

Draft Western District Plan

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Organisation name: Frasers Property Australia

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First name: Chris

Last name: Koukoutaris

Suburb: 2138

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15th December 2017

Ms Sarah Hill
CEO
Greater Sydney Commission

Dear Ms Hill,

Draft Western City District Plan Submission

Introduction

Purpose of the submission

Frasers Property Australia (FPA) has long been investigating the site at Cawdor in order to determine its capability to support a new master planned urban development comprising approximately 5,000 new dwellings, jobs and community facilities. Cawdor is located on the border of Wollondilly and Camden Local Government Area (LGAs) and is directly adjacent to the existing Camden Park and Camden South urban release areas.

The vision for Cawdor, to provide much needed housing, including 20% affordable housing, to contribute to both the housing targets of Wollondilly and Camden LGAs, is strongly aligned with the productivity, liveability and sustainability priorities and actions outlined in the Draft Western City District Plan (draft district plan).

FPA's approach to this submission is to:

1. Provide concise discussion regarding some key areas of interest pertaining to Wollondilly LGA, Camden LGA and the site at Cawdor;
2. Request amendments to the draft district plan to assist in realising the Premier's Priority – the delivery of urgently needed homes and affordable housing, strongly aligned with employment growth at Cawdor.

Critically, FPA is seeking meaningful and on-going dialogue with the GSC to progress urgently needed housing and support local employment delivery.

FPA previously prepared a submission to the Draft South West District Plan, which has now been replaced by the Draft Western City District Plan.

High level overview of the FPA Cawdor proposal

Cawdor is a 530 hectare (ha) site located approximately 55km south-west of the Sydney Central Business District (CBD), within the LGA of Wollondilly. The site is bounded by Remembrance Drive (east), Cawdor Road (south and west), grazing land on a separate allotment and the suburb of Camden (to the north). The northern boundary of the site is the common boundary between the Wollondilly and Camden LGAs. The site is currently under one ownership and is not flood affected.

The objective of FPA is to enable the residential redevelopment of the site in accordance with the prepared Master Plan (refer to **Figure 1** below). The site has capacity, due to its size, single ownership and location to cater for the wide variety of residential, employment and social requirements of a new community, as well as reinforcing the existing established activities within the immediate surrounding locality.

The Master Plan caters for approximately 12,000 new residents, offering a variety of housing and employment options, particularly focusing on the rapidly expanding tourism industry and the existing agricultural industry. This development will be achieved whilst still retaining 32 ha of biodiversity area in the south east of the site and complementing and enhancing the existing heritage of the site.

Figure 1 Concept Master Plan



Source: Aecom

Achieving the state government strategic directions

As part of previous site investigations, studies have been undertaken in order to ensure the capability and suitability of the land for rezoning. The investigations indicated that a Planning Proposal (PP) for the site can:

3. Build upon the key goals, objectives and actions of the '*Greater Sydney Region Plan*', particularly in relation to delivering timely and well-planned urban development, affordable housing, healthy built environments and job creation.
4. Support an amendment to Council's current planning controls to permit urban development for a range of residential, commercial, recreational, community and environmental living opportunities, consistent with the character of the local area.
5. Complement future urban development with infrastructure to accommodate the expected incoming population.
6. Ensure effective utilisation of land on the borders of Camden and Wollondilly LGAs, on a large land holding under single ownership.

Should urban development occur on the Cawdor site, it will have a significant, positive economic and employment 'boost' for the Western City. It will also assist in addressing the undersupply of housing in the greater Sydney Region.

Employment projections by MacroPlan indicate that in total, redevelopment of the Cawdor site would result in approximately 5,000 jobs; 3,950 within Cawdor itself and 1,050 jobs for employed residents within Camden town and Narellan.

Key issues

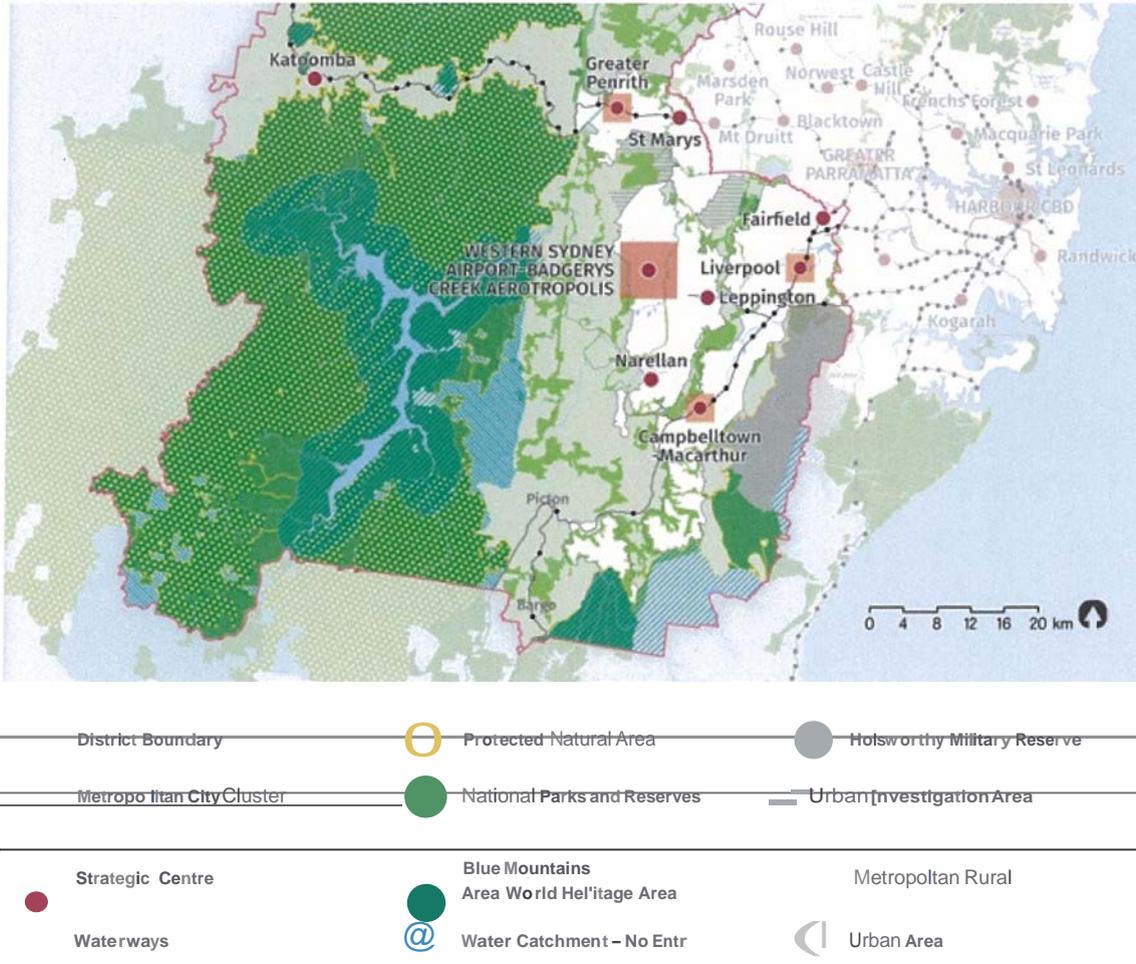
FPA has undertaken detailed studies over the broader region and the site that demonstrate the capability and suitability of the site to achieve NSW State Government's priorities as well as the strategic framework. On this basis we propose that the draft Western City District Plan be amended to provide strategic leadership and direction in the Western City.

1. Metropolitan Rural Area

The district plan identifies significant areas of the Western City district, including the site at Cawdor, as being 'Metropolitan Rural Area' (MRA). The MRA includes agricultural activities such as the production of eggs and poultry, cut flowers, turf and mushroom farms.

The draft district plan states that urban development is not consistent with the values of the MRA and that urban development in the MRA will only be considered in the investigation areas identified in the draft Greater Sydney Region Plan. The site at Cawdor is not identified as an 'urban investigation area' in the Greater Sydney Region Plan, as identified in **Figure 2** below.

Figure 2 Location of MRA



Source: Draft Western City District Plan

Planning Priority W17 Better managing rural areas states the following action, which relates to MRA areas:

Action

74. Maintain or enhance the values of the Metropolitan Rural Areas using place based planning to deliver targeted environmental, social and economic outcomes, including rural residential development.

Response

It is considered that the majority of the land classified MRA should remain as classified and its values maintained and enhanced as specified, however, given the proposed infrastructure upgrades in certain areas of the Western City, in some areas, including Cawdor, classification of land as MRA should be reconsidered.

Due to Cawdor's location, adjacent to the two existing urban release areas of Camden Park and Camden South, along with the imminent introduction of the Outer Sydney Orbital/M9 motorway (OSO), which is expected to occur in close proximity to the site, the classification of Cawdor as MRA, is

considered to be unjustified. It seems prudent that any areas located adjacent to the OSO should be earmarked for urban development.

The imminent introduction of the OSO and its likely location has been a key consideration throughout the preparation of the PP for Cawdor. Review of all available information regarding the location of the OSO indicates that it will be in close proximity to the west of the site. It is predicted that Cawdor will be wholly located within the area contained by the OSO, in which case, its classification as MRA is further unjustified.

While it is deemed appropriate for a substantial area of the land within the south west to be classified as MRA, the introduction of the OSO will undoubtedly alter the surrounding landscape, particularly land to the east. The separation of Cawdor from other MRA land to the west will result in the relationship with the current urban area adjacent to it being strengthened and will likely result in linkages being formed to and from the site to south Camden and Bridgewater.

It is considered that the land located outside of the containment of the OSO, which is currently classified as MRA, should remain so, and retained for agricultural land uses. However, given the fact that the future OSO will result in the isolation of a small area of MRA land to the east, it would seem more appropriate that the classification of this land be altered in order to access its development potential to meet the future housing needs of greater Sydney.

Given the fact that the site at Cawdor represents such a small proportion of the total MRA area (approximately 0.35%) within the south west, the loss of this area of land would not represent any negative impacts to the total MRA area. Similarly, it is estimated that Cawdor would represent less than 2% of the MRA land located to the east of the OSO. The loss of this percentage of land would be negligible in the scheme of the overall MRA area.

In terms of development potential, detailed studies over the site have demonstrated that the land is not flood affected and overland flow can be managed in riparian corridors. Heritage studies have found that no significant impacts would occur as a result of the proposed development and areas of environmental significance and cultural heritage are proposed to become features of the overall development. In addition, all significant vegetation on the south east will be retained. Therefore, the site represents a good opportunity for development.

2. Agricultural industry

The draft Greater Sydney Region Plan seeks to support and protect agricultural production and mineral resources. In the Western City District, agricultural activities such as the production of eggs and poultry, cut flowers, turf and mushroom farms, are determined to be MRA based activities. Greater Sydney's agricultural production in 2015-16 was \$645 million, equal to five per cent of NSW total agricultural value. As such agricultural processing and export is intended to be a key economic sector in the Western City.

One of the planning initiatives included within the draft plan is *"Action 30. Protect and support agricultural production and mineral resources (in particular, construction materials) by preventing inappropriately dispersed urban activities in rural areas."*

Response

As the site has been labelled MRA land, and is currently used for pastoral farming practices, notably cattle grazing, an Agricultural Lands Assessment was undertaken by Harvest Scientific Services Pty Ltd in order to determine the suitability of the site for agricultural land uses. The assessment confirmed that the Cawdor site has 'Class 2', 'Class 3' and 'Class 4' agricultural lands. NSW Agriculture recommends protecting highly productive agricultural land (Classes 1,2 and 3) from competing land uses.

Whilst the total amount of land within Classes 2 and 3 represents approximately 451 ha, the land within the site has not been used for any substantial agricultural practices for many decades. The only agricultural practices which have occurred consist of pastoral farming, which is considered to be a substantial underutilisation of the land. Therefore, the redevelopment of the site will not impact upon the current agricultural output of the Wollondilly LGA.

The redevelopment of the site, as proposed, would in fact result in increased agricultural outputs. Towards the southern side of the site, an area of 66ha has been retained and dedicated for urban agricultural activity. This large urban agricultural zone has been dedicated to provide agricultural enterprises such as flower growing, orchards, hydroponics and similar to provide employment opportunities to locals already employed in the agricultural industry. These industries are in alignment with the future vision for agricultural industries in the western city.

The draft plan considers that agricultural industries can provide produce, employment and tourism opportunities, especially as the Western Sydney Airport may provide new international markets. It is intended that the Western Sydney Airport will be a catalyst for agricultural exports from the region, with the District retaining significant peri-urban agricultural production. The proposed concept for the site at Cawdor is in line with this vision.

3. Mining

The draft district plan states that rural areas, which are part of the MRA, contribute to habitat and biodiversity, support productive agriculture, provide mineral and energy resources, and sustain local rural towns and villages. The district's rural areas are known to include mineral resources, which are capable of supplying construction materials to Greater Sydney and regional areas.

As aforementioned, Action 30 of the plan is to *"protect and support agricultural production and mineral resources (in particular, construction materials) by preventing inappropriately dispersed urban activities in rural areas."*

Response

There are known to be coal resources beneath the site at Cawdor, which is located within a coal exploration license area currently held by South32. However, no mining lease currently exists for the site. As a result, FPA have been unable to discuss future mining operations, as there is no company in possession of the lease.

To date, no mining has been proposed, approved or undertaken beneath the site. In the event that mining is proposed in the future, it would be unlikely to occur for 15 – 20 years. It should also be noted that, as and when the licence expires, there is no guarantee that it will be renewed.

Therefore, urban development to provide much needed additional housing, and particularly affordable housing, should not be assessed on the basis of potential mining operations, which may occur a minimum of 15-20 years into the future. Given the pace of population growth of the Greater Sydney area and the increasing demand for housing, urban development is critical to the State.

In addition, there is currently no clear policy in existence regarding the coexistence of mining and urban development. Therefore, there is no overarching cost benefit analysis that indicates mining outweighs the pressing need for housing supply, co-ordinated with infrastructure, in the Greater Sydney area. In some areas, land which is prime for urban development is unable to be developed due to the fact developers are forced to contend with mining interests which have been held for decades. That said, if there is planning for the coexistence upfront, it is considered that both mining industries and urban development would be able to successfully coexist.

The district plan needs to be clearer on the policy of the coexistence of mining and urban development. The potential for urban development should not be hindered, so long as adequate precautionary measures are taken. We seek that the policy surrounding mining be included in the

district plan, in order to provide strategic guidance to the Western City District on the issue of the coexistence of mining and urban development.

4. Integrated land use and transport – need transport corridors

The development of the Western Sydney airport and the establishment of surrounding metropolitan centres will result in subsequent substantial growth in the population within Western Sydney, which will in turn require improvements in the transport network and corridors. To this end, approximately \$3.6 billion worth of upgrades are already proposed to several roads; the Northern Road and Bringelly Road, the new M12 Motorway and the South West Rail Link extension and the development of the OSO. These links will improve motorway and freight rail connectivity and transport efficiency within Western Sydney and between regional centres.

The draft Western City District Plan states that major transit connections, such as the potential north south train link, Outer Sydney Orbital (OSO), Bells Line of Road-Castlereagh Connection and Western Sydney Freight Line, have the potential to create a structure for a more compact and connected Western Parkland City.

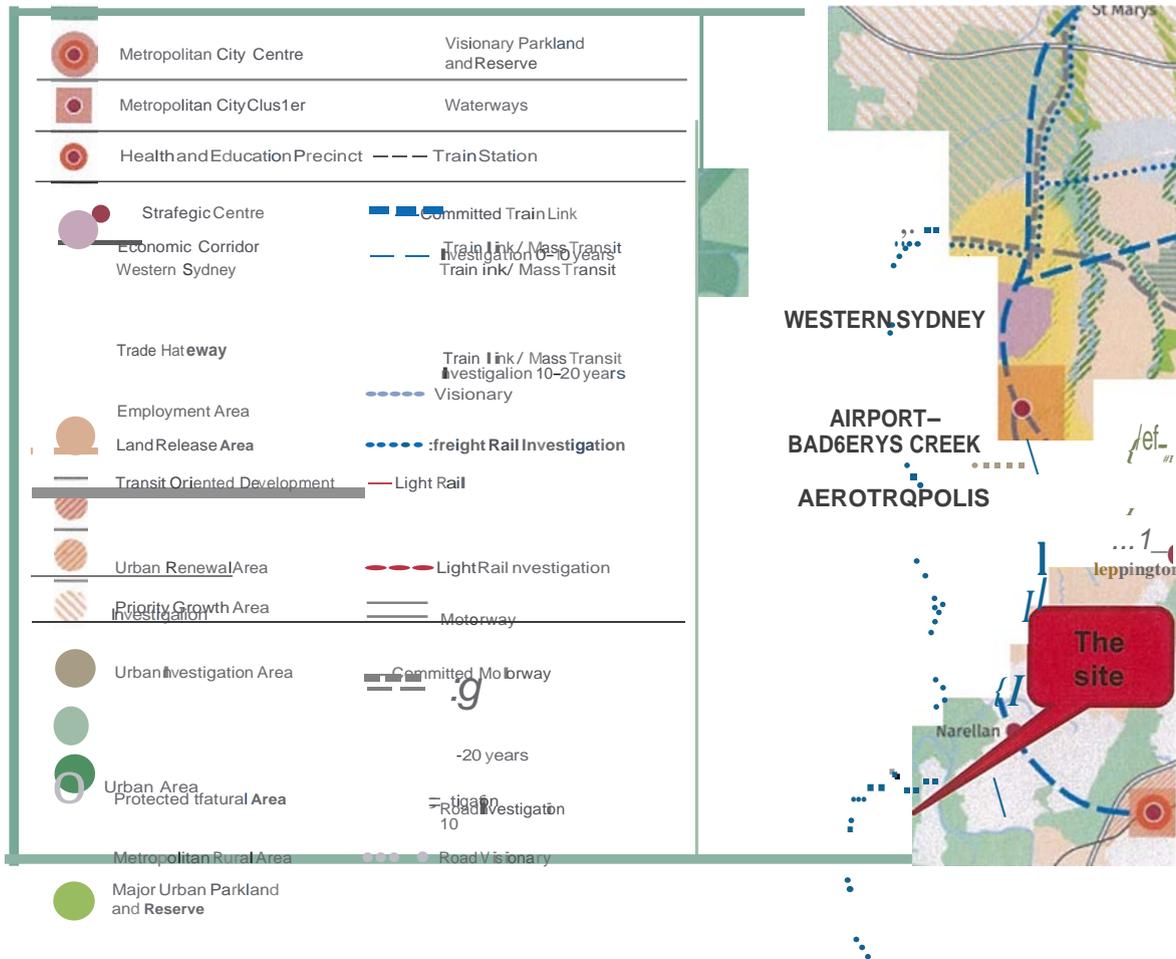
The introduction of the OSO in particular will change the structure of major transport corridors in the Western City District, as well as the relationship between transport corridors and land use boundaries. The OSO, which will extend approximately 80km between Box Hill in the north and the Hume Motorway at Menangle in the south, would dramatically alter the accessibility of numerous sites surrounding Camden and Picton. The OSO, is expected to skirt close to the west of Cawdor, as identified in **Figure 3** below.

Response

The proposed future OSO would provide improved north-south regional connectivity and a significant reduction in vehicle travel times and travel distance between the Cawdor site and western Sydney centres such as Penrith and Parramatta. Consequently, the imminent introduction of the OSO and its likely location has been a key consideration in the preparation of the PP for Cawdor.

Ready access to the OSO would tend to broaden and deepen the demand for business uses and employment together with housing as the OSO will provide ease of movement for workers from new estates in Camden and Liverpool to Cawdor. The site therefore provides an ideal location to utilise the OSO as a means of having workers and housing in close proximity. Cawdor is also likely to be a more affordable location for business/commercial purposes, by comparison to sites that are located close to the airport or Liverpool town centre.

Figure 3 Proposed location of transport infrastructure



Source: Greater Sydney Region Plan

Employment concentrations around Wetherill Park, Prestons, Smeaton Grange, Ingleburn and Minto are all currently supported by major road infrastructure including the M31, M4, M5 and M7 Motorways, which therefore makes these areas highly accessible and attractive to businesses and provides potential for employment growth. As the OSO is proposed to be located in the immediate vicinity of Cawdor, it should also be considered to have potential for the same level of attractiveness in terms of business development and housing opportunities.

Summary of proposed amendments

In light of the above discussion, we request the following amendments be made to the district plan, as identified in the table below.

Sections, Priorities and Actions

District Plan Requested Amendment

Planning Priority W1: Planning for a city supported by infrastructure

- 3. Align forecast growth with infrastructure
 - Due to Cawdor's location adjacent to future infrastructure upgrades, including the introduction of the 050, urban growth should be considered in this area.
 - If growth is to be aligned with infrastructure then the site at Cawdor offers an ideal location for development.

Planning Priority 8: Leveraging industry opportunities from the Western Sydney Airport and Badgerys Creek Aerotropolis

- 30. Protect and support agricultural production and mineral resources (in particular, construction materials) by preventing inappropriately dispersed urban activities in rural areas.
 - The draft district plan needs to be clearer on the coexistence of mining and urban development.
 - Policy surrounding mining should be included in order to provide strategic guidance to the Western City District on the issue of the coexistence of mining and urban development.

Planning Priority W17: Better managing rural areas

- 74. Maintain or enhance the values of the Metropolitan Rural Areas using place based planning to deliver targeted environmental, social and economic outcomes, including rural residential development
 - Due to the location of Cawdor, adjacent to the two existing urban release areas of Camden Park and Camden South, along with the proposed 050, the classification of Cawdor as 'MRA', is considered to be unjustified.
 - It is considered that the Cawdor land located to the east of the 050 should be considered to have potential for urban development, while land to the west should be retained as **MRA**.
- 75. Limit urban development to within the Urban Area, except for the investigation areas at Horsley Park, Orchard Hills, and east of The Northern Road, Luddenham.

Mapping

The site at Cawdor should be identified as a potential investigation area due to its proximity to existing urban release areas and future infrastructure upgrades.

Identify the potential for the site at Cawdor to accommodate future urban land, not Metropolitan Rural Land on all mapping

Ensure the site at Cawdor is not represented as being part of the MRA. This should be changed in all mapping in the draft district plan.

We look forward to a response from your office by email at [REDACTED]

Yours sincerely,



Chris Koukoutaris
Senior Development Manager
Fraser's Property Australia