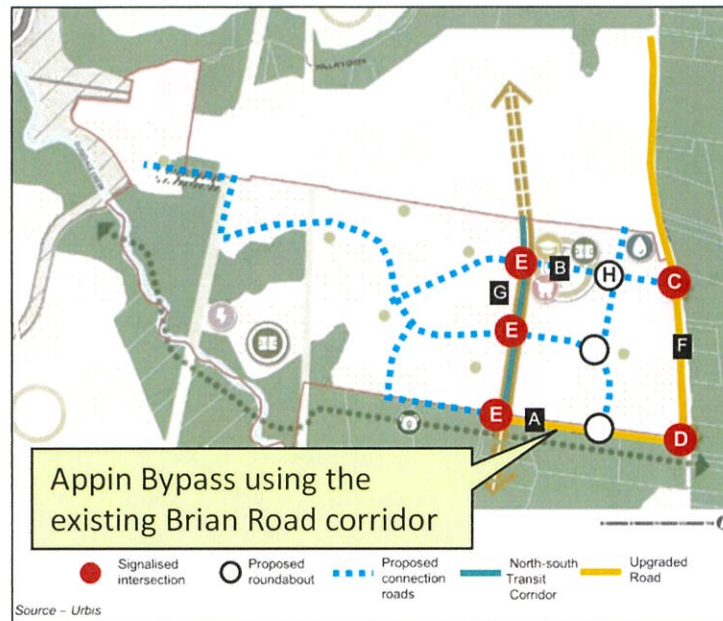


Figure 5. Superior Appin bypass option that uses the existing Brian Road corridor

- The Planning Proposal provides an indicative location for the North Appin local centre which is situated in an area that will not be developed until the middle of the development of the North Appin precinct. There is a need for a local centre in the early stages of the North Appin precinct development to provide services and amenities to new and existing residents. This necessitates the centre being located within our site next to the proposed transit corridor. This location is reasonably central for the broader North Appin precinct as a whole. The recommended location is shown in Figure 6.

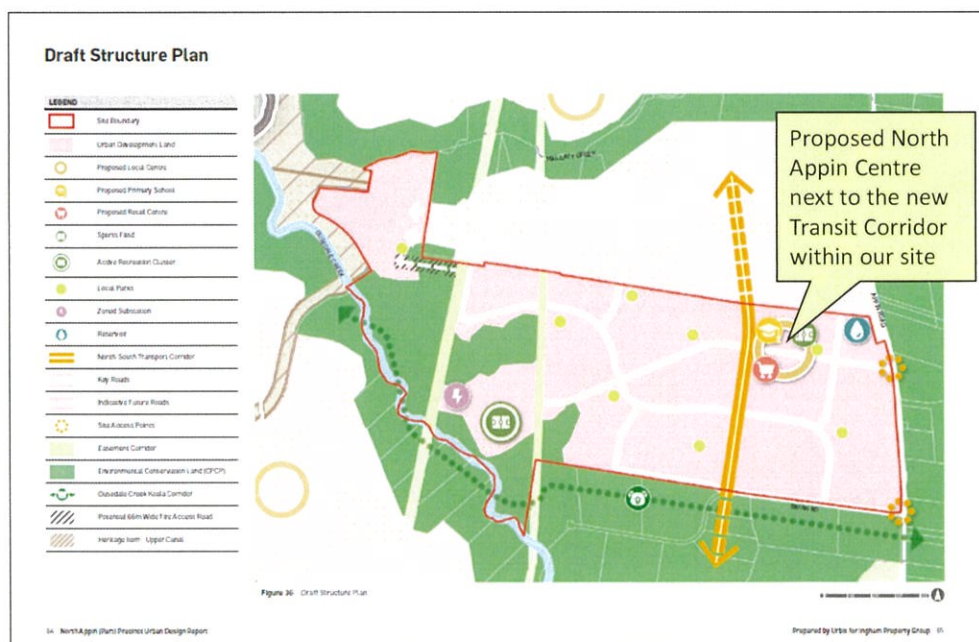


Figure 6. Proposed location of the local centre near the first stages of North Appin precinct development.

10. We are committed to working with Wollondilly Shire Council and the NSW government, state agencies and our development industry peers to ensure new development in the Greater Macarthur Growth Area:
 - Supports the conservation of native flora, endangered fauna, waterways and Cumberland Plain Conservation Plan areas;
 - Respectfully supports the growth of Appin village in a way that improves services and liveability for existing residents;
 - Supports regional growth with timely delivery of enabling infrastructure;
 - Recognises and respects the area's important first nation's history and culture; and
 - Delivers role model communities that become supply-led solutions to the NSW housing affordability challenge.
11. Due to the close proximity between the Planning Proposal and our pending planning proposal, the Department of Planning and Environment has the opportunity to tightly coordinate the planning, prioritisation and delivery of enabling infrastructure like the regional road network and the required upgrades to Appin Road.

We appreciate the opportunity to provide our comments on the Planning Proposal.

Please contact me at email: matthew.ramaley@inghamproperty.com.au or mobile: 0427 555 891 with your further queries.

Sincerely



Matthew Ramaley
Chief Executive Officer
Ingham Property Group