

Catherine Van Laeren  
Executive Director Western Parkland City  
Department of Planning and Environment  
12 Darcy Street  
Parramatta NSW 2150

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Re: Appin (part) Precinct Planning Proposal

2 February 2023

Dear Catherine,

Thank you for the opportunity to comment on the Planning Proposal for the Appin (part) Precinct. The Greater Cities Commission provides these comments internal to government to assist in aligning GCC's strategic plans and DPE's precinct planning.

If you would like to discuss these comments, please contact Kim Samuel, Director City Plan Western Parkland City at [kim.samuel@gcc.nsw.gov.au](mailto:kim.samuel@gcc.nsw.gov.au).

Sincerely,



Stephanie Barker  
Head of Strategic Planning

## Appin (part) Precinct Planning Proposal

The Commission understands that Walker Corporation Pty Ltd proposes rezoning of 1,378 hectares of land within the Greater Macarthur Growth Area Appin Precinct. It will deliver 12,000 + dwellings in stages. Release Area 1 will be the first stage and will deliver of approximately 3,500+ dwellings, as well as a retail and employment centre, a school, open space and a transport network.

The Proponent has indicated its intention to enter into three Planning Agreements to support the Proposal as follows:

- State Planning Agreement (SPA) with the Minister for Planning.

The SPA will address the funding, timing and delivery of state and regional infrastructure, such as regional open space, schools, roads, transit corridors, road infrastructure and road upgrades.

- Cumberland Plain Conservation Plan (CPCP) SPA with the Minister for Planning.

The Appin (Part) Precinct Plan includes more than 400 hectares of land to be zoned for Environmental Conservation and identified as “avoided land” under the CPCP. The SPA will result in the dedication of the CPCP “avoided land” to the NSW Government, delivering significant ecological and community benefits.

- Local Voluntary Planning Agreement (VPA).

The VPA will address the delivery of infrastructure for Release Area 1, including active and passive open space, water cycle management, traffic and transport, community facilities and riparian corridors. 1.36 The timing and finalisation of the Planning Agreements are yet to be determined.

The proposal was subject to a pilot Technical Assurance Panel process and the Department of Planning and Environment has endorsed it for lodgement. The proposal was publicly exhibited from 21 November 2022 to 19 December 2022.

A Structure Plan has been prepared to accompany the Planning Proposal which provides indicative locations of Regional and District level open space and neighbourhood centres.

### Strengths of the proposal

The Commission recognises consistency with the Western City District Plan and related policies, particularly that the proposal:

- responds to the Cumberland Plain Conservation Plan which identifies areas to be conserved for biodiversity and retains an additional 70 ha of significant vegetation;
- respects the Appin massacre sites and historic heritage;
- includes an active transport strategy linked to a regional open space facility; and
- includes the provision of affordable housing.

## Issues for resolution

Several issues have been identified, particularly in relation to delivery. In summary these include:

1. **Funding:** The Planning Proposal proposes to supply homes in tandem with State and local infrastructure funded by the proponent. However, the SPA and VPA for the Planning Proposal have not been publicly exhibited. To ensure alignment of land use and infrastructure planning and delivery, these planning agreements must be publicly exhibited and finalised prior to, or concurrent with, the finalisation of the Planning Proposal. This is particularly important as the Draft Special Infrastructure Contributions Framework for the Greater Macarthur Growth Area (GMGA) has not yet been finalised despite an updated Structure Plan and Guideline for the GMGA being finalised.
2. **Enabling Infrastructure:** Key details on staging and sequencing that provides greater certainty on delivery of enabling infrastructure is needed. This includes sewer, water and transport, as well as social infrastructure (including schools), open space and the neighbourhood centres to demonstrate that adequate services will be delivered in a timely way to support the new residential population.

The Infrastructure Delivery and Phasing Plan provides an indication of what type of facilities will be needed relative to the staging of the development. A commitment to delivery of the infrastructure according to the recommended timeframes should be included in any planning agreement such as completion of a threshold number of dwellings prior to further dwellings being commenced. In particular, a more detailed transport staging and funding plan, including contribution from the proponent needs to be developed to inform these thresholds before rezoning commences.

The infrastructure assessment notes a new wastewater treatment plant is required within 10 years when Glenfield wastewater treatment plant reaches capacity. Given the long lead times for delivery of treatment plants there are concerns that a site for the plant has not been identified or acquired within Greater Macarthur Growth area. In this context, Sydney Water's intended site selection process (in line with the technical studies underpinning the Department's Greater Macarthur 2040 strategy) needs to be considered alongside precinct planning.

A major risk in the infrastructure staging proposal accompanying the proposal is the reliance by the proponent on the State Government to deliver key transport infrastructure. This presents a major challenge to the implementation of the rezoning and the confidence in the level to which it could contribute to housing supply. The planning proposal should be updated to include a staging and sequencing plan demonstrating the roll out of development and infrastructure is achievable and allow coordination with State Government programs of delivery.

3. **Housing Diversity:** The Planning Proposal provides a reasonable mix of medium density approximately (27%) appropriate to the location. However, the Structure Plan does not provide a clear indication of where the medium density residential will be located or

certainty regarding the provision of medium density housing products. The medium density housing should be concentrated around transport hubs and the local centre. This should be included in the Structure Plan.

4. **Affordable Housing:** The Planning Proposal includes a provision to deliver 5% affordable housing as part of the medium density residential development. Clarity on the amount of medium density proposed is required to confirm affordable housing contributions proposed. The affordable housing is to be secured via a planning agreement, which should be publicly exhibited prior to the rezoning being finalised to provide certainty on the timing and type of affordable housing proposed.
5. **Open Space:** The provision of open space on the Planning Proposal site is based on the calculation of hectares per person. In particular, the following provision of open space is proposed:
  - Total open space: 3.09ha per 1,000 people
  - Active open space: 1.37ha per 1,000 people

However, the Structure Plan concentrates open space provision in some parts of the precinct, while other areas (e.g. within the northern portion of the precinct) have limited district or local parks. It is recommended that, consistent with the Draft Greater Penrith to Easter Creek Strategic Framework, the approach to open space would benefit from also including more qualitative approaches to providing open space as detailed below:

Net dwelling density	Provide access to	Median size	Minimum size	Minimum catchment and mode	Qualitative aspects
50 dwellings/ha or greater	Small park	0.45 ha	0.15 ha	200 m (2-3 min. walk)	All public open space should enhance connectivity, be accessible and flexible in its use across all scales. Access to adjoining open space may be considered if it can be demonstrated the existing open space is within the designated walking catchment and has sufficient capacity to service the additional population.
10 dwellings/ha or greater	Local park	2.5 ha	0.5 ha	400 m (5 min. walk)	
All densities	District park	10 ha	2 ha	1600 m (20 min. walk)	
	Regional park	>5 ha	5 ha	5 km (cycle, drive or public transport)	
	Green corridors and linear parks	varies	15m min width 400 m min. length	400 m	