

15 March 2019

Mr Bruce Coleman  
Director Land Release  
NSW Department of Planning and Environment  
Level 4, 10 Valentine Avenue  
PARRAMATTA NSW 2124

Dear Mr Coleman

**Submission: Greater Macarthur 2040: An Interim Plan for the Greater Macarthur Growth Area and Special Infrastructure Contribution.**

Thank you for the opportunity to comment on draft Greater Macarthur 2040 and Special Infrastructure Contribution that will inform future planning of the growth area. Council considered a report on the matter at its Ordinary Meeting on 12 March 2019 and resolved:

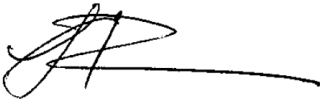
*That a copy of this report outlining the major issues identified, be forwarded to the Department of Planning and Environment as Council's formal submission to the Greater Macarthur 2040: An Interim Plan for the Greater Macarthur Growth Area and the Greater Macarthur Special Infrastructure Contribution Plan including:*

- 1. The need for additional east-west koala habitat corridors*
- 2. Provision of viable and effective fauna / koala crossings to link key habitat corridors*
- 3. Specific actions to increase the ratio of local jobs above the current baseline*
- 4. Appin Road to serve a regional arterial and not State road function*
- 5. Greater commitment to early delivery of public transport to new communities*
- 6. Alignment of the Special Infrastructure Contributions levy with the provision of housing diversity.*

Accordingly, please find attached a copy of the report and adopted minutes as Council's formal submission.

If you require any further information please contact me on 4645 4305.

Yours sincerely

A handwritten signature in black ink, appearing to be 'Fletcher Rayner', with a long horizontal stroke extending to the right.

Fletcher Rayner  
**Executive Manager**  
**Urban Release and Engagement**

**Attachment:** Extract of Council Report and Minutes: Ordinary Meeting of 12 March 2019

## 8.2 Exhibition of Greater Macarthur 2040 and Special Infrastructure Levy

### Reporting Officer

Director City Development  
City Development

### Community Strategic Plan

Objective	Strategy
1 Outcome One: A Vibrant, Liveable City	1.1 - Provide opportunities for our community to be engaged in decision making processes and to access information

### Officer's Recommendation

That a copy of this report outlining the major issues identified, be forwarded to the Department of Planning and Environment as Council's formal submission to the Greater Macarthur 2040: An Interim Plan for the Greater Macarthur Growth Area and the Greater Macarthur Special Infrastructure Contribution Plan including:

1. The need for additional east-west koala habitat corridors
2. Provision of viable and effective fauna / koala crossings to link key habitat corridors
3. Specific actions to increase the ratio of local jobs above the current baseline
4. Appin Road to serve a regional arterial and not State road function
5. Greater commitment to early delivery of public transport to new communities
6. Alignment of the Special Infrastructure Contributions levy with the provision of housing diversity.

### Purpose

The purpose of this report is to provide the Council a summary of the key issues for the Campbelltown Local Government Area as a result of the Greater Macarthur 2040 Interim Plan and Special infrastructure Contribution and seek an endorsement for a submission to the Department of Planning and Environment.

### Background

In November 2018, the Department of Planning and Environment released its draft Greater Macarthur 2040: An Interim Plan for the Greater Macarthur Growth Area, followed by the associated Greater Macarthur Special Infrastructure Contribution Plan for public comment.

Greater Macarthur 2040 is a land use and infrastructure implementation plan that will guide precinct planning within the Growth Area. The Plan is supported by strategies for major items of State and local infrastructure and includes an updated structure plan for the land release areas of South Campbelltown. Future land use plans will need to be consistent with the document which may proceed as either land owner initiated proposals or State led.

The plan builds on previous studies and strategies developed for the Growth Area including:

- 2015 Greater Macarthur Land Release Investigation: Preliminary Strategy and Action Plan
- 2015 Greater Macarthur Land Release Investigation: Land Use and Infrastructure Analysis
- 2015 Glenfield to Macarthur Urban Renewal Corridor Strategy
- 2017 Precinct Plans for each renewal precinct (except Glenfield)

A Memorandum of Understanding (MOU) was also executed between Council and the Department in 2016 to advance an infrastructure funding mechanism via the preparation of a Special Infrastructure Contribution levy (SIC).

Councillors received a briefing on the draft Plan and the SIC levy by the Director City Development on 26 February 2019, where it was agreed that a submission report be considered at the next Ordinary meeting of Council.

## Report

This section provides an overview of the Greater Macarthur 2040: An interim plan for the Greater Macarthur Growth Area (the Plan) and the SIC levy and identifies what are considered to be the key implications for Campbelltown.

### 1. Context

The Plan provides a strategic framework to facilitate and manage growth of the Greater Macarthur over a 20 year planning horizon to 2040.

The Plan is intended to guide strategic land use planning by informing the preparation of local environmental plans and planning proposals in accordance with Part 3 of the *Environmental Planning and Assessment Act 1979*. A new Section 9.1 Direction is proposed to require that all local or State planning proposals are to be consistent with the Plan. This direction will also apply to the current preparation of Council's Local Strategic Planning Statement which is required to be consistent with the vision, objectives and directions of the Plan.

### 2. Structure Of The Plan

The key themes of the Plan are place, landscape, built form, land use and movement which form part of the overall vision statement. Each theme contains objectives and planning principals that will need to be addressed in future amendments to local or State planning instruments.

### 3. Issues

The Department of Planning and Environment is seeking feedback on the Plan and proposed SIC levy. Accordingly, it is recommended that Council's submission be based on the following issues in accordance with the key themes:

#### 3.1. Place

The Greater Macarthur is comprised of 12 precincts, including seven urban renewal precincts and five land release precincts. The place objectives and principles provide for precincts that will be great places to live and work, recognise local character of places, people and the environment.

The Growth Area within the Campbelltown Local Government Area (LGA) would provide for in the order of 17,900 dwellings in the existing urban renewal corridor and approximately 39,000 dwellings in the land release precincts. Approximately 19,000 of the 39,000 new dwellings are expected to be delivered in new land releases within the Campbelltown LGA, with the remainder forming part of the Wollondilly LGA.

Key initiatives include increasing the tree canopy coverage via the development of Green Plans and ensuring that new development is supported by appropriate local and regional infrastructure.

#### Key issues for Council

- a) The proposal to increase tree canopy coverage by the development of Green Plans appears to rely entirely on the embellishment of public space such as parks, sports fields and road reserves. Concern is raised that the tree canopy target of 40 percent cannot be achieved on public land only and requires greater support to encourage take up on private land. For example, the introduction of the requirement to plant two trees in association with the Greenfield Housing Code only requires the trees to be present at the certification stage of dwelling construction (prior to occupation certificate) with no monitoring or incentive process to ensure they reach maturity.

**Recommend:** That alternate and stronger mechanisms must be implemented which could include financial incentives, rebates or the like to ensure that trees reach full maturity in all new release areas and that the objectives and benefits of a substantial tree canopy are realised.

- b) Council may be required to amend or prepare a new Section 7.11 plan (Developer Contributions) to accommodate future growth in its urban renewal and land release precincts. Under the current arrangement, land may be rezoned for urban purposes before Council has an IPART reviewed plan in force. As a result, there is a risk of development being approved in the Growth Area without provision for the local infrastructure needed to support the development.

**Recommend:** That Environmental Planning and Assessment Regulation 2000 should be amended to extend the existing provision of Clause 270A (Contribution Plans for Sydney Region Growth Centres) to also apply to land in the Greater Macarthur Growth Area.

- c) Council delivery of local infrastructure is outlined in both the Place and Implementation sections of the Plan. A draft infrastructure list is provided in the Appendix as Table 3 and includes various transport, open space and community facilities for the urban renewal and land release precincts.

Although the provision of an infrastructure list with responsible authorities is important, the funding of NSW Health facilities and State Arterial Roads via Section 7.11 contributions would be inconsistent with the Minister's Local Infrastructure Contribution Direction and 2019 Practice Note which limits the types of facilities that may be included in a Section 7.11 plan.

**Recommend:** That Section 7.11 contributions be removed as a funding source for NSW Health facilities and State arterial roads which should be fully funded from the SIC levy or other sources.

### 3.2. Landscape

Environmental conservation and protection is a key theme of the Plan and focuses on strategies for conservation of flora and fauna, including Koalas. Of particular note, a Strategic Level Conservation Plan is under preparation that will inform measures to protect the Wollondilly and Campbelltown koala population. This includes protecting a single east-west koala movement corridor along Ousedale Creek (parallel with Macquariedale Road) with a minimum width of 425 metres. In addition, development is not proposed for areas east of Appin Road, which are to be investigated for revegetation.

A grant program is also proposed to ensure koala friendly planning actions and values are held by the new community.

#### Key issues for Council

- a) Concern is raised that east-west koala movement corridors between the Georges River and Nepean River are classified by the OEH as secondary corridors for the purpose of assigning significance.

On 13 March 2018, Council adopted the South Campbelltown Koala Habitat Connectivity Strategy which confirmed the natural asset corridors in Macarthur South are sustaining resident koala populations with high occupancy rates; confirming not only the presence of koalas, but the importance of the natural asset corridors in providing koala movements and the exchange of genetic material between the Campbelltown and Nepean Koala populations. Details of this study have been provided to the Department and OEH with no acknowledgement of its findings in the Plan.

**Recommend:** That sustainable and effective east-west environmental corridors catering for the safe movement of fauna between the Nepean River and Georges River areas, must be provided within the Campbelltown LGA as part of the Greater Macarthur Release Area.

- b) The issue of facilitating appropriate habitat crossings in relation to the proposed Appin Road upgrade and Safety Improvements projects has been raised at a number of Koala roundtable meetings held by the NSW Department of Planning and Environment (DP&E), and made in writing to a number of State and Federal Ministers.

Concern is raised that neither project has explored the logistics of any opportunities to design, develop and incorporate evidence-based ecological road design solutions (eg fauna overpasses and/or underpass structures) to mitigate fragmentation of core habitat, retain corridor connectivity and minimise the significant impact both projects are likely to have on intrinsic biodiversity values in the south Campbelltown area.

**Recommend:** That the current planned upgrade of Appin Road incorporate grade separated fauna crossings that cater for the safe movement of all native wildlife.

- c) The proposed \$1 million grant program to be expended over two years appears to exclude koala care from its scope. As habitat management and replanting is likely to form part of the Cumberland Plain Conservation Plan which will be separately funded, it is appropriate that veterinary services and the like be eligible for funding.

Further, urbanisation of South Campbelltown will occur over the next 50 years and will demand a recurrent program to support ongoing community based actions.

**Recommend:** That the proposed grant program be recurrent and also apply to developing a koala care program.

### 3.3. Land Use

The Growth Area will offer a mix of residential, commercial and industrial uses along existing and proposed transport corridors. Key themes include housing diversity, affordable housing, job creation and provision of social infrastructure. Economic development initiatives will also be prepared in consultation with Council to target an additional 20,000 jobs over 20 years.

#### Key issues for Council

- a) Concern is raised that the proposed target of 21,000 additional jobs in the Glenfield to Macarthur Corridor and 20,000 additional jobs within or accessible to release areas does not contribute to increasing the current ratio of jobs to every working aged person. In a typical Australia City, the urban region will have a ratio of 0.7 jobs to every working aged person. The current draft plan, would only add enough jobs to maintain the current ratio for Campbelltown which is below 0.5 jobs.

As outlined in Council's Re-imagining Campbelltown CBD vision, the Macarthur Region currently suffers from a deficit of local jobs, resulting in 64 percent of working residents leaving the region every day for work. This is inconsistent with objective of achieving a 30 minute city, where people live within 30 minutes of their job.

**Recommend:** The Plan should include specific actions to attract specialised employment and aim towards an increased jobs target to improve the current employment ratio and reduce existing commute times.

- b) Schools are an important part of the urban fabric and planning for their location to enable safe and convenient access should be a priority. Unfortunately, there have been recent examples across the Sydney Metropolitan Area where new schools have been delivered on sites not envisaged by the precinct plan or the size and scale has changed. In addition, supporting transport infrastructure such as employee parking, traffic signals and pedestrian crossings is not seen by the Department of Education to be their responsibility and should be urgently addressed.

**Recommend:** That provision for, and location of new schools be identified in new precinct plans, so that supporting transport infrastructure can be provided to support safe and convenient access to students and school employees.

- c) Unlike the Glenfield to Macarthur corridor, land release areas do not enjoy convenient access to public transport, shops and services during the early years of development. Therefore, the provision of medium to high density housing should only proceed when suitable services are available to meet demand.

**Recommend:** That provision of medium to high density housing in land release precincts also be linked to proximity and availability of public transport, shops and services.

- d) Concern is raised that the Plan does not provide clear guidance or high level planning response to key housing issues relevant to Campbelltown.

This includes:

- Responding to an aging population and the demand for aged care housing and support services
- Responding to demographic needs such a high number of more people living alone
- Ensuring new housing supply responds to the social needs of the population and is not only affordable but also adaptable

**Recommend:** The Plan incorporate strategies that ensure housing diversity is provided across the Growth Area in addition to the rezoning of land. It is essential that new housing meet the social needs of our population.

### 3.4. Movement

The Plan proposes a number of transport solutions that are intended to support the State Government's Future Transport 2056 Plan. Key initiatives include:

- Extension of Cambridge Avenue from the rail line to the Hume Motorway to service Glenfield West
- A road connection over the rail corridor at Badgally Road to prioritise bus and active transport
- Minto/Ingleburn Industrial Link Road
- A connection between the Hume Motorway and Road at Rosemeadow (Spring Farm Parkway)
- A new east-west connection in Gilead south of Beulah
- A new east-west connection through West Appin
- A transport corridor running north-south through the land release precincts to the rail line at Douglas Park

The Plan also aspires to improve public transport so that 70 percent of people live within 30 minute of work, study and leisure opportunities.



**Key issues for Council**

- a) The proposed six lane upgrade of Appin Road between Rosemeadow and Mt Gilead is inconsistent with Council's vision for the Campbelltown CBD and does not appear to consider the role of Appin Road/Narellan Roads in carrying through traffic.

Appin Road should be serving a regional arterial function, delivering traffic to Campbelltown from areas to the south, not a State Road function transferring through traffic across Campbelltown.

Through traffic should be diverted via the future Spring Farm Parkway and the West Appin sub-arterial connecting to the M31 Freeway at Douglas Park (possible Stage 1 Outer Sydney Orbital) when constructed. This would free up capacity on Appin Road and Narellan Road to service the growing traffic needs of the Campbelltown/Macarthur growth precinct identified in the State Government's Corridor Strategy and further supported in Greater Macarthur 2040.

**Recommend:** Appin Road should be designed as a four lane road consistent with the existing sections of Appin Road from Fitzgibbon Lane to Narellan Road. Cost savings from a reduced corridor width would be better applied towards a link road corridor currently under investigation by the RMS, with construction of the Appin Road upgrade being commenced from the centre of the road corridor, instead of from the outside-in. This would assist in the further protection of natural areas along the outer edges of the road corridor, in the case that due to other infrastructure coming on line in the future that reduced the traffic volume along Appin Road, the six lanes are found to not be required (such as possibly extending Appin Road directly east to meet the M31 Freeway).

- b) Concern is raised in relation to the role of the Jacobs report in scoping the future transport strategy for the Greater Macarthur given it was published in December 2017. Since this time, the announcement of the Outer Sydney Orbital, North South Rail Line, Greater Macarthur 2040 and the SIC levy have occurred which substantially alter the transport planning landscape.

**Recommend:** That modelling assumptions be updated to reflect a strategic level assessment of future transport planning outcomes for South Campbelltown that consider the future transport demand arising from contemporary information.

- c) The Plan suggests that the northern part of the Growth Area is well served by rail and bus transport with a comprehensive road network. Concern is raised that the Plan does not recognise the limitations of the existing transport network and public transport inefficiencies. This may limit the success of the urban renewal corridor and further increase local road congestion and residents reliance of private motor vehicles as a primary mode of transport.

Issues with the existing transport systems include (but are not limited to):

- circuitous routes
- infrequent services
- very limited provision of bus priority treatments, reducing the speed of bus travel relative to car use on a congested road network at peak times.

Furthermore, this reliance will increase local traffic congestion and reduce the attractiveness of Campbelltown-Macarthur as a destination in its own right, and as a focus for economic investment.

**Recommend:** The sustainable development of the Glenfield to Macarthur renewal precincts must be supported by a network of rapid bus or other road-based transit services.

- d) The Plan supports future transport integration between the North West, Western Sydney Aerotropolis, South West and Greater Macarthur growth areas. However, the success of this transport integration is reliant on upgrades to key road-based transit corridors. This will support development of the Glenfield to Macarthur precincts and improve their connectivity to, and through the South West Growth Area.

**Recommend:** The Plan be amended to identify the following key road based transit corridors and incorporate required upgrade in transport infrastructure planning and delivery:

- Badgally Road / Rickard Road corridor and Narellan Road corridor
- North-south corridor
- Raby Road corridor
- Bringelly Road corridor

- e) Concern is raised regarding the level of commitment and priority of the bus head start program referenced in the Plan. The Plan suggests that through Future Transport 2056, Transport for NSW has committed to a bus head start program to ensure that residents of new release areas have access to high quality bus services that are fast, frequent and direct from day one of occupation.

Despite this program being first announced by the State Government in the 2013 modal strategy Sydney's Bus Future, Campbelltown has not seen evidence of a coordinated effort from Transport for NSW and Roads and Maritime Services to deliver on these commitments in practice. It is also noted that the bus head start program has not commenced in the nearby Wilton Priority Growth Area.

**Recommend:** The Plan reaffirm its commitment to the bus head start program and provide clarity in regards to the timeframe for the delivery of bus services for new land release areas.

- f) Council has previously made a submission on the Outer Sydney Orbital, North South Rail Line and South West Rail Link Extension transport corridor protections. This submission is relevant to the Plan, particularly with respect to matching the planning horizon to Future Transport 2056 and early delivery of the rail connections between the Western Sydney Airport and Campbelltown.

In addition, electrification of the rail link from Macarthur to Wollondilly is listed as a public transport project in the State Governments recently released Future Transport Strategy 2056. However, it is understood that any future works would be for freight purposes only, which further increases the need to address the southern alignment of the Western Sydney Airport rail link to Macarthur to also service Menangle Park.

**Recommend:** That the Department receive and give strong regard to the recommendations of Council's submission dated 15 June 2018 as they relate to the Plan (see attachment).

- g) Concern is raised that the proposed 30 minute city objective is not supported by the strategy with respect to achieving transit oriented outcomes. Current projects under consideration such as the Appin Road upgrade, Spring Farm Parkway and Link road will simply connect these release areas to existing roads, with no transit priority provision.

**Recommend:** That the Plan be strengthened to provide further clarity around the alignment and delivery timing for key transit projects, including the north-south transport corridor.

### 3.5. Implementing The Plan

Implementation of the Plan requires a coordinated approach between the relevant Agencies, land owners and consent authorities to achieve orderly development. This requires the planning pathway for rezoning and development of land to align with State Agency budgets and for utility services to available.

#### Key issues for Council

- a) Although the Plan refers to the opportunity for proponent led planning proposals, it is not clear whether this applies to land release precincts. The proposal to apply the Urban Development Zone via the Growth Centres SEPP would suggest that State led amendments will only be considered.

**Recommend:** That the Plan be amended to clarify the planning pathway for land release precincts.

- b) Concern is raised regarding the role of the Planning Partnership in rezoning the urban renewal precincts for Macquarie Fields to Macarthur. The Planning Partnership does not have any particular delegation to undertake this function and would also add another layer to the existing process which involves the provision of advice from the Local Planning Panel prior to a resolution of Council to seek a Gateway Determination.

**Recommend:** That the Plan be amended to clarify the role of the Planning Partnership for urban renewal precincts.

### 3.6. Proposed Special Infrastructure Contribution

A Special Infrastructure Contribution levy (SIC) is a charge paid by developers within Special Contribution Areas to ensure funding for key infrastructure required to support growing communities. A draft SIC levy is proposed to support the cost of new infrastructure valued at \$1.58b to support new homes in Menangle, Gilead, North Appin, West Appin and Appin East over the next 30 years, including:

- regional roads
- land for schools, community health facilities, police and emergency facilities
- biodiversity conservation
- planning and delivery costs.

The draft SIC levy is calculated on additional residential dwelling / lot basis. There are three rates proposed for the Grater Macarthur Growth Area being:

- North: \$39,710
- Central: \$43,985
- South: \$43,432

The proposed SIC levy does not apply to the urban renewal precincts of the Greater Macarthur which will be separately prepared and exhibited.

### Key issues for Council

- a) The proposed flat rate per additional dwelling or lot is likely to impact on dwelling diversity as developers will seek to target housing product to optimise return on investment. This outcome is inconsistent with the place and land use principles of the Plan and is also inconsistent with the standard nexus approach imposed on Section 7.11 contribution plans. This will result in higher contributions than otherwise required for one and two bedroom dwellings and would not promote dwelling sizes that match demographic trends in household size.

**Recommend:** That the proposed SIC levy be amended to have a separate rate for one, two and three bedroom dwellings to encourage housing diversity.

- b) The proposed SIC levy rates are informed by a feasibility assessment that assumes a capacity to pay of \$75,000 per dwelling/lot. The assessment does not account for Section 7.11 contributions applied by Council which may exceed this threshold.

The Independent Pricing and Regulatory Tribunal (IPART) recently endorsed the Menangle Park Contributions Plan. The combined SIC levy and Section 7.11 contribution rate for development in Menangle Park would be approximately \$96,176 per lot, which exceeds the capacity to pay. This issue is further compounded by the proposed flat rate per dwelling as raised above.

**Recommend:** That the supporting feasibility assessment for the proposed SIC levy be updated to account for local Section 7.11 contribution plan rates.

- c) The proposal to apply a per-dwelling rate in the Growth Area is likely to generate a significant compliance and administration process for complying development.

Certifying authorities are currently required to consider Section 4.28 (Complying Development) of the *Environmental Planning and Assessment Act 1979* (Act) and Sections 136K and 136L of the Environmental Planning and Assessment Regulation (Regulation) when issuing a complying development certificate. Assuming the Act and Regulation is updated to reference the SIC levy, works may not commence until the relevant monetary contribution is made.

Council has experienced non-compliance with this requirement in relation to Section 7.12 levies and responds by issuing advice to the relevant certifying authority for payment. In some cases, works have commenced without payment giving rise to compliance action which is an additional administrative burden.

**Recommend:** That the obligation on certifying authorities in the Act and Regulation is updated to reflect the requirement to pay the SIC levy in the Greater Macarthur. In addition, that Council's be consulted in relation to the administration process for collection and enforcement.

- d) The proposed SIC levy does not include secondary dwellings in the list of additional residential dwellings subject to the plan.

**Recommend:** That the proposed SIC levy be updated to reference secondary dwellings and provide a differential contribution rate to reflect the lower occupancy rate for this form of development.

- e) The schedule of works only identifies a land acquisition value for the Transit Corridor. Transport planning for release precincts is often prepared on the basis that trip generation rates (to inform road and intersection design) include allowance for public transport use. The exclusion of capital towards actual delivery of the transit-way may cause significant delay and place further pressure on State and local roads in future years.

**Recommend:** That a capital value be included in the SIC levy for the future construction of the north-south transit corridor.

## Conclusion

In December 2018, the NSW Government placed the Plan and draft SIC levy on public exhibition until early February 2019. The Plan includes objectives and planning principles relevant to the key themes of place, landscape, built form, land use and movement.

Unlike previous land use strategies, recent amendments to the *Environmental Planning and Assessment Act 1979* now give greater statutory weight to the Plan. Council will be required to give effect to the Plan and demonstrate consistency of future amendments to the Campbelltown Local Environmental Plan 2015 against the objectives and principles of the Plan when undertaking or reviewing future strategic plans or planning proposals.

It is recommended that a submission be made to the Department of Planning and Environment supporting the intent of the draft Plan and proposed SIC levy and suggesting amendments that would assist with addressing key local issues.

## Attachments

1. Submission dated 15 June 2018 - Outer Sydney Orbital, North South Rail Line and South West Rail Link Extension (contained within this report)



15 June 2018

Ms Denise Wilson  
Principle Manager Corridor Preservation Communication  
Transport Planning  
Freight, Strategy and Planning  
Transport for NSW  
Level 3, 18 Lee Street,  
Chippendale NSW 2008

Dear Ms Wilson

Council is pleased to make the following submission on the proposed transport corridor protections. Council appreciates the extensive work that has been undertaken to date and acknowledges that this is not the final opportunity to have discussion on the proposals.

Without bringing forward the points within the submission, I would like to emphasise Council's view that there are a number of pieces of rail infrastructure construction work that need to be operational prior to the opening of the Western Sydney Airport (WSA). Protection of the corridor is extremely important but the early provision of some of the works is just as essential if we are going to see the full potential of the investment in the WSA.

Council is of the view that works could be undertaken on the existing rail network that will provide the crucial connectivity between the Macarthur region and the WSA. Although Council has raised a number of these points in previous submissions they have not been addressed in any of the documents provided on the corridor protection proposal. I would ask that an urgent meeting be held with my senior executives where Council may understand why the Department does not seem to see merit in what Campbelltown has proposed. In addition, Council may be able to express the benefits it believes these works would bring to the Macarthur District and the success of the WSA.

On behalf of Council thank you for considering our submission and I look forward to facilitating a meeting with senior members of the Department to discuss this matter further.

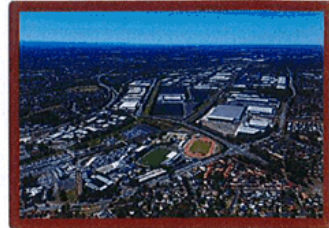
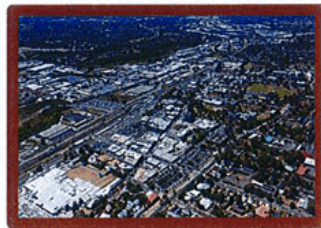
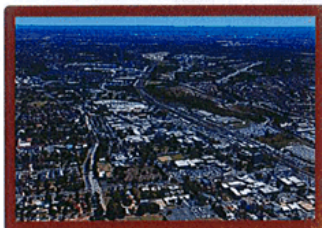
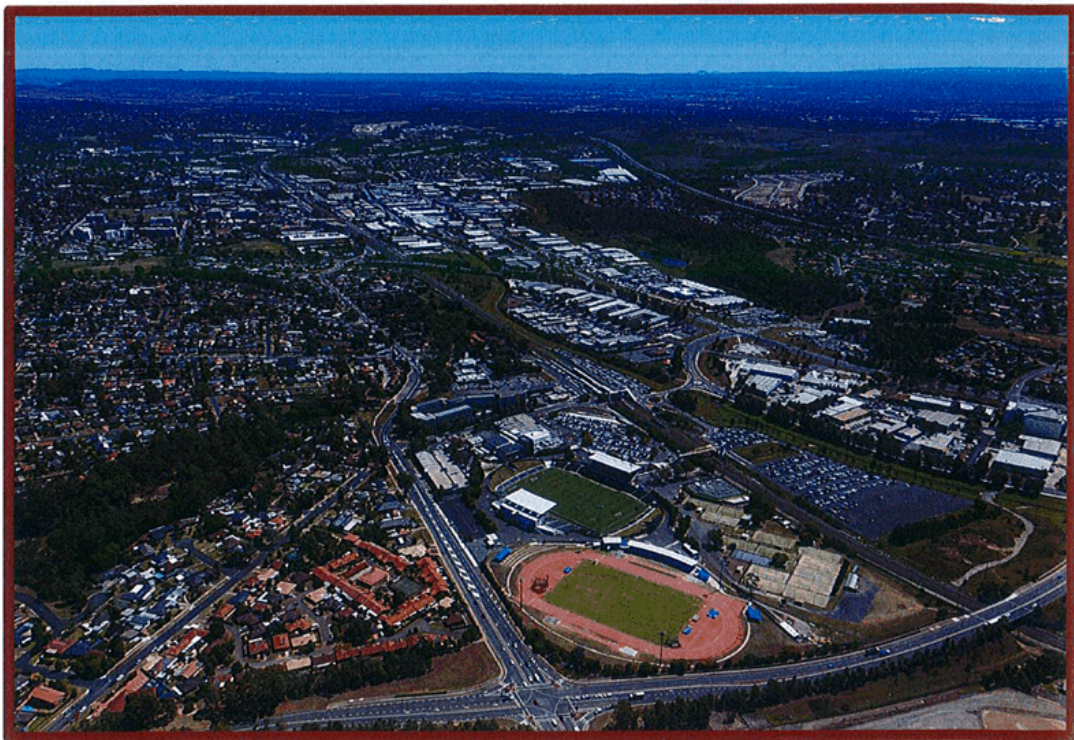
Yours sincerely

Signature removed

Lindy Deitz  
General Manager

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## Submission to Outer Sydney Orbital, North South Rail Line and South West Rail Link Extension



## 1 Overview

Campbelltown City Council is providing feedback to Transport for NSW (TfNSW) in relation to the three transport corridors proposed to service the Western City District urban area south (Figure 1):

1. South West Rail Link Extension (SWRLE)
2. North South Rail Line (NSRL)
3. Outer Sydney Orbital (OSO).

The principal issues of concern to Council are summarised below. Subsequent sections provide more detailed comments specific to each of the three corridors (referenced in Figure 2). If required, Council can brief TfNSW directly on the issues raised, using plans prepared to a greater level of detail than can be included in this submission.



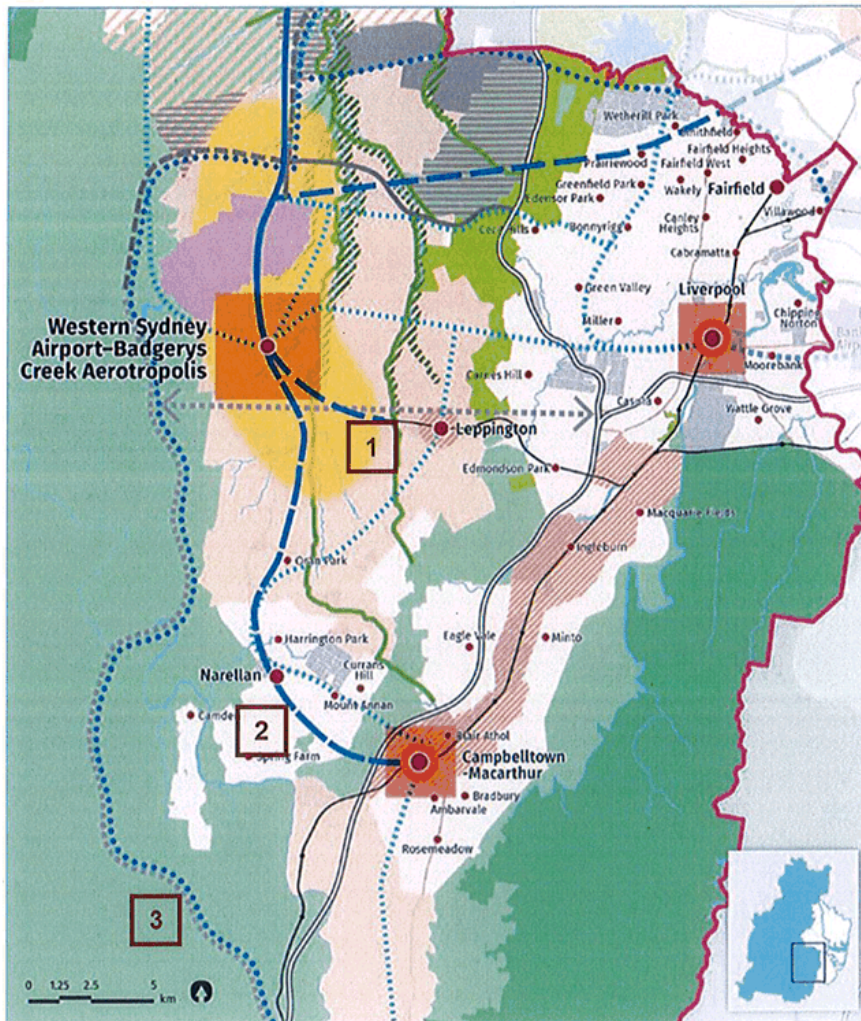


Figure 1 Western City District Plan: Structure Plan for the urban area south, showing transport corridors

### 1.1 Principal issues for Campbelltown

Council supports in principle an evidence-based process to identify and protect land on which transport infrastructure can be built in the future. At its most effective, corridor protection enables the delivery of major transport assets in the most economically efficient and sensitive manner: at surface but with a buffer to sensitive areas and existing land uses; full consideration of impacts and opportunities on developed and undeveloped lands; and at the time when urban development along the corridor has reached the threshold at which travel demand justifies investment. No application of this process could be more important and critical than planning ground transport links to support once-in-a-century investment in an international airport.

Campbelltown Council Submission (June 2018)



In practice, the effectiveness of the corridor protection process, and Council's support for it, are conditional on:

- a) the most appropriate corridors being identified and protected;
- b) the protection of additional transport corridors that take into consideration the movement of people around the whole Macarthur region not just the transporting of people between centres;
- c) the extension of the limits of the Outer Sydney Orbital stage 1 corridor through to Appin Road;
- d) the realignment of the southern end of the NSRL into Menangle Park, not directly to Macarthur station;
- e) complementary land use and transport planning actions being commenced and, in some cases, completed before corridor reservations are finalised; and
- f) where the terrain provides the opportunity, the road and rail network should be buried through a cut and fill operation providing active land bridges over the transport network to ensure active and connected communities, as well as assisting with the safe and viable movement of fauna through these areas. This will increase the Government desire to create a sense of place around transport infrastructure build.

One consequence of a corridor being formally protected for transport use is that the land outside that corridor is at the same time effectively designated as being available for other uses. Thus, the corollary to the NSW Government using transport corridor protection to minimise future land acquisition and project delivery costs, is the risk that further required transport investments, if unforeseen at the time of corridor protection, will end up costing more. To mitigate this risk, there is pressure on corridor protection to "be done once and done well".

To that extent, corridor protection for south-western Sydney should look at least as far ahead as the NSW Government's own strategic planning horizon – i.e., to 2056, in line with the Greater Sydney Region Plan and *Future Transport 2056* suite of planning documents. Well within this horizon, Council's position is that the following strategic land use and transport needs should be provided for through the future-proofing of the transit system, but have but not yet been addressed by TfNSW's corridor identification work:

- The growth of the Western City south requires the development and operation of transit systems which provide a level of access between Campbelltown and other district centres that is equivalent to or better than today's direct train services to the Sydney CBD. Ensuring that the best system to service these needs can be delivered when the need arrives, land should be protected now for the provision of direct rail connections ("Y-links") between existing and new rail lines.
- Within a 40-year planning timeframe, the Greater Macarthur Growth Area shown in the Western City District Plan will be fully or substantially developed, with a population in the order of 850,000 people in the district. The

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sustainable growth of this area requires the urgent consideration and protection of a realigned corridor section at the southern end of the NSRL; and of southern and eastern extensions from the NSRL and OSO corridors. These elements of a protected transport corridor network will be required in order to provide effective and efficient connections between the Greater Macarthur Growth Area and Greater Sydney – and the broader Western City south to the Illawarra region.

- The southern end of the NSRL should be realigned so that it feeds directly into Menangle Park and then onto Macarthur station thus providing improved access to the identified “city servicing transport corridor” through the centre of Macarthur South Growth precinct. This realignment will provide significantly greater opportunities for the provision of additional railway stations, in turn providing the communities within Camden and Wollondilly with improved access to the major transport networks.

In parallel, and fully integrated with the corridor identification (including the adjusted and additional corridor elements outlined above), TfNSW should undertake complementary transport planning activities that start to deliver the connectivity that the Western City south requires ahead of the development and operation of new rail and motorway links.

Planning should focus on the following issues, needs and opportunities:

- As previously noted, the formal gazettal of protected transport corridors will immediately remove some constraints on the development of greenfield areas along those corridors. This will result in an increase in the new population to the area. This resultant growth, on top of background growth in Campbelltown and neighbouring LGAs, will result in significant road congestion and related impacts on existing communities, unless interim improvements are made to transit services and operating assets.
- This transport planning will be required even under the best currently presented scenario for the development of rail to Western Sydney Airport (WSA). This has the NSRL connecting from St Marys only as far as WSA Aerotropolis (North Bringelly) by the time the new airport is operational in 2026. Hence it will be important for TfNSW and RMS to have progressed planning and delivery for rapid bus links connecting Campbelltown (through Camden LGA) and Liverpool to WSA Aerotropolis before transport corridors are finalised for protection.
- To maximise the viability of rapid bus services, and the access they provide to emerging centres, they should be routed via future NSRL and SWRLE station sites. The location of these nodes therefore needs to be identified as a matter of urgency before the relevant transport corridors are confirmed and protected.

- Additionally, connecting road links should be completed to and through emerging centres to enable the operation of direct and efficient bus services via (where necessary) new release areas whose existing road networks are partial and disconnected. In some cases, the necessary road link for buses may be provided as a temporary facility within the protected transport corridor itself, if this is configured to allow that interim use.

In saying this, Council is of the strong view that the delivery of the rail connections between WSA and Campbelltown should be brought forward and not replaced by the provision of a rapid bus solution. The rapid bus is an important compliment to the rail network not a replacement. A direct quote from the DSEA highlights the importance of these networks

*The North South Rail line will act as a catalyst for the new Western Economic corridor. The provision of high capacity public transport will support the growth of the Western Economic Corridor by improving access to a wide range of jobs in new and existing centres and health education assets in the Penrith Health and Education Precinct and at Campbelltown – Macarthur.*

Council see the early delivery of the SWRLE to the WSA as also being supported by this statement.

## 2 North South Rail Link

Council's understanding is that Stage 1 (St Marys to the WSA Aerotropolis) of the NSRL is to be delivered by the time that the WSA opens in 2026, subject to the business case now being prepared. Stage 2 (the southern link to Macarthur via Narellan) has not been provided with a delivery date. The current proposal for Stage 2 is for corridor protection, and further investigation in the context of other potential Western Sydney rail links including the SWLRE.

Of immediate and major concern to Council is that there is very little detail available in the corridor identification study regarding design options at the Macarthur end of the proposed tunnel from Oran Park. Council therefore requires the design-based clarification of the following issues before the confirmation of a preferred corridor:

- Based on the indicative tunnel corridor shown in TfNSW's maps for consultation, there is no certainty around how the NSRL would connect to Macarthur station. It is unclear whether the new rail line would exit from a tunnel prior to, or within, the existing Main South Line (T2) rail corridor.
- If the tunnel were to exit prior to the existing T2 rail corridor on its western side, there would be significant environmental impacts on Thompson Lake and the flood-prone area adjacent to Council's proposed Sports & Health Centre of Excellence, due for completion in late 2019.
- The NSRL alignment would potentially have to use an elevated structure to pass over the Southern Freight Line (which sits within the western section of the Main South Line corridor). This could have both visual and noise impacts on Macarthur Heights and Glen Alpine residential areas.
- There could also be impacts on the pedestrian rail overbridge that is proposed to link the Sports & Health Centre of Excellence to the west of the Main South Line corridor with the Menangle Road / Gilchrist Avenue intersection to the east of the railway.

Looking to the longer term, Council notes that there is no indication in TfNSW documentation of how the NSRL as currently proposed could benefit the major population increase expected in the Greater Macarthur Growth Area. This represents a missed opportunity which, if not taken, will result in Council bearing the cost of road upgrades and additional commuter car parking to meet this demand.

As a significant opportunity to improve the effectiveness of the transit system, including the NSRL, for the Greater Macarthur Growth Area as well as for existing suburbs, Council has therefore identified the potential for the southern section of the proposed NSRL corridor to be realigned between Narellan and the Campbelltown Local Government boundary; for the location of the identified potential sections of realignment and extension see boxes (A) and (B) in Figure 2.

The potential realignment and extension identified by Council would offer the following features and strategic benefits:

- Within the area shown by box (A), strategic rail engineering concepts already prepared for Council indicate that a realigned NSRL corridor can be located on the south-eastern side of the Main South Line (i.e., away from the WSU precinct altogether). This realignment provides a loop from Macarthur station that crosses the Main South Line at a point within the northern section of the Menangle Park growth precinct. The realigned corridor is co-located at this point with the proposed Spring Farm Parkway Link road.
- This section of realignment offers the opportunity for one or more additional NSRL stations; at Menangle Park north, Royal Botanical Gardens and at Mount Annan.
- Subject to the extension of rail electrification south of Macarthur, a station at Menangle Park north would provide an interchange between two major rail lines, within a high-profile growth precinct. This interchange would significantly improve access to Greater Sydney rail services for the Camden, Wollondilly and Southern Highlands communities, reducing growth pressures on the arterial road network and associated upgrade expenditure needs.
- Mount Annan is shown in the Western City District Plan as a future transit node; this would service the ongoing development of the Australian Botanic Gardens as a regional, national and future international destination, connected by direct rail services to WSA.
- South of Menangle Park, the realigned corridor section highlighted in box (A) provides the appropriate framework for the NSRL to be extended, providing a rail spine through the heart of the major Greater Macarthur Growth Area – see box (B), along the identified City Servicing transport corridor. This extension would drive sustainable and transit-oriented development outcomes in Greater Sydney's most significant remaining growth area, with higher-density development yields offsetting the cost of extended rail links. This important transport corridor could allow for the development of the first non-car dependent communities within Macarthur.

Based on strategic rail construction advice obtained by Council, a realigned corridor, with one or more stations servicing Narellan Vale and/or Spring Farm, could be deliverable at a significantly lower cost than the currently identified underground alignment between Narellan town centre and Macarthur.

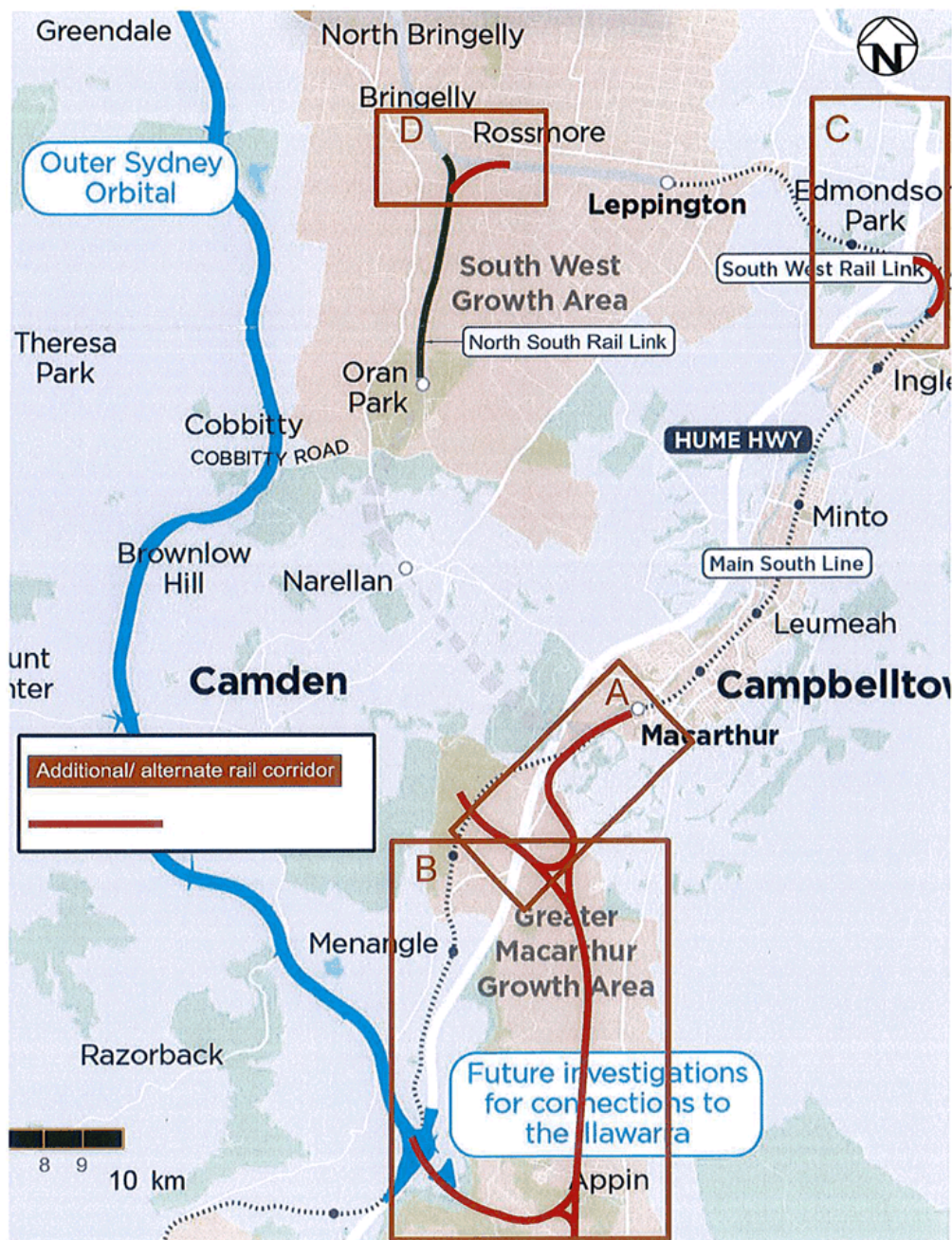


Figure 2 Locations of alternative and extended transport corridor sections

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### 3 South West Rail Link Extension

At this point, as with the southern section of the NSRL, there is no proposed delivery date for the SWRLE. The current proposal by the NSW Government is that both the SWRLE and NSRL (south of the Aerotropolis) will be subject to further investigation, and only corridor reservation will be considered at this stage.

Council does not support this timeframe, on the basis that the Draft Strategic Environmental Assessment (DSEA) completed for TfNSW on the SWRLE and NSRL corridors identifies that Campbelltown LGA is expected to provide the main workforce for the construction and the early operation of the airport.

Notwithstanding this finding, and the importance of direct transit to service this demand, there is no indication or commitment in the DSEA or other NSW Government planning documents as to when significant investment will be made in any new rail mass transit to service the Western City south.

While the Western Sydney City Deal does commit to the delivery of rapid bus services between Campbelltown and the WSA-Aerotropolis, and both *Future Transport 2056* and the Western City District Plan (see Figure 2) indicate additional proposed rapid bus or other transit corridors for the Western City south, there is no or limited detail available on the scope of these proposals.

This exacerbates the significant risks already associated with uncertainty or delay around the completion of the SWLRE, a missing link in the rail network that will connect the established suburbs in Campbelltown LGA to jobs and other opportunities at WSA-Aerotropolis. These risks include major road congestion ramifications for the proposed growth of Campbelltown LGA and the Western City south, with potentially severe impacts on Gross Regional Product.

Additionally, even when it is delivered, the configuration of the SWRLE as currently proposed will not provide a “no-change” rail service for customers using the SWLRE to travel from Campbelltown CBD (and from stations to the north of the CBD) to the WSA or to the Aerotropolis east of the airport. Under existing and assumed future rail operating patterns, patrons using existing Campbelltown T2 services will be required to change to a T5 service at Glenfield, while patrons travelling from points north of Glenfield will have a direct service to the WSA.

This could prove a disincentive to rail use – especially for people with mobility issues, and for commuters who will already have to travel a long distance on a feeder service from home to their nearest station. For travellers originating beyond Campbelltown, from as far south as Canberra, direct NSW Trainlink services to WSA-Aerotropolis will also be highly beneficial.

On this basis, Council has already made, and still strongly supports, a submission to the NSW Government, in response to the Western Sydney Rail Needs Scoping Study and the Western Sydney District Plan, that advocates the following:

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- The current and forecast rate of growth in the Western City south warrants a highly conservative approach to corridor protection.
- In the long term, with trains operating north and east of Campbelltown already at capacity in peak periods, consideration will have to be given to the conversion of the T2 train line between Macarthur, Glenfield and the Sydney CBD to Metro operation. Furthermore, technological innovation will make the interoperability of services between lines an increasingly viable response to demand.
- In contrast, the land that will be required to enable direct services between different rail alignments is a finite resource which must be, at a minimum, protected at the same time as the rest of the SWRLE corridor.
- The corridor protected for the SWRLE should therefore be expanded to allow for the provision of the two "Y-links" shown in Figure 2. These comprise a link between Macquarie Fields and Leppington, and a link between Rossmore and Oran Park north; these are highlighted in boxes (C) and (D) respectively.
- A Macquarie Fields–Leppington Y-link will carry train services directly between Campbelltown CBD and WSA-Aerotropolis. Council advocates not just the protection, but the early provision of this link, as a cost-effective mass transit solution for delivering the crucial workforce between the Campbelltown LGA and the new airport.
- An Oran Park north–Rossmore Y-link will do an equivalent job to the west, carrying direct train services between the South West Growth Area and, via Glenfield, both the Sydney CBD and Campbelltown CBD.
- With the addition of the third Y-link shown in box (B) (at the northern end of the Greater Macarthur Growth Area), a self-contained rail system will service the Western City south, connecting the district's major centres to each other as well as to the Sydney CBD, and enabling a paradigm shift towards the use of a transit by a predominantly car-dependent community.

## 4 Outer Sydney Orbital

Stage 1 of the OSO is proposed by the NSW Government to be located within a 200-330m-wide transport corridor commencing at the M31 at Douglas Park, traversing north to the WSA, and passing through St Marys to Maraylya. The corridor will provide the capacity for an outer orbital motorway (the M9) and a freight rail line, ultimately linking the Illawarra through Western Sydney and on to Newcastle and completely bypassing the Central City and Eastern City of Greater Sydney.

Council's comments on the OSO transport corridor proposal are as follows:

- While the proposed corridor is ostensibly to be protected for the delivery of a major motorway and freight rail line, Council's position is that other transport modes, including passenger rail, should not be restricted from consideration for use within the corridor.
- For the southern end of the OSO as it is currently proposed, urgent consideration should be given to the corridor's extension east from the M31 as far as Appin Road (see box (B) in Figure 2) as part of the stage 1 corridor protection process.
- To delay this would risk significant land use integration opportunities being forfeited, as major development is already being planned for this area. Furthermore, the OSO corridor and its eastward extension should be considered for future passenger rail and thus improved land use planning outcomes for the Greater Macarthur Growth Area.
- The extension of the OSO to Appin Road, south of the Appin town centre, from the M31, could provide a more cost-effective road network solution than the existing proposal to upgrade Appin Road through Campbelltown South to ultimately a width of six lanes. The early provision of this link will also remove significant congestion from the State road network in and around the Campbelltown CBD.
- The alignment of the OSO from Camden through to the M31, must ensure existing important arterial road connectors, such as Menangle Road and the Old Hume Highway, are not cut or diverted as this will result in an indirect but significant adverse impact on the ease of connection between the Southern and Northern parts of the Macarthur Region, and as such, will have an adverse and extremely detrimental impact on the Campbelltown and Camden commercial precincts, jobs, schools, hospitals, university, entertainment, etc., that are heavily patronised by families living south of the OSO corridor. Such a corridor must not disadvantage the families of the Wollondilly Shire and must not be developed in a way that results in an adverse impact on equitable accessibility to education, commercial, health, employment, and entertainment precincts.

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- An OSO extension, coupled with a potential east-west passenger rail corridor from Douglas Park / Wilton to service the Greater Macarthur Growth Area, would reduce road infrastructure upgrade needs through the Campbelltown LGA. Furthermore, retaining Appin Road through Campbelltown South as more of a local road (two to four lanes wide) would also allow for the easier provision of fauna crossings between the Dharawal National Park and Campbelltown South, minimising risks to the regionally important koala population in this area.

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Manoto, B Gilholme, M Chivers, P Lake, B Moroney, W Morrison, B Thompson and G Greiss.

Voting against the Resolution were Nil.

**027** The Motion on being Put was **CARRIED**.

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## **8.2 Exhibition of Greater Macarthur 2040 and Special Infrastructure Levy**

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It was **Moved** Councillor Moroney, **Seconded** Councillor Thompson:

That a copy of this report outlining the major issues identified, be forwarded to the Department of Planning and Environment as Council's formal submission to the Greater Macarthur 2040: An Interim Plan for the Greater Macarthur Growth Area and the Greater Macarthur Special Infrastructure Contribution Plan including:

1. The need for additional east-west koala habitat corridors
2. Provision of viable and effective fauna / koala crossings to link key habitat corridors
3. Specific actions to increase the ratio of local jobs above the current baseline
4. Appin Road to serve a regional arterial and not State road function
5. Greater commitment to early delivery of public transport to new communities
6. Alignment of the Special Infrastructure Contributions levy with the provision of housing diversity.

**028** The Motion on being Put was **CARRIED**.

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## **8.3 Quarterly Legal Status Report 1 October to 30 December 2018**

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It was **Moved** Councillor Hunt, **Seconded** Councillor Chowdhury:

That the information be noted.

**029** The Motion on being Put was **CARRIED**.

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