

Our Reference: TRIM 9456

Ms Carolyn McNally
Secretary
NSW Department of Planning & Environment
GPO Box 39
Sydney NSW 2001

6 October 2017

Dear Ms McNally

SUBMISSION – WILTON PRIORITY GROWTH AREA – SOUTH EAST PRECINCT

Thank you for inviting submissions to the above rezoning proposal. At its meeting of 21 August 2017 Council, resolved (in part) as follows:

- 1. That Council makes a submission to the NSW Department of Planning and Environment in response to the public exhibition of the Wilton South East Precinct and the Interim Land Use and Infrastructure Implementation Strategy seeking for all outstanding matters to be addressed and that a revised Land Use and Infrastructure Implementation Plan and all three planning proposals be re-exhibited.***

Please find attached our earlier submission made to the NSW Department of Planning and Environment in February 2017 which outlines those matters which remain unresolved.

Council does not support rezoning of any land ahead of the finalisation of a robust planning framework which aligns housing supply with infrastructure delivery as outlined in the submission.

We will continue to work with your Department through the Executive Steering group to resolve these issues and ensure that a positive outcome is achieved for the community.

Should you wish to discuss this matter, please contact Wesley Folitarik on (02) 4677 9582 or via e-mail to wesley.folitarik@wollondilly.nsw.gov.au.

Yours faithfully



Chris Stewart
Director Planning
WOLLONDILLY SHIRE COUNCIL

- CC: The Hon. Angus Taylor – Member for Hume & Assistant Minister for Cities and Digital Transformation
- CC: Mr Jai Rowell MP
Member for Wollondilly
- CC: The Hon. Lou Amato, MLC
Member of the Legislative Council
- CC: The Hon. Lou Amato MLC
- CC: The Hon. Anthony Roberts
Minister for Planning
- CC: The Hon. Andrew Constance
Minister for Transport and Infrastructure.

Submission

NSW Department of Environment and Planning

Walker Corporation Proposal for Wilton South East Precinct

Planning Framework

- Council notes that the NSW Department of Planning & Environment is currently preparing a Land Use and Infrastructure Strategy (LUIS) to provide a framework for development of Wilton New Town.
- It is noted that this LUIS and the supporting technical studies that guide this document are not yet finalised.
- The LUIS is a critical guiding planning strategy that is expected to be given statutory weight through the preparation of a Section 117 Direction and amendment to the SEPP (Growth Centres)
- The LUIS is intended to provide guidance on:
 - Transport infrastructure
 - Health infrastructure
 - Education infrastructure
 - Cultural needs
 - Biodiversity
 - Housing density and typology
 - Affordable housing
 - Economic and retail growth
 - Employment targets
 - Pedestrian and cycleway networks
 - Open space and recreation
 - Activation and amenity
 - Air and water quality
 - Noise attenuation
 - Bushfire protection
 - Heritage
 - Mining coexistence
- The LUIS is in preliminary draft form and is incomplete. The Department has advised that the LUIS is not in a form sufficient to be formally reported to Council or subject to public consultation at this time.
- Without the LUIS and supporting technical studies being completed, Council is unable to undertake a comprehensive assessment of the proposal.
- Council will continue to work with the NSW Department of Planning & Environment to finalise the LUIS and resolve outstanding issues ahead of supporting any rezoning of land at Wilton

Documentation Consistency

- The proposal is supported by a number technical studies which have also been submitted to the NSW Government as part of the earlier SEPP-based rezoning proposal lodged by the Wilton Junction Landowner Group.
- Council as recently as August 2016 were reviewing these documents as part of the NSW Department of Planning's 'Tests of Adequacy' in responding to the Director – General's Study Requirements.
- It is unclear as to whether these studies have been satisfactorily updated to reflect the requirements of Council and the NSW Department of Planning & Environment
- The technical reports date back to the middle of 2014 and in many parts incorrectly cite a revised masterplan concept that has not been endorsed by Council.
- All documentation needs to be updated and reflect the endorsed masterplan or draft Land Use and Infrastructure Strategy for consistency and transparency. Council does not support the public exhibition of any documentation that does not accurately reflect the endorsed masterplan and subsequent LUIS. It is of critical importance to Council that all documentation is clear and consistent and illustrates endorsed masterplans supported by Government and Council.
- It is noted that the Indicative Layout Plan and Zoning Plan as submitted to Council by the NSW Department of Planning & Environment have been superseded via revised plans being submitted which altered the proposal to accommodate Council and OEHC concerns over clearing of vegetation. All supporting plans and studies should be updated to reflect the revised layout plan where inconsistencies occur prior to being placed on public exhibition.

Land Use

- The proposal seeks to rezone the subject site from RU2 Rural Landscape and RU4 Primary Production Small Lots to a number of zones including:
 - R3 – Medium Density Development
 - R2 – Low Density Residential
 - B5 – Business Development
 - B2 – Local Centre
 - SP2 – Infrastructure
 - E2 – Environmental Conservation
- The proposed land zoning map is generally in accordance with the Wilton Junction Masterplan as adopted by Council in December 2012.
- The proposed land use map proposes an area of B2 – Local Centre which would allow commercial and retail development including a full line supermarket without any limitations of floor space or scale.
- The Wilton Junction Masterplan as endorsed by Council in December 2012 only envisaged a 'neighbourhood centre' level precinct. Such a precinct is commonly zoned B1 Neighbourhood Centre which limits retail development to 'Neighbourhood Shops'. Under the LEP, the retail floor area for such development cannot exceed 400 square metres.

- The rationale for limiting the quantum of retail floor space in this location is to ensure that the neighbourhood centre does not diminish or impede the intended dominant role of the designated town centre on the western side of the Hume Highway.

Staging and Sequencing

- The proposal indicates that the first stage release of their precinct will commence from Picton Road via either the Pembroke Parade intersection or the Almond Street intersection and that an indicative staging plan is included in Appendix D. There is no staging plan included in the proposal documentation and Council does not support the proposal proceeding without provision of a staging plan unless it is first agreed to by Council and the NSW Department of Planning & Environment and integrated with the LUIS.

Employment Generation

- In 2012 when Council resolved to support a master planned new town at Wilton, a job to house ratio of 1:1 was adopted to ensure that employment opportunities would be provided locally to avoid forcing residents to burden long commutes for work which has economic, environmental and social implications.
- The proposal submitted by Walker Corporation will generate approximately 3,000 new homes and 1,900 jobs at full development in 2046. However, the report prepared by MacroPlan Dimasi in support for the proposal included 740 jobs in this figure that would be jobs where residents work from home or are home-based (i.e. mobile).
- The total number of jobs generated from non-residential based zones is therefore 1,160.
- It is acknowledged that the south eastern precinct was never projected to contain a very high proportion of the overall employment target for Wilton New Town. However, without the LUIS and supporting economic job generation strategy being finalised it is premature to endorse the proposed zonings until there is greater certainty that the broader Wilton New Town is capable of generating the required number of jobs to sustain new growth.
- Council has consistently advocated for the establishment of an appropriate mechanism to ensure that adequate employment opportunities are created to match housing supply. Council and the Department of Planning & Environment have agreed to work with landowners and part of developing the LUIS to arrive at such a mechanism. A series of workshops are currently being negotiated with the Department to resolve this issue.
- Council does not support any rezoning of land until there is an appropriate mechanism in place to ensure that adequate local employment opportunities are created to support housing growth.

Transport Infrastructure

- The Transport Management and Accessibility Plan prepared for the Wilton Junction Landowners Group dated 30 June 2014 has been submitted in support of the Walker Corporation proposal.
- The TMAP was based on an anticipated incoming population of 11,000 to 13,000 people. As such it was considered that the TMAP would need to be revised to

reflect the total likely development of Wilton New Town of 16,600 as outlined in the Greater Macarthur Land Release Investigation - Preliminary Strategy & Action Plan.

- The proposal is supported by a new traffic study dated July 2016. This was used to inform proposed infrastructure upgrades.
- The development will result in significant additional traffic loads on three intersections including:
 - Hume Highway/Picton Road interchange
 - Picton Road/Pembroke Road intersection
 - Picton Road/Almond Street intersection
- The development proposes sequential upgrades to the existing Hume/Picton Interchange can be constructed over time including 300 metre lengthening of the existing right turn lane from Picton Road and would culminate in duplication of off ramps and provision of additional stand-up lanes at signals. This does not appear to be consistent with the traffic study included with the proposal and it remains unclear as to whether this design solution is viable.
- Development of up to 900 homes and 300 jobs being accommodated with a “single access” from either Pembroke Parade or Almond Street intersections.
- A cash contribution towards the construction of the second signalised intersection at Picton Road and Almond Street will overcome the existing safety issue at this location plus provide for a 4 way intersection allowing access to WSEP. This contribution would need to be combined with the contribution Lend lease Communities are required to pay under the Council VPA signed 3 November 2000.
- A bridge over Picton Road near Janderra Lane connecting the south east precinct with the existing Wilton village is also proposed.
- While generally supporting the Indicative Layout Plan, Council prefers that Almond Street be provided with grade separated intersections 12-24 months after consent of stage 1.
- In October 2016, the NSW Department of Planning & Environment engaged Jacobs engineers to carry a comprehensive Transport Plan for Wilton. This is anticipated to be concluded in Q2 2017.
- Council recommends that the Indicative Layout Plan and proposed infrastructure upgrades and funding mechanisms be discussed further in consultation with the RMS and Jacobs.

Public Transport

- The TMAP found that “Improvements to public transport services and infrastructure are recommended to reduce the amount of car use and meet State Government targets for sustainable transport. The major component of the public transport network would be a greatly expanded bus network, with a mixture of regional, local, school and rural services and service levels commensurate with a town of the size planned for Wilton Junction”.
- As previously alluded to this assessment did not take into consideration the current estimated dwelling yield for Wilton of 16,600 as outlined in the Greater Macarthur Land Release Investigation - Preliminary Strategy & Action Plan. Nor does it consider the implications of the Greater Macarthur Consultation update which foreshadowed a further 18,000 homes at West Appin by 2046.

- The TMAP only considering the lower dwelling yield of 11,000-13,000 is deficient and does not accurately consider the real development potential of Wilton and surrounding growth planned for West Appin as identified in the Greater Macarthur Land Release Investigation Preliminary Strategy & Action Plan.
- The TMAP proposed a bus network plan which provided for:
 - bus routes, service frequencies and journey time estimates
 - estimates of the bus fleet required to service the bus plan
 - interchange and layover focused within the Town Centre
 - facilities for passengers at the Town Centre, neighbourhood centres and along the bus routes.
- Then TMAP and supporting documentation provided as part of proposal does not fully articulate the timing for delivery of a bus network and the location of a bus interchange. This needs to be resolved as part of the LUIS before being placed on public exhibition.
- Council is concerned that the issue of public transport has not been adequately resolved and that rezoning should not occur until the LUIS has finalised an integrated public transport plan that provides for the logical establishment of early priority bus services and interchange and the planned introduction of passenger rail services to meet growth as it occurs overtime.
- Council notes that a proposed local bus network has been submitted as part of the proposal however this needs to be considered in tandem with the LUIS and involve discussion with local bus service providers and Transport for NSW.
- While bus services are appropriate in the short to medium term in the development of Wilton New Town it is the strong view of the Council that passenger rail would provide the best outcome for Wilton New Town.

Walking and Cycling

- Council notes that a Pedestrian & Cycling Masterplan has been submitted as part of the proposal. This needs to be updated to reflect the most recent Indicative Layout Plan
- Council is generally satisfied that pedestrian and cycleway network proposed will encourage active transport however, this network will need to be reflected in the LUIS to ensure that it integrates well with the broader masterplanned area.
- Further consideration should be given to integrating other infrastructure into the pedestrian and cycleway network that promotes health and wellbeing outcomes. Eg: outdoor gym equipment

Housing Choice and Affordability

- Housing typology is not given enough consideration in the indicative layout plan / structure plan.
- Council has prepared a Social Planning Strategy (adopted Nov 2016) which has identified 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 for the Wilton Junction Landowners Group 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.
- A model DCP has been submitted in support for the proposal which proposes a clause with a blanket minimum lot size of 400m² with provision for a minimum lot size of 200m² in areas close to parks, retail services and transport.
- Council does not support this approach and will emphasise 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.
- The LUIS is anticipated to provide further guidance and requirements for adoption of principles to support a range of housing choices but in the right locations.
- The LUIS should establish 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.

Proposed Development Standards – Minimum Lot Sizes

- A model DCP has been submitted in support for the proposal which proposes a clause with a blanket minimum lot size of 400m² with provision for a minimum lot size of 200m² in areas close to parks, retail services and transport.
- Council is not supportive of this blanket approach to minimum lot size use and believes that a more strategic approach should be preferred where housing density is planned to be provided close to services, parks and amenities and along designated transport corridors such as local bus routes. Such an approach also does not sufficiently respond to the natural features of the Wilton Priority Growth Area and reflect the visual and environmental qualities that would justify larger lot sizes in these locations.
- Council is not supportive of clause 4.1C that allows an exception to minimum lot sizes of 200m² for certain development within the R2 zone if lots adjoin a recreation area or bus route. This does not consider design-led principles with master planning and could result in an ad hoc approach to housing density which does not well integrate with planning for local services and amenities as a masterplanned community should. Justification that this can be controlled through a DCP is not supported. 200m² lots should be consistent with proposed R3 zoning.

Affordable Housing

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

Biodiversity Offset Strategy

- Council has reviewed an Ecological and Offset Strategy provided in March 2014 as part of the Director – General's Requirements and recent biodiversity reports prepared on behalf of Walker Corporation.
- Council believes that there is insufficient delineation of areas of exotic and native grassland areas in accordance with applicable Scientific Determinations by data and mapping within the Strategy.
- Council believes that there is an underestimation of identification of the conservation value of the site as a consequence of deficiencies regarding grassland areas as well as the significance of the open woodlands in the northern part of the site.
- Council considers that there is an absence of a defined pathway and mechanism to adequately offset biodiversity losses associated with the proposal consistent with established biodiversity offset strategy.
- These issues must be fully resolved before any rezoning take place

Noise Mitigation

- Council has concerns with the proposed noise barrier consisting of a 10m high by 10m wide landscaped setback from Picton Road. Picton Road forms the eastern entrance to Wollondilly and Wilton is the first village traveling from Wollongong. Its rural landscape and setting are key to forming identity and sense of place. The visual impact of this wall along the northern edge of WSEP creates a visual barrier to motorists. This can be likened to traveling down a motorway. Council's preference is for an alternative solution to be considered.
- Council also has concerns with the requirement for land purchasers to fit acoustic rated windows/doors to achieve a 6dBA reduction. It is suggested that a further setback from Picton Road be required or an alternative solution to reduce the need for acoustic treatment to dwellings.

Heat Island Mitigation

- Council is strongly concerned with the effects of creating heat islands. Further consideration should be undertaken to setting appropriate targets in the LUIS to control the heat island effect and mechanisms to ensure these targets are achieved included in a new DCP for Wilton New Town. As part of addressing this issue, the proposal for the South East Precinct should include a landscape masterplan with a planting guide to assist in providing adequate shading to public places and roads, cycleways and footpaths to limit heat retention.

Community Consultation and Public exhibition

- It is noted that as this planning proposal is considered to be a submission to the draft LUIS and that the NSW Department of Planning & Environment is the relevant planning authority. Accordingly, Council requests that these issues be fully resolved before the draft LUIS is placed on public exhibition.

Other issues:

- The draft LUIS needs to consider the needs for additional cemetery services to meet planned growth needs.
- The draft LUIS needs to consider the needs for additional waste disposal to meet planned growth needs.