

Report of Planning and Economy to the Ordinary Meeting of Council held on Monday 15 May 2017

**PE3 – Request to Include Land at Menangle in Greater Macarthur Investigation**

PE3

**Request to Include Land at Menangle in Greater Macarthur Investigation**

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TRIM 8520 & 6814

**EXECUTIVE SUMMARY**

- The purpose of this report is to advise Councillors on a request from the Department of Planning and Environment to comment on a submission from Mirvac to the Department seeking to include additional land within the proposed Greater Macarthur Priority Growth Area.
- Mirvac's proposal is for around 350 residential lots and associated employment uses in Stage 1 and for around 5,000 residential lots in stages 2 and 3.
- The Department of Planning and Environment has not done any community consultation in regard to this proposal.
- Council's comments to the Department need to be made by 18 May 2017.
- Under legislation, a person who makes a relevant planning application or public submission is required to disclose any reportable political donations. The disclosure requirements extends to any person with a financial interest in the application or any associate of the person making a public submission. No disclosure of political donation has been made in association with this application.
- It is recommended that Council object to the inclusion of this proposal within the Greater Macarthur Priority Growth Area.

**REPORT**

**GREATER MACARTHUR INVESTIGATION AREA HISTORY**

In December of 2014 the Department of Planning and Environment released their metropolitan strategy "A Plan for Growing Sydney". This plan which identified a potential new Priority Growth Precinct known as Greater Macarthur that included the Appin and Wilton areas. The maps within the Plan was not clearly defined and there were 2 different versions of the map within the Plan.

In late December, 2014 the Department of Planning and Environment wrote the letter at Attachment 4 to Council inviting Council to participate in investigations into the Macarthur South Investigation Area.

In March, 2015 Council considered a report on the Draft Growth Management Strategy and the Impact of a Plan for Growing Sydney. The minutes of this meeting are at Attachment 5. Of particular relevance are points 3 and 7 of this resolution which say:

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*“3. That it be noted, in relation to the investigation work into the Macarthur South area that Council has yet to establish its position regarding the inclusion or exclusion of certain localities in the potential new Growth Centre.*

*7. That Council advise the Joint Regional Planning Panel of this resolution and suggest that any planning proposal currently being considered by the Panel be deferred pending completion of the investigation study into the Macarthur South area.”*

This point 7 relates to the Station Street Planning Proposal, which is referred to as Stage 1 in the Mirvac Proposal.

During 2015 the 'Macarthur South Investigation Area' became known as the 'Greater Macarthur Investigation Area'.

In September 2015, the Department released the Greater Macarthur Land Release Investigation – Preliminary Strategy and Action Plan (“Preliminary Strategy”). This investigation included the land subject of the current Mirvac proposal and extended from Menangle Park to Appin and Wilton. Two precincts within the investigation area (i.e. Wilton Junction and Mt Gilead/Menangle Park) were identified for future urban release. The Preliminary Strategy and proposed amendments to State Environmental Planning Policy (Sydney Growth Centres) (“Growth Centres SEPP”) were placed on exhibition in late 2015.

Council considered a report on the exhibition material at the 16 November, 2015 Ordinary Meeting. The minutes of this meeting are at Attachment 6 to this report. The Council resolution was lengthy and included the following points of particular relevance to this current proposal:

- *Council write to the JRPP and raise concern about the appropriateness of considering the Station Street Planning Proposal before 2036 given the lack of suitable infrastructure and impending growth in Menangle Park.*
- *Council oppose the land north of Douglas Park being identified as a future industrial site given:*
  - *air quality issues previously identified in the Macarthur Regional Study 1991*
  - *the scenic quality of the area and proximity to the Nepean River*
  - *The isolation from road and rail infrastructure*
  - *The extent of employment lands identified elsewhere in the study area in particular Maldon.*

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- *Council opposes the inclusion of a proposed double lane road from Menangle Park through to Douglas Park, which will need to be constructed over the Nepean River, under a heritage listed rail bridge and through a village that does not have the space to accommodate four lanes and falls within a Landscape Conservation Area. Council opposes the map reference called Douglas Park North.*
- *Council ensure that all heritage reports held in relation to Menangle Village be forwarded to the Department of Planning for their consideration.*
- *Beyond 2036, the Department of Planning investigate growth options consistent with Council's Growth Management Strategy which seeks preservation of agricultural land, biodiversity conservation and rural living through the separation of towns and villages in line with Council's desire for classification as peri-urban.*

On 29 July, 2016 the then Minister for Planning, Rob Stokes made the following announcement:

- (a) *The Growth Centres SEPP has been amended to include Wilton New Town as a Priority Growth Area.*
- (b) *The Mt Gilead/Menangle Park precinct has been expanded to included West Appin and the Glenfield to Macarthur Corridor for re-exhibition purposes.*

A copy of the revised precinct referred to as the Greater Macarthur Priority Growth Area forms Attachment 7 to this report. It is noted that Menangle is outside the mapped priority growth area.

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The previous Council considered a report on the Greater Macarthur Priority Growth Area at their meeting 8 August 2016, where they resolved:

*That the comments relating to the Greater Macarthur Priority Growth Area and draft amendments to State Environmental Planning Policy (Sydney Growth Centres) outlined in this report and summarised below be forwarded to the NSW Department of Planning for their consideration:*

- *Given the land supply is likely to meet the housing demand well beyond 2036, West Appin should not be included as a Priority Growth Area. Beyond 2036, the Department of Planning investigate growth options consistent with Councils Growth Management Strategy which seeks the preservation of agricultural land, biodiversity conservation and rural living through the separation of towns and villages in line with Council's desire for classification as a peri urban area.*
- *The inclusion of Appin West with 18,000 dwelling capacity contravenes the Department of Planning's comments that Wilton Junction promises to be ".....distinctly anti-sprawl in its aesthetic" (Page 37 of PE1 – Council Agenda). It is the view of this Council that the inclusion of Appin West will in effect become urban in-fill between Wilton Junction and Campbelltown, markedly increasing Sydney's urban sprawl footprint.*
- *Funding priority should be given to other priorities in the road network for Appin, prior to any funding commitment to the additional east-west link connecting Appin Road to the Hume Highway.*
- *The upgrade of Appin Road between Appin village and Campbelltown and completion of the Appin Bypass should be undertaken in association with land release at Mt Gilead and Menangle Park.*
- *Any benefit which flows to Appin village in terms of negotiated Voluntary Planning Agreements and/or Special Infrastructure Contributions for land release should extend beyond road upgrades and address utility and social infrastructure needs.*
- *Greater strategic direction is required in relation to the assessment of existing planning currently before Council and the Joint Regional Planning Panel.*

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- *In relation to the Consultation Update (June 2016), Council express concern regarding the ‘request for inclusion map’ which extends well beyond the property boundary of the developer seeking to be included in the investigation area for Greater Macarthur Priority Growth Area.*
- *Whilst there has been an increase in the time for submissions we note our concerns regarding the timing of this is poor in relation to the local government elections caretaker mode.*

Council most recently considered the Greater Macarthur Priority Growth Area at its meeting on 17 October 2016. The report presented to this meeting was to provide the newly elected Council the opportunity to consider the Greater Macarthur Priority Growth Area. At this meeting it was resolved:

1. *That Council reaffirm the comments relating to the Greater Macarthur Priority Growth Area and draft amendments to State Environmental Planning Policy (Sydney Growth Centres) as resolved at the Council meeting on 8 August 2016 and attached to this report.*
2. *That Council request staging priority be given to locations within the Growth Centre that are supported by adequate public transport provision either existing or planned. For example priority should be given to development adjacent to Railway Stations in the Glenfield to Macarthur Corridor over sites distant of Railway stations.*
3. *That no development south of Rosemeadow should be undertaken prior to the upgrade of Appin Rd and the provision of a by-pass for the existing Appin Village.*
4. *That a subsequent submission be sent to the Department of Planning outlining any additional comments from Council if required.*
5. *That another road and transport link between Camden and Campbelltown be highlighted as a major priority.*

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West Appin High Level Infrastructure Investigation

At its meeting of 19 May 2014 Council considered a report addressing (i) the impact of including the land west of the Nepean River into the West Appin Precinct Area in respect to rural uses and landscape protection, threatened ecological communities and its proximity to the Nepean River and riparian corridors and (ii) the environmental attributes at a high level.

Council subsequently resolved as follows:

1. *That the information contained in this report be received.*
2. *That Council write to the NSW Department of Planning & Environment:*
  - (i) *Advising that Council does not support the inclusion or consideration of any land west of the Nepean River – including the land comprised in the Planning Proposal for employment lands at Moreton Park Road, Menangle – as part of the high level infrastructure investigation currently being undertaken for a potential West Appin Masterplan.*
  - (ii) *Requesting that the land west of the Nepean River be removed from the investigation area referred to by the Terms of Reference for Proponent Submission for the West Appin High Level Strategic Infrastructure Investigation, issued by the Department to Walker Corporation and dated 23 December 2013.*
3. *That Walker Corporation (on behalf of the West Appin proponents), the proponents for the Planning Proposal for employment lands at Moreton Park Road, Menangle and the Sydney West Joint Regional Planning Panel be advised of the above.*

**MIRVAC PROPOSAL**

**Stage 1 - Station Street**

Stage 1 of the Mirvac Proposal is the site of a current planning proposal in Station Street, Menangle. The Sydney South West Planning Panel is the relevant planning authority for this planning proposal, taking over from the Sydney West Joint Regional Planning Panel in November 2016 when the Draft South West District Plan was placed on public exhibition.

This proposal seeks to rezone land at Menangle as identified in Attachment 6 to this report. This will enable the construction of approximately 350 dwellings, and includes the adaptive re-use of important heritage buildings on the land and a 1 hectare business zone adjoining the railway station.

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There appears little point including this proposal within the Greater Macarthur Priority Growth Area. This proposal is already well advanced through its own planning process and the inclusion of this proposal in the priority growth area will not alter this situation. The planning merit assessment of this proposal can be made without inclusion in the Greater Macarthur Priority Growth Area.

It is noted that the Station Street proposal will be the subject of a report to Council soon in regard to potential changes to the Wollondilly Development Control Plan, 2016 and in regard to a potential Voluntary Planning Agreement. Currently staff are waiting on additional information in regard to these 2 matters.

**Stages 2 & 3 - Around 5,000 Residential Lots**

This is a new proposal that has not previously been considered by Council.

The submission (Attachment 2) made by Mirvac is limited in detail, reflective of it being a submission to a high level investigation. The submission heavily relies on comments made in the Greater Macarthur Land Release Investigation.

The submission at Attachment 2 does not make reference to the views of Wollondilly Council expressed through previous resolutions. The submission does not appear to give any detailed consideration to the Menangle Landscape Conservation Area. While there is an attached heritage report from AECOM that mentions the Landscape Conservation Area, that is all it does. The report does not include any assessment of the impacts of replacing the rural environment with houses and how that would affect the heritage significance of the landscape conservation area. The AECOM report does not make any recommendations to address the landscape conservation area.

The submission at Attachment 2 includes the following statement: "Limited existing surrounding road infrastructure upgrades are required." This statement is not backed up by any studies.

The details provided do indicate that "the site has absolute frontage to the foreshore of the River to be activated and enhanced". The submission does not consider the scenic protection areas identified under Sydney Regional Environmental Plan 20 - Hawkesbury Nepean River.

Council staff met with representatives of Mirvac on 31 March, 2017. At this meeting Council staff articulated some of their concerns with the submission, particularly in regard to the Stage 2 and 3 proposal. In response Mirvac provided the additional information that can be found at Attachment 3 to this report. The following is commentary on key issues related to the Stage 2 and 3 proposal.

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Growth Management Strategy (GMS) 2011

The Stage 2 and 3 proposal is completely inconsistent with the Wollondilly GMS 2011 in that:

- It is not identified on the Structure Plan for Menangle
- It is far in excess of the Housing Target for the Macarthur South area identified in the strategy. The housing target for this area within the strategy will be achieved by developments already approved, including Durham Green, Bingara Gorge and North Appin. The development at Wilton, an identified priority growth area, will mean that the growth targets for Macarthur South are well exceeded.
- The proposal is inconsistent with the position on Macarthur South discussed in the GMS.

Housing Supply

The Draft South West District Plan identifies a 5 year housing target for Wollondilly of 1,550 dwellings. No longer term targets are provided. Existing approved developments will easily result in the achievement of this target. As housing supply in Wollondilly is not an issue, and all other Councils in the South West District are also confident of achieving their housing targets, there would need to be significant strategic advantage to a site that has not already been identified in a planning strategy for it to be considered.

For the subject site, an investigation of relevant issues not only fails to find any strategic advantage, it uncovers several reasons why development of this stage 2 and 3 proposal is undesirable, as discussed below.

How Many Lots?

The stage 2 and 3 proposal is described in Attachment 2 as being for "approximately 5,000 residential lots based on an assumed density of 15 dwellings per hectare".

The plan "Gross Developable Area" appears twice in attachment 2, once with the logo EMM and once with the logo AECOM. This plan identifies the site as having a total area of 577.7 hectares. Of this, 130 hectares is removed from the gross developable land, presumably mainly due to flood and vegetation constraints leaving a net developable area of 447.7 hectares. In response to Council's questions additional information at Attachment 3 suggests the area of open space may "potentially equate up to 230 hectares" and refers to an annexure without surveyed sizes.



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This leaves the total development yield unclear. If the proposal is for 447.7 hectares as indicated in Attachment 2, then at 15 dwellings per hectare the actual yield would be about 6,700 dwellings. One of the differences between the plans in the 2 Mirvac submissions is the addition of the heavily vegetated Lot 3 and 4 DP 248225 to the more recent plan as 'public open space. Even if the maximum possible open space is achieved as detailed in Attachment 3, the likely yield is well in excess of 5,000 dwellings.

Heritage Conservation Area

A significant part of the Stage 2 proposal is within the Menangle Landscape Conservation Area, as can be seen in Attachments 3 and 8. The initial submission did not address this in any detail. A more detailed response is provided in Attachment 3 which in summary notes that there are no controls in Wollondilly Development Control Plan 2016 for the Heritage Conservation Area that the proposal is not inconsistent with any LEP controls and clause 5.10(b) of the LEP relates to requirements "prior to issuing a development consent". It is further considered in the report that much of the conservation area would be retained as open space.

The concept structure plan in Attachment 3 to this report however, identified significant areas of proposed R2 zoning in the area covered by the Landscape Conservation Area.

It is agreed that the clauses in the LEP are aimed at the development consent stage.

In Wollondilly there are existing approvals in place sufficient to achieve dwelling targets and other significant planning proposals in progress and planning work occurring within declared growth areas to achieve long term housing supply. In this environment, it is difficult to support any incursion of residential development on this scale into the landscape conservation area, particularly where that development is not identified in Council's Growth Management Strategy.

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Scenic Protection

The site includes land within the Scenic Protection Area identified along the Nepean River under the Sydney Regional Environmental Plan No. 20 - Hawkesbury Nepean River. This plan in particular provides the following additional matter for consideration by a consent authority for such land:

*The need to prevent large scale, high density or visually intrusive development on waterfront land or on slopes and ridgetops which are visible from the River or the surrounding visual catchment (this requires consideration of the proposed form and siting of buildings, of the colours and materials used and of landscaping).*

While some of the land referred to above is open space, this issue has not been addressed in the submission. In particular there is no information to identify the "surrounding visual catchment" and therefore no ability to determine whether or not future development would be able to be supported.

Additional to this the proposal is highly visible from the M31 Hume Highway. Attachment 10 to this report is a map which shows in yellow the land visible from the Hume Highway. The preservation of rural views and vistas is an important component of living in Wollondilly and a requirement of the Draft South West District Plan. This is especially so at Menangle with the riverine scenic corridor and the landscape conservation area. The replacement of this rural heritage landscape with housing would significantly impact the rural feel of Menangle and the rural entrance to Sydney from the south west.

Draft District Plan

The information provided in Attachment 3 provides a detailed response to the Draft District Plan, including housing supply, productivity priorities, liveability priorities and sustainability priorities.

Unfortunately the submission does not address the plan in respect of how it applies to the Metropolitan Rural Area. The site is entirely located within the metropolitan rural area. Sustainability Priority 6 in the draft South West District Plan is "Discourage urban development in the Metropolitan Rural Area" and goes on to say that relevant planning authorities should not support planning proposal affecting land currently within an RU (rural) zone or E (environmental) zone unless they are identified in a regional or district plan as urban investigation areas or have been identified under sustainability priorities 7 and 8. Neither of these situations apply to this site which is outside the current boundary of the Greater Macarthur Priority Growth Area.

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Investigation and Consultation

Development at Wilton was supported by Council after lengthy planning work and investigation, community consultation and expert advice. The level of documentation provided for Wilton was substantial and involved master planning. As a result of significant investigation and specialist studies, and after years of work and consideration, Council was supportive of the inclusion of Wilton within a priority growth area.

No such detailed investigation or community consultation has occurred in regard to this site.

Poultry Farm

The poultry farm at Appin has been identified in the Draft South West District Plan as part of an agricultural cluster at Appin. This 'poultry cluster' at Appin was also identified in the original Greater Macarthur Land Release Investigation.

The land containing this poultry cluster is literally just across the river from the Stage 2 and 3 proposal. This can be clearly seen on the proponents plans, e.g. the 'gross developable area' plan in Attachment 2 to this report.

The south easterly wind is a very common wind at Appin and would blow from this poultry farm towards the proposed development.

No information has been provided to demonstrate that future residents would not be subject to odours from the poultry farm.

Loss of Agricultural Land

The NSW Agricultural Land Classification Atlas identifies some high class agricultural land within the proposal site.

The loss of high class agricultural land for a proposal that has not been identified in Council's Growth Management Strategy is not supported.

Lack of connectivity - Rail

The proposal includes statements alluding to the suitability of the site due to its proximity to the Menangle Railway Station.

The difficulty with this is that the southern extremities of the site are 4km in a straight line from Menangle Railway Station. Almost all of the stage 2 and 3 proposal is more than 800m, standard accepted walking distance from the Railway Station.

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The Railway Station itself has significant limitations. The platform length is only suitable for 2 carriages. This may support a small village, but not a new town of more than 15,000 people. Any expansion of the Railway Station is constrained by its listing on the State Heritage Register and by the lack of any commuter car parking.

The majority of the Stage 2 and 3 proposal is not well connected to public transport and therefore fails to meet the liveability criteria promoted in the South West District Plan.

Road Infrastructure

The original submission at Attachment 2 makes the following claim (page 5):

*'Limited existing surrounding road infrastructure upgrades are required'.*

In response to concerns raised by Council officers, a more detailed response was provided and can be seen in Attachment 3. This response acknowledges upgrades required at the intersection of Station Street, Menangle with Menangle Road and Woodbridge Road, at the intersection of Station Street and Moreton Park Road and at a new intersection on Menangle Road north of Station Street.

The rest of the further information refers to potential upgrades of State Roads which will be funded through special infrastructure contribution schemes (SICs) with the State Government.

This response does not acknowledge that Menangle Road south of the Nepean River is not a State Road. It does not acknowledge that there would be an impact on other local roads like:

- Woodbridge Road and Finns Road to gain access to Camden, Narellan and the South West Growth Centre.
- Menangle Road to gain access to Douglas Park and the Southern Highlands via Picton Road.
- Moreton Park Road and Douglas Park Drive which is the shortest route to Wollongong.

There is no information in the Mirvac submission to identify potential local road infrastructure shortfalls and no commitment to upgrading any of these roads. Without an understanding of whether or not the proposal will result in the capacity of these roads being exceeded, it is not possible to recommend support to this proposal.

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Multiple Fronts to Development

Wollondilly Council has supported large scale urban development at Wilton for reasons including that it will lead to greater local provision of higher order goods and services. The development on a large scale in other nearby locations, like Menangle or Appin, could dilute the targeted growth at Wilton and work against the achievement of Council and the communities objectives in this regard.

Other Potential Land Uses

Given that there are no current high level strategic documents supporting the urban development of this site, it is also appropriate to consider the sites long term potential uses.

There was a previous proposal for use of some of the land in the Stage 2 and 3 Mirvac proposal for an inland railport, taking advantage of the proximity of the main southern railway and M31 to each other. This proposal was not supported by Council and was also not supported by the Sydney West Joint Regional Planning Panel at their meeting on 27 March, 2014. A copy of the minutes of the panel meeting is at Attachment 11 to this report. In summary, the reasons for their decision were:

- 1. The panel has considered the planning proposal, and at this stage considers the planning proposal to be premature in the absence of more detailed strategic analysis of the framework for development of Macarthur South, including employment, housing, infrastructure and transport arrangements.*
- 2. Any investigation should be undertaken in conjunction and aligned with the investigations already underway in the Macarthur South area. In particular, the boundaries of the West Appin Investigation Area should be amended to incorporate the subject lands proposed for employment purposes.*
- 3. For the above reasons, the panel unanimously recommends the proposal should not proceed to gateway determination.*

That further investigation of Macarthur South, occurred, as detailed in this report. The outcome of that investigation was that this site was not included in the proposed Greater Macarthur priority growth area. No information has been provided that justifies a change to this position. If the site was included for predominantly residential development now, then this would preclude potential strategic employment uses of this site which may potentially be required for long term planning, ie beyond 2056.

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Draft Community Strategic Plan

The proposal is inconsistent with Council's position on growth outlined in the draft Community Strategic Plan.

**CONSULTATION**

This report is the response to the Department of Planning and Environment's 'consultation' with Council. They have not arranged any consultation on this particular proposal.

Council has received a petition to 'save Menangle'. This petition relates to the proposal for 350 lots and employment uses in Station Street, Menangle. Given the terms of that petition, it is unlikely that the community of Menangle would be supportive of this proposal.

**FINANCIAL IMPLICATIONS**

No funding has been allocated for this project/item. This report was able to be prepared with existing staff resources.

The short time frame for comments has prevented any detailed assessment of the potential impacts of this proposal on Council's adopted budget or draft developer contributions plan.

Haphazard land use planning has the potential to be significantly detrimental to Council's long term financial planning and will influence the ability to deliver appropriate infrastructure at the right time for development. This proposal is not consistent with any current long term planning strategy.

**ATTACHMENTS INCLUDED IN A SEPARATE BOOKLET**

1. Letter from Department of Planning and Environment requesting comments
2. Mirvac Submission
3. Additional Mirvac Information provided 5 April 2017
4. Letter from Department of Planning 22 December 2014
5. Council minutes from 16 March 2015
6. Council minutes from 16 November 2015 in relation to Greater Macarthur Investigation
7. Revised (now current) map of Greater Macarthur
8. Map of Menangle Landscape Conservation Area from Council meeting agenda August 2013
9. Map showing proposed zones for Station Street Planning Proposal
10. Map from Wollondilly Vision 2025 showing land visible from M31
11. Record of decision – Sydney West Joint Regional Planning Panel – 27 March 2014

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**RECOMMENDATION**

1. That Council advise the Department of Planning and Environment that it does not support the inclusion of the stage 1 Mirvac proposal in the Greater Macarthur Priority Growth Area as this proposal is already well advanced through its own assessment process.
2. That Council advise the Department of Planning and Environment that it does not support the inclusion of stage 2 and 3 of the Mirvac proposal in the Greater Macarthur Priority Growth Area as.
  - The proposal is inconsistent with Council's Draft Community Strategic Plan.
  - The proposal would have an unreasonable and unsatisfactory impact on the Menangle Landscape Conservation Area.
  - The proposal is contrary to Council's Growth Management Strategy.
  - The proposal is contrary to the South West District Plan, particularly in regard to its strategies for the metropolitan rural area.
  - The proposal would be highly visible to the M31 Hume Highway and dramatically alter the scenic vistas from the Highway for visitors to Sydney.
  - The proposal is contrary to Sydney Regional Environmental Plan No. 20 - Hawkesbury Nepean River which discourages large scale, high density or visually intrusive development on waterfront land or on slopes and ridgetops which are visible from the river or the surrounding visual catchment. Most of the land is within the surrounding visual catchment.
  - The proposal would have a significant impact on agricultural land and potential impacts on the Appin poultry cluster.
  - There is insufficient road infrastructure in place to service this development and insufficient information to determine the level of upgrade required.
  - The site is elongated, and the distance from much of the site to Menangle Railway Station means that residents would still be car dependant. There are also concerns about the ability of the Heritage listed Menangle Railway Station to be upgraded to cater for increased patronage.
  - There has not been any detailed planning or environmental studies to support the proposal and no master planning exercise has been undertaken.

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- Having multiple large scale development fronts in a peri-urban area could detract from the communities goals of getting higher order goods and services through significant urban growth in the Wilton Priority Growth Area.
- Wollondilly is able to achieve its housing targets through other sites already approved. There is planning work being undertaken on proposals consistent with Council's Growth Management Strategy and within the declared Wilton Priority Growth Area that ensure that Wollondilly's share of housing supply will be achieved in the short, medium and longer terms.
- The proposal is inconsistent with previous Council resolutions which were informed by reports to Council and community views.
- There is no evidence to demonstrate that the best strategic long term use of the land is for residential purposes. The best long term strategic use of the land is for agricultural purposes, and if urban uses are required in the long term, then it is more likely that employment uses rather than residential uses are the best use of this land, due to the proximity of the railway and freeway to each other in this location.