

Submission by Wollondilly Shire Council

# Draft Wilton Interim Land Use and Infrastructure Implementation Plan

As exhibited by NSW Department of Planning & Environment (May 2017)

September 2017

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## 1 BACKGROUND

The NSW Government's Potential Homesites Program in 2011 called for expressions of interest from landowners with sites of more than 100 hectares which could deliver houses quickly to the market. The program identified eleven (11) investigation sites across the Shire for potential housing development.

Out of these projects, there were three (3) that were located within good proximity to Wilton village which Council determined had merit and would be form the basis of a masterplan developed jointly by the three landowners.

Council resolved to write to the then Minister for Planning and advise that Council and the proponents of these three (3) proposals would jointly develop a masterplan to:

- Deliver a new town at Wilton to provide housing, employment, all supporting infrastructure and services, and a full range of complimentary land uses to support liveability and sustainability
- Provide an overall structure and staging plan
- Identified all infrastructure requirements and an infrastructure funding strategy, to ensure timely and cost-effective delivery of all infrastructure

Council worked with the proponents who prepared a high level masterplan and two rounds of community consultation were undertaken over the following 6 months. Subsequently, Council, at its meeting of 17 December 2012, resolved to 'support in principle' the high level master plan.

Amongst a number of matters, Council's support of the master plan was conditional on the following:

- The inclusion of land west of the study area along Wilton Park Road in the master plan
- The NSW Government coordinating the rezoning and state infrastructure agencies and resolution of mining related issues
- Identifying designs and funding for the upgrade of Picton Road and the Hume Highway to accommodate the development
- Creating 1 job for each lot created through the master plan
- The NSW Government building a new hospital to service the new town and the broader Shire
- A number of issues relating to flora and fauna and indigenous heritage be investigated in the master plan process

Council wrote to the Minister for Planning in January 2013 to inform the Minister of Council's support for the Wilton new town project. Council also requested that the NSW Government coordinate the statutory planning process to implement the draft high level master plan with Council's ongoing involvement.

The NSW Department of Planning and Environment agreed to work with Council on the project and a steering committee was established which first met on 16 January 2013. At this meeting, the Director - General of DPE outlined a planning pathway which involved a draft State Environmental Planning Policy similar to other 'Urban Activation Precincts'. This was subject to

infrastructure requirements and a State Infrastructure Levy being developed and approved by Cabinet in addition to mining co-existence issues being resolved.

Over the following four years, Council, DPE and the proponents continued to work collaboratively on a single SEPP-based rezoning and Land Use and Infrastructure Strategy.

On 9 August 2017, Council received notification from the DPE that a draft ILUIIP and a rezoning proposal for Walker Corporation's landholdings at Wilton South East Precinct were on public exhibition from 5 August 2017 until 20 September 2017.

While the opening of the ILUIIP to community consultation is welcomed, Council does not support any land being rezoned ahead of the finalisation of a robust planning framework. This framework must demonstrate that all necessary infrastructure and local employment opportunities will be delivered. This position has been reinforced by several resolutions of Council which in turn have been explicitly conveyed to DPE staff both in writing and at numerous meetings.

So concerned with the lack of progress to finalise a robust planning framework to inform land use decisions, Council wrote to the former NSW Minister for Planning on 3 November 2016 requesting an urgent meeting.

Further, in June 2017, Council released its "Wilton New Town and Great New Town or No Town at All" advocacy paper to highlight Council's concerns with the planning process to date.

The draft ILUIIP does not address Council's concerns and fails to demonstrate high achievement in key areas that modern planning practices consider critical to ensuring healthy and prosperous communities.

## **2 PLANNING FRAMEWORK**

Council expects that the Wilton Priority Growth Area (WPGA) will demonstrate best practice principles for urban design and integrated land use and transport planning. This is considered to be critical to ensuring a healthy, vibrant and prosperous new community.

Accordingly, there is a need to establish a robust planning framework that provides for local precinct planning to be undertaken prior to any development consent being granted by council.

The following figure found on page 3 of the ILUIIP illustrates the progress of the WPGA which includes "Precinct Plans". This is positive as Council has long advocated for the need to masterplan the WPGA in a coordinated manner. However, the ILUIIP contains only limited direction on how this process will be implemented.

Figure 1: Excerpt from ILUIIP on process



The ILUIIP states that “Major landowners will prepare precinct plans in consultation with the Department and Wollondilly Shire Council” and that a “streamlined rezoning and precinct planning processes piloted in Wilton with the focus of delivering housing, jobs and infrastructure sooner”.

This statement is ambiguous for a number of reasons as follows:

- Precinct planning will be required for all landowners in the WPGA, not simply the ‘major landowners’ given the absence of a detailed structure plan as would usually be the case.
- Council are best placed to manage local planning matters including assessment of precinct plans and community consultation. These would be lodged by developers and adopted by Council before being referred to the Department for final approval.
- The focus of precinct planning is to better align the release of new housing with infrastructure delivery to ensure better planning outcomes. Council has an ample supply of housing to meet its target established in the South West District Plan.
- Precinct planning as a process is best undertaken at the local level in conjunction with development assessment. It is a superior alternative to the preparation of complex development control plans made in isolation which can frustrate the timely approval of housing and employment.

The ILUIIP states that “Development and subdivisions would only occur once detailed precinct plans have been prepared and assessed to show how the strategic planning and infrastructure requirements in the Land Use and Infrastructure Implementation Plan have been included in the new development”.

This statement is strongly supported by Council and is consistent with the Council’s preferred approach to precinct planning outlined above.

The Metropolitan Strategy and the draft South West District Plan are high level strategic plans which set the general direction for release of land in the region. The planning proposal rightly

highlights the many actions contained within both strategies yet does not expressly assess their proposal against these objectives. The proposal while stating that it is consistent with the actions needs to directly respond to each action and demonstrate consistency in each instance.

The ILUIIP as exhibited is perfunctory in that it has not addressed important threshold issues including passenger rail transport, health and education infrastructure delivery. No strategy for the timing and delivery of critical infrastructure aligned with housing supply is contained within the ILUIIP. The ILUIIP will need to contain the Structure Plan for the Wilton Priority Growth Area which includes West Wilton and the local precinct planning approvals framework by which future development will be assessed. The ILUIIP and land rezoning via the SEPP remain the responsibilities of the DPE. However, local planning matters including precinct plans, development control plans, Section 94 plans and voluntary planning agreements are not the domain of the State and must remain with Council.

Likewise, there is no draft Section 117 Direction made available to assess the consistency of the proposal with the strategic planning framework. Further, the strategic planning framework has not yet been opened to public scrutiny and adopted by the NSW Government or Wollondilly Shire Council. This raises potential governance and probity issues.

All documentation needs to be updated and reflect the endorsed masterplan or draft ILUIIP for consistency and transparency. Council does not support the public exhibition of any documentation that does not accurately reflect the endorsed masterplan and subsequent ILUIIP. It is of critical importance to Council that all documentation is clear and consistent and illustrates endorsed masterplans supported by Government and Council.

### **Recommendation**

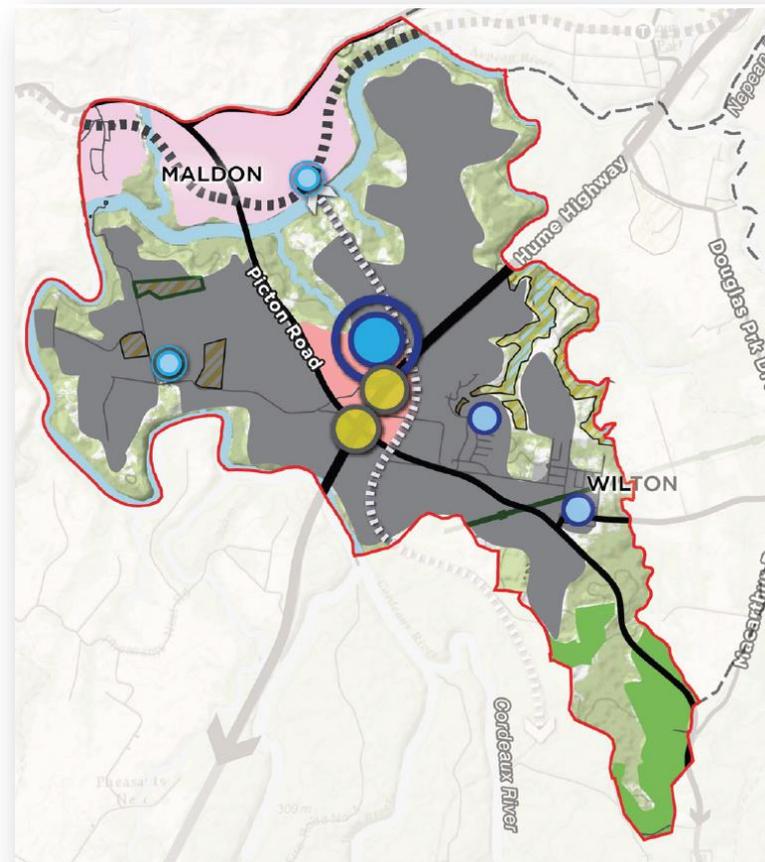
- That the ILUIIP be amended to outline a process for precinct plans to be lodged with Council by all proponents across the WPGA. This process would include community consultation and adoption by Council. Once adopted the precinct plan would be referred to the Department for final approval. Once approved by the Department, Council would be able to issue consent for a development application.
- A draft Section 117 Direction be re-exhibited with the revised ILUIIP to clarify the mechanism that would give statutory weight to the ILUIIP and corresponding precinct plan.

## **3 HOUSING**

The NSW Department of Planning and Environment's *Preliminary Strategy & Action Plan- Greater Macarthur Land Release* undertook investigated the environmental, agricultural and resources value of land in Greater Macarthur, including constraints such as flooding and air quality.

The outcome of this investigation was that the Wilton Priority Growth Area contained approximately 2,800 hectares of urban capable land and capacity for approximately 16,600 additional dwellings.

Figure 2: Wilton Structure Plan from Greater Macarthur Preliminary Strategy & Action Plan



The draft ILUIIP and supporting *Background Analysis Report* contradict one another with the later projecting that 15,000 new homes or 40,000 people will be delivered over the next 20 to 30 years. The Draft ILUIIP on the other hand forecasts 50,000.

### **Occupancy Rate (Average number of people per dwelling)**

The population projection (40,000) and dwelling yield (15,000) forecasts in the Background Analysis Report equates to a dwelling occupancy rate of 2.67 people per dwelling.

Census (2016) indicates that the occupancy rate across the Wollondilly Shire is 2.99 while the Greater Sydney is 2.72. This shows that the current occupancy rate is markedly higher than the rate implied in the Background Analysis Report and therefore the forecast population of the Wilton PGA is underestimated.

Furthermore, greenfields release areas commonly have higher occupancy rates than established suburbs owing to the higher proportions of families that settle in these areas. The following figure compares the occupancy rate of a number of greenfields release areas across Sydney and shows an average occupancy rate of 3.33.

Figure 3: Dwelling occupancy rates in Sydney's greenfield release areas

| State Suburb     | Occupancy Rate |
|------------------|----------------|
| Edmondson Park   | 3.7            |
| The Ponds        | 3.5            |
| Harrington Park  | 3.5            |
| Kellyville Ridge | 3.5            |
| Rouse Hill       | 3.4            |
| Colebee          | 3.4            |
| Middleton Grange | 3.4            |
| Kellyville       | 3.4            |
| Oran Park        | 3.2            |
| Ropes Crossing   | 3.2            |
| Jordan Springs   | 3.2            |
| Glenmore Park    | 3.2            |
| Gregory Hills    | 3.1            |
| Spring Farm      | 2.9            |
| <b>Average</b>   | <b>3.33</b>    |

Based on comparable greenfields release areas, it is likely that the actual population at full development of the Wilton PGA (based on 15,000 dwellings) will be over 50,000 people.

On this basis the Background Analysis Report should be corrected to reflect the more likely higher population projection.

### **Dwelling Yield and Dwelling Density**

As discussed, the NSW Department of Planning and Environment's *Preliminary Strategy & Action Plan* projected that the Wilton PGA would deliver 16,600 dwellings at full development.

The ILUIIP has revised this yield down to 15,000 dwellings without a clear explanation of what caused this was reduction in dwelling yield. The following figure from the Background Analysis Report identifies the likely yield within the Wilton PGA by precinct.

Figure 4: Excerpt from Background Analysis Report, dwelling yield projections by precinct

| Precinct                 | Potential new homes | Expected Staging    |
|--------------------------|---------------------|---------------------|
| Bingara Gorge            | 1,800               | Under construction  |
| South East Wilton        | 3,500               | First homes by 2018 |
| Wilton Town Centre       | 1,600               | First homes by 2019 |
| North Wilton             | 5,400               | First homes by 2019 |
| West Wilton              | 2,400               | First homes by 2025 |
| Wilton Rural Residential | 50                  | First homes by 2025 |

The dwelling yields projected in the above table contradict the analysis provided by the Department in September 2016 as indicated on the figure 5 (overleaf) which forecast a total of 17,700 dwellings.

Within the Wilton PGA, three rezoning proposals have been lodged which already provide capacity for 19,000 houses. This is due to the Wilton Town Centre precinct proposing 1,550 house sites in the residential zone and a further 770,000m<sup>2</sup> of residential floor space within the mixed use precinct. Accordingly, figure 4 above does not include the potential for up to a further 8,550 residential units that the rezoning proposal provides capacity for (assuming units and apartments are the dominate typology).

In addition, the forecast of 2,400 dwellings in the West Wilton Precinct is highly conservative. Council's analysis based on the density proposed by the Department and other proposal indicates that the ultimate yield may be closer to 3,000 dwellings. On this basis it can be established that the Wilton PGA may have capacity for up to 24,000 dwellings or 72,000 people at full development.

Furthermore, the analysis in figure 5 (overleaf) undertaken by the Department uses a maximum dwelling density of 30 dwellings per hectare (30d/Ha) for land within 1 kilometre of the Wilton Town Centre Precinct. The current planning proposal before government for the Wilton Town Centre Precinct proposes between 40d/Ha and 60d/Ha. This suggests that the earlier (and higher) dwelling projections modelled by the Department is based on unrealistically low dwelling densities.

Furthermore, the earlier modelling assumed dwelling densities of 18d/Ha for land within the South East Precinct and North West Precinct. Again, the planning proposal that are before government are proposing dwelling densities between 25d/Ha and 40d/Ha.

This indicates that the earlier modelling which was based on unrealistically lower dwelling density assumptions would likely far exceed 17,700 dwellings if the actual proposed dwelling densities were remodelled. This would likely support Council’s view that dwelling yields could be closer to 24,000 rather than the 15,000 cited in the draft ILUIIP.

Figure 5: Department of Planning & Environment dwelling yields 2016

| Layer   | Gross Area (ha) | Percentage Developable | Net Dev Area | Density (dw/ha) | New Dwellings |
|---|-----------------|------------------------|--------------|-----------------|---------------|
| Urban Land (Areas 3&4)                            | 101.34          | 65%                    | 65.87        | 30.00           | 1,980         |
| Urban Land (Areas 2,5,6A,7,8,10)                  | 758.26          | 65%                    | 492.87       | 18.00           | 8,870         |
| Urban Land (Areas 1 & 6B)                         | 696.82          | 65%                    | 452.94       | 12.00           | 5,440         |
| Large Lot Rural Residential (Area 12, 0.2dw/Ha)   | 131.31          | 90%                    | 118.18       | 0.25            | 30            |
| Employment Land (within 1km of Centre, Areas 3&4) | 54.46           | 65%                    | 35.40        |                 |               |
| Employment Land (Areas 5, 6A,7 & 10)              | 56.11           | 65%                    | 36.47        |                 |               |
| Employment Land (Maldon)                          | 442.76          | 65%                    | 287.79       |                 |               |
| Urban Centre (Wilton Junction)                    | 18.20           | 65%                    | 11.83        |                 |               |
| Urban Land (Wilton existing township)             | 30.82           |                        |              |                 | 293           |
| Bingara Gorge                                     |                 |                        |              |                 | 1,165         |
| <b>TOTAL</b>                                      | <b>2,290</b>    |                        |              |                 | <b>17,778</b> |

### Dwelling Growth Rate

The development timeframe assumed in the ILUIIP of 20 to 30 years for build out equates to an annual dwelling take up rate of between 500 and 750 homes in the WPGA alone. Over the past 5 years the average annual dwelling take up rate across the entire Wollondilly LGA has only been 296 dwellings. This would require a sustained doubling of housing production over current demand levels over a 20 to 30 year timeframe which is not realistic.

The draft ILUIIP is supported by a *Greater Macarthur Land Release Investigation Area Housing Demand Analysis* prepared by AEC Group and dated May 2016. This report states that:

*“... there is a physical limitation to how many lots can be delivered. Precincts like Edmondson Park, Oran Park and Turner Road (SWGC) delivered approximately 150, 200 and 250 lots respectively per year from 2011-2014.”*

This report also states that:

*“...market demand is influenced not only by GMLRIA-specific characteristics but its competitive position is also underpinned by the relative appeal of comparable residential locations. The GMLRIA is a young and emerging residential location, and is the beneficiary of slower than planned pace of development in SWGC and NWGC.”*

According, there are significant doubts as to whether a long term sustained doubling of dwelling production as proposed in the draft ILUIIP is supported by market demand.

### Implications of Housing Projections

These discrepancies in the dwelling projections are problematic because they are being used by the Department as the basis for calculating state and local infrastructure needs. This would in

turn lead to infrastructure requirements including health, education and public transport being underestimated and therefore ultimately underserving the WPGA.

Council does not support the draft ILUIIP in its current state in light of these issues.

### **Recommendation**

- That the dwelling projections, densities and take up rates be remodelled and the Housing Market Analysis and support infrastructure needs analysis are updated to reflect current proposed assumptions.
- That the ILUIIP and all supporting technical studies are updated to reflect the current development scenarios being considered by Government.
- That the revised ILUIIP and all supporting technical studies be re-exhibited to allow for accurately informed community consultation to be undertaken.

## **4 EMPLOYMENT**

Currently, across the Shire 52.7% of our residents are employed (approximately 25,000 people). If we assume that this percentage is reflected by the incoming population of Wilton which at full development could be approximately 72,000 people (based on current proposals as discussed previously) then the corresponding number of jobs required to avoid making the current local jobs shortfall any worse would be 35,500 jobs over double the target proposed.

The ILUIIP and Background Analysis Report proposes that the Wilton PGA will deliver 15,000 jobs. A *Greater Macarthur Priority Growth Area Future Employment Analysis* prepared by Urbis and dated 21 April 2017 is exhibited in support.

The supporting study states that:

*“At capacity, the GMPGA can provide 35,600 to 36,100 direct full-time, part-time and casual jobs”.*

The study does not confirm whether or not 15,000 jobs can be supported within the Wilton PGA. Likewise, the draft ILUIIP and Background Analysis Report offer no analysis or strategy as to how the 15,000 jobs will be delivered in line with housing growth.

The following figure (overleaf) from the Mt Atkinson Structure Plan prepared by the Victorian Planning Authority demonstrates what a structure plan would normally include in other leading jurisdictions.

As can be observed, each employment generating land use is modelled against industry standard job generating benchmarks. This provides an evidence-based analysis of how the designated employment target or threshold will be achieved. The assumptions can be measured against the proposed floor or land areas and thus allows an objective analysis of whether adequate employment generating land uses are being delivered.

The draft ILUIIP and Background Analysis Report and supporting technical report do not provide any evidence that the 15,000 jobs can be attained or whether any land should be released for housing.

Figure 6: Excerpt from Mt Atkinson Structure Plan (Victorian Planning Authority)

| LAND USE                                    | EMPLOYMENT MEASURE                     | JOBS PER EMPLOYMENT MEASURE | ANTICIPATED QUANTITY OF EACH LAND USE | ANTICIPATED QUANTITY OF JOBS |
|---|--|-----------------------------|---------------------------------------|------------------------------|
| Community centre                            | Jobs per Centre                        | 10                          | 2                                     | 20                           |
| Government primary school                   | Jobs per School                        | 40                          | 2                                     | 80                           |
| Non-government primary school               | Jobs per School                        | 40                          | 1                                     | 40                           |
| Non-government secondary school             | Jobs per School                        | 90                          | 1                                     | 90                           |
| Other community services (medical, NGO etc) | Jobs per 50 m <sup>2</sup> floor space | 0.02                        | 105,000m <sup>2</sup>                 | 2,100                        |
| Retail                                      | Jobs per 30 m <sup>2</sup> floor space | 1                           | 40,000m <sup>2</sup>                  | 915                          |
| Restricted retail                           | Jobs per 100m <sup>2</sup> floor space | 1                           | 40,000 m <sup>2</sup>                 | 400                          |
| Commercial/ mixed use                       | Jobs per 16 m <sup>2</sup> floor space | 1                           | 35,000m <sup>2</sup>                  | 2,190                        |
| Other jobs in commercial/mixed use          | Jobs per 60 m <sup>2</sup> floor space | 1                           | 389,334                               | 6,489                        |
| Industrial employment area                  | Jobs per ha                            | 15                          | 406 ha                                | 6,090                        |
| Home based business                         | Jobs per dwelling                      | 0.05                        | 6,700 dwellings                       | 331                          |
| <b>Total estimated</b>                      |  |                             |                                       | <b>18,745</b>                |

Council has long mandated a minimum job to house ratio of 1:1. The current Shire ratio is 0.8 jobs for every house while the NSW state average is 1.2 job for every house. This is a common problem facing south west Sydney’s growth areas which if not addressed only further diminishes local employment opportunities and leads to higher unemployment and social decline.

The Background Assessment Report proposes that a “proactive development employment and economic advisory board” is established. Council has previously, in correspondence dated 19 June 2017 to the DPE, provided the following response to this concept:

*“The concept of an economic development reference group, while having some merit, only replicates similar bodies already in place such as Council’s Economic Development Advisory Committee (EDAC). While we welcome the Department’s participation with EDAC openly, that alone will not address the Shire’s jobs deficit and cannot substitute the direct investment in employment by the private or public sector.”*

As such, this concept is not supported as an alternative to Council’s position held consistently since 2012 that any development at Wilton must deliver a 1:1 jobs to houses threshold. The reason for this is to address the jobs deficit across the Shire as outlined above and ensure that new residents have access to employment opportunities locally. The DPE has been aware of Council’s position from the outset and in designating Wilton as a Priority Growth Area has accepted responsibility for delivering upon this core objective. Failing to incorporate a

mechanism to ensure that housing supply linked to job creation is an abrogation of this responsibility and jeopardises Council's continuing support for further housing at Wilton.

The proposed economic development strategy will not result in tangible local jobs being created and only serves to abrogate Government's responsibility to align housing delivery with employment growth.

Council does not support new housing unless the ILUIIP identifies a minimum jobs threshold of 1:1 to avoid further reducing the imbalance of resident workers to local jobs.

Council has always stated that its support for Wilton PGA was contingent on the attainment of a 1:1 job to housing target being achieved and a suitable mechanism adopted in the ILUIIP to ensure that.

Imposing a minimum jobs to housing threshold of 1:1 ensures that only as much housing can be delivered as there are jobs available to sustain the incoming population.

### **Recommendation**

- That a supporting Wilton PGA employment analysis be undertaken that clearly establishes by analysis how many jobs are being delivered under the ILUIIP and the likely timing of employment delivery based on market evidence.
- That the ILUIIP be revised to clearly identifies a 1:1 job to housing target to ensure that housing delivery will only be allowed to occur in line with employment generation.
- That the proposed inclusion of land at Maldon be removed from any consideration for employment generating uses unless a land capability assessment is undertaken that addresses, topographical, environmental, access an freight and market constraints.

## **5 TOWN CENTRE RETAIL HIERARCHY**

Council strongly supports the SGS Economics Report prepared in support of the Greater Macarthur Strategy which highlights the challenges to establishing a new Town Centre in a greenfield context. The SGS Report highlights the importance of early establishment of the town centre and ensuring its primacy in the local centres hierarchy ahead of any competing centres. The town centre needs to establish a foothold in the market, gain momentum, achieve critical mass and mature before competing centres are permitted which may detract from its establishment. This is consistent with Council's desired outcome for a single strong viable town centre being established first to ensure its role as an employment and cultural hub.

The draft ILUIIP must reinforce a strong centres hierarchy and restrict development of any competing retail centres until after the consent of the 4,000th lot.

Competition will be encouraged in smaller neighbourhood centres which are intended to provide day-to-day convenience shopping needs at the local neighbourhood level. To achieve this any retail development outside the town centre must be zoned 'neighbourhood centre' and therefore limited to a 'neighbourhood shops' where the retail floor area does not exceed 400 square metres under the LEP.

Analysis undertaken for the Department by Urbis in May 2017 importantly, finds that under the base case housing growth scenario proposed by major developers, if a single full line supermarket were built at either North West Precinct or South East Precinct before 2025, “it could likely delay the timing and delivery of Wilton Town Centre until 2031”.

The analysis also found that if a full line supermarket were built at both the North West and South East Precinct, “it could further delay the delivery of Wilton Town Centre until 2036. The analysis concludes that “...it is difficult to quantify the impact of the North West and South East Precinct retail proposals on the centres hierarchy in the long term”. Based on this statement and the findings that they will have a likely detrimental impact on the viability on the town centre full line supermarkets must be confined to the town centre. This supports the proposal by Governor’s Hill to limit retail floor space outside the town centre to 400 square metres and not introduce these until after 4000 additional lots are delivered.

It should also be noted that there is an existing convenience supermarket at Wilton which was constructed as part of the Bingara Gorge development. This has approval for 465m<sup>2</sup> of supermarket floor space which reflects the lower order nature of the Wilton Plaza.

### **Recommendation**

- The draft ILUIIP is revised to reinforce a strong centres hierarchy and restrict development of any competing retail centres until after the consent of the 4,000th lot.
- The draft ILUIIP restricts retail development outside the town centre to ‘neighbourhood centre’ and therefore limits development to ‘neighbourhood shops’ where the retail floor area does not exceed 400 square metres under the LEP.

## **6 PUBLIC TRANSPORT**

The high level masterplan enforced by Council in 2012 provided for a new town centre located along the potential Maldon-Dombarton railway corridor with traditional retail uses including food liquor and groceries (FLG) and specialty retail. This would lend itself to integration with public domain and streetscape activation that would create a vibrant space for the community with shopping, entertainment and recreation activities. The location of the town centre here is considered optimal in terms of providing opportunity for better vehicle and pedestrian circulation and general amenity.

A critical element to the success of this concept would be the potential for integration the new town centre with heavy rail public transport in the future. Wilton new town is a satellite settlement that will accommodate between 50,000 and 72,000 people over the next 30 years. It is important that access to public transport is provided. This is especially important given that Wilton new town is located over 70 kilometres from the Sydney CBD and 23 kilometres from the nearest major employment centres – Campbelltown and Narellan.

Without access to public transport it is likely that Wilton PGA will evolve as a dormitory, automobile dependent city which has implications for the social and physical health of future residents.

Automobile dependency is defined as high levels of per capita automobile travel, automobile oriented land use patterns, and reduced transport alternatives.

Automobile dependency is a result of 'urban sprawl' type development patterns. These cities are characterised by highly dispersed, low-density suburban areas predominately linked to employment and retail centres by roads and motorways with little alternative public transport modes available. Automobile dependency has been linked to a number of negative impacts including:

- Environmental degradation
- Social exclusion
- Reduced public health
- Economic inefficiency

Chronic diseases have overtaken infectious diseases as the leading causes of ill health in Australia. There is a growing consensus amongst planners and medical professionals that urban sprawl increases in the incidence of chronic diseases by encouraging sedentary lifestyle behaviours that contribute to poor mental and physical health.

A growing body of research suggests there is a positive association between physical activity and urban form. Features of urban areas which are conducive to physical activity include:

- Shorter distances to public transport
- Compact neighbourhood centres with better walkability through density, land use mix and connectivity
- Multiple destinations within walking or cycling distance, such as transport nodes, shops and recreational facilities
- Greater diversity in land use

The Draft ILUIIP identified the following 'transport' upgrades:

- Widening of Picton Road between Pembroke Parade and Almond Street
- Upgrades to the Hume Highway between Picton Road and Narellan Road
- Pembroke Road and Picton Road intersection upgrade western bridge over Picton Road, near Janderra Lane
- New bridge over Picton Road at Almond Street
- Investigate access to Hume Motorway
- Picton Road West and Wilton Park Road intersections.

These are little more than typical road infrastructure upgrades which are necessary to accommodate housing growth but to not represent a strategic approach to integrating land use and transport.

As outlined, there has been a significant up scaling of density across the Wilton PGA which suggests that the area will accommodate between 50,000 and 70,000 people at full development. Population growth of this magnitude necessitates the provision of a passenger rail public transport solution. A train station and passenger rail service must be provided at the town centre along with an integrated bus interchange. The NSW Government must undertake a study into the feasibility of such a transport solution before any land within the Wilton PGA is rezoned. The costs for the delivery of passenger rail infrastructure should form part of a State Infrastructure Contribution Levy and other funding mechanisms such as value capture considered.

A significant shortcoming of the ILUIIP is that the traffic and transport modelling being undertaken by for the NSW Government is not yet finalised. This is one of the most important inputs into the ILUIIP as it establishes the road hierarchy and network including public transport corridors and its integration with land use. It is impossible to fully comment upon the draft ILUIIP and housing yield, density and job generation unless this work is finalised.

An independent review of the current work being undertaken Jacobs by PWC highlighted that:

*“A lack of local jobs means that more residents will need to travel external to the area for work, increasing the overall transport demand and the level of infrastructure required”. This supports Council’s long held view that transport infrastructure has not be adequately planned to service such high levels of housing supply”.*

The PWC review analysed a potential proposed new train station at Maldon on the southern highlands main line. Council does not support this recommended option as this will not adequately service the residential population or assist the long term viability of the town centre. The independent PWC review of the Jacobs transport study in reviewing this option however found that:

*“a density of 42 dwellings per hectare, within 800 metres of a rail station, is typically required to support rail investment. The proposed Wilton development is expected to have a maximum density within catchment of rail (at Maldon) of 18 dwellings per hectare, when fully developed, which is below the threshold that the literature suggests. Furthermore, the proposed Maldon Station is approximately 5km from the Wilton town centre; therefore it will be outside of the typical walking catchment for most users. Users will have to use the bus link (intermediate transit), spur line or drive to the station (Park ‘n’ Ride). This journey transfer will increase travel times and decrease the attractiveness of public transport in comparison to the use of car. We recommend that a more detailed assessment could be undertaken into the feasibility of the SHL electrification and spur line from Maldon to Wilton (using PTPM).”*

It should be noted that the proposed dwelling densities in the Wilton Town Centre Precinct are between 40dw/Ha and 60dw/Ha which is clearly well over the established benchmark upon which passenger rail services are viable. The recommendation of this independent review

should be adopted by the Department as Council has asked for similar outcome since the first transport planning workshops in October 2016.

While it's encouraging that the independent review has echoed Council's requests, it is disappointing that there has been no significant progress on integration of land use and transport planning for Wilton.

Should it be determined that passenger rail services are not feasible then densities across the Wilton PGA would be reduced to deliver not more than 10 dwellings per hectare. This would require a minimum lot size of 700m<sup>2</sup> being adopted to limit dwelling yields to avoid overdevelopment which cannot be adequately serviced considering its 'peri-urban fringe' setting. This is consistent with the strategic directions contained in the Metropolitan Strategy and Draft District Plan.

### **Recommendation**

- The draft ILUIIP is revised to include the finding of the Jacobs traffic and transport study and PWC review
- That the PWC review be revised to model the feasibility of a new rail spur and train station at the Wilton Town Centre Precinct as recommended in the PWC independent review.
- That the revised ILUIIP and all supporting technical studies be re-exhibited to allow for accurately informed community consultation to be undertaken.

## **7 HEALTH AND EDUCATION**

The Draft ILUIIP does not provide a clear plan for how health and education services will be delivered in-line with housing delivery.

The ILUIIP states that "major landowners will support the provision of social infrastructure as well as providing sites for schools and health facilities". This is not evident in the ILUIIP as there is no threshold provided to given certainty that housing supply will be serviced with appropriate health and education services over time.

The ILUIIP also states that "infrastructure planned for Wilton includes...new primary schools in each precinct and a high school near the town centre". The ILUIIP however does not establish clear threshold by which planned infrastructure will be required. Only in June this year the NSW Government announced in the budget planning for a single new school at Wilton. There is no certainty as to when this facility will be delivered.

Likewise, the ILUIPP states that "planning for Integrated Health Centre to begin in 2018 in consultation with Council and NSW Health". This fails to provide any certainty over the size a scale of such a facility to adequately service the incoming population.

At present, a 2.2 hectare site has been identified near the Wilton town centre however, integrated health care facilities providing care across all tiers of health from local clinics, specialists to hospital facilities typically require sites between 4-10 hectares.

Council has long maintained a strong position that it is not acceptable for a town the size of Wilton to access hospital services over 20 kilometres away at Campbelltown or 30 kilometres to the Southern Highlands or Wollongong.

The ILUIP must clearly establish the need to a hospital site and outline thresholds for expansion of service delivery in-line with anticipated growth. This requires a suitable portion of land of between 6-10 hectares in close proximity to the town centre and future passenger railway station.

### **Recommendation**

- That the draft ILUIP is revised to include re-examine the health and education needs of the Wilton PGA having regard to the likely projected housing growth within the Wilton PGA and adjoining Macarthur Priority Precincts.
- That the draft ILUIP establishes clear housing delivery thresholds that trigger the need for certain levels of service provision to align housing delivery with infrastructure delivery.

## **8 HOUSING CHOICE AND AFFORDABILITY**

Council has prepared a Social Planning Strategy (adopted Nov 2016) which has identified that the current homogenous stock of traditional detached forms of housing as a risk to affordability across the Shire. The masterplanned approach to Wilton is a strategic opportunity to set appropriate targets for a mix of housing typologies that provide affordable choices for first home buyers and low income households with equitable access to local services and amenities.

A report prepared by MacroPlan Dimasi dated May 2014 states that greenfield areas typically exhibit a preference for detached dwelling stock versus townhouses, villas apartments etc. It is proposed that across the masterplanned area, 84% of all dwelling stock will be of a detached nature. Council does not support adoption of such high proportion of detached dwelling stock without a supporting strategy that demonstrates that adequate affordable and lifestyle housing choices are being provided.

Council does not support this approach and emphasises that the masterplanned approach provides the most appropriate mechanism to plan for a mix of housing typologies and implement those through the land zone and minimum lot size map in Wollondilly LEP 2011.

Targets for retirement living and aged care should be identified in the ILUIP. There is reference to employment being generated by aged care but no plan in the proposal which identifies locations of such facilities or the number of units which should be provided to accommodate this important demographic. As yet there is no way to assess whether sufficient provision of aged care and retirement living are being provided.

Affordable housing has not been adequately considered as part of the ILUIP. Council expects that the ILUIP will set appropriate targets and principles to require adequate provision of affordable housing. The ILUIP should be informed by the Draft South West District Plan and Council's Social Planning Strategy (adopted Nov 2016).

It should be noted that the Wilton Town Centre Precinct should contain a significant portion of housing for low income and moderate income households given its potential for excellent access to public transport, health care, education and employment.

### **Recommendation**

- That the ILUIIP provide further guidance and requirements for adoption of principles to support a range of housing choices but in the right locations.
- That the ILUIIP establishes clear targets to support a greater mix of housing types and choices to accommodate a range of segments of the market. This is an important consideration intended to ensure that affordable housing choices are provided and cater for a broader demographic.
- That the ILUIIP establishes a clear threshold for provision of affordable housing for low to medium income earners.

## **9 BIODIVERSITY**

There is not enough direction on how the Wilton PGA will response to environmental issues including the heat island affect and climate change. It is expected that the ILUIIP would establish clear reponses to reduce energy consumption and promote reduce emissions.