

Our Ref: 888815lt20

4 November 2015

Department of Planning and Environment  
Attention: Housing Land Release  
GPO Box 39  
SYDNEY NSW 2001

Delivered by email to [community@planning.nsw.gov.au](mailto:community@planning.nsw.gov.au)

Dear Sir/Madam,

**SUBMISSION TO GREATER MACARTHUR PRELIMINARY STRATEGY  
SPECIFIC TO No.415 WILTON PARK ROAD, WILTON**

We refer to the *Draft Greater Macarthur Preliminary Strategy and Investigation Area* which is on public exhibition until 4 November 2015. We act on behalf of the owners of No.415 Wilton Park Road, Wilton (Lot 21 in DP 829001), Mr. and Mrs. Woodward in making this submission.

We are pleased to see that the Department of Planning and Environment (DPE) has made a very practical decision to include the land between the Bargo River and Picton Road, in the vicinity of Wilton Park Road including Jakes Way and Marcus Street, in the Investigation Area. The inclusion of this land is consistent with our previous request that the investigation area boundaries be defined by significant features of the landscape which best delineate areas for review and investigation (rather than the previous cadastral boundaries).

We also appreciate the efforts to date in preparing preliminary capability assessments and infrastructure capacity and servicing investigations which form the exhibition material.

In summary, this submission requests that any future structure plans and further exhibition material are better integrated to achieve optimum efficiency in land development and an overall better planning outcome. This can only be achieved if more work is undertaken to improve the scope and level of detail in each specialist study and that the outcomes of all studies be integrated into a comprehensive document which identifies the practical and equitable manner in which land is to be developed.

The supporting studies included with the exhibition material to date have merit in presenting the matters detailed in each specialist field notwithstanding that most of the studies acknowledge there are important gaps in the information available to date and further specialist investigations are required.

Before any detailed planning or indicative layout plans are prepared for further exhibition it is essential that:

- (i) The gaps identified in each study are addressed;
- (ii) Additional studies on costing of all social infrastructure and the management and protection of lands for biodiversity, cultural and bushfire hazard reduction are factored into costs per dwelling;
- (iii) Additional study is completed on the relative efficiencies of lot and dwelling density and size in terms of infrastructure provision and maintenance and market dynamics;

- (iv) The findings of each study are integrated into an overarching document of land capability assessment with a comprehensive servicing and delivery strategy; and
- (v) All land owners are invited to participate and provide feedback to the next versions of exhibition material prior to the formal public exhibition period.

The various specialist studies identify a range of land capability factors which need to be brought together to prepare a comprehensive precinct plan. The precinct plan will need to identify future patterns of land use and the practical mechanisms for implementing changes. For example, the *High Level Services Infrastructure Strategy* (AECOM September 2015) has presented preliminary costings per dwelling based on assumptions of dwelling yields and commercial floor space. However, these costs will need to be revised once gaps in other detailed land capability assessments have been completed. We expect that more detailed investigations are to follow.

Further detailed investigations need to take into consideration:

- (i) the social infrastructure requirements and costs identified in the *Social Infrastructure Assessment* (GHD July 2015); and
- (ii) the land to be identified for biodiversity conservation, landscape and scenic values, Aboriginal cultural and archaeological significance and asset protection.

As with infrastructure, the land to be set aside for biodiversity conservation, landscape and scenic values, Aboriginal cultural and archaeological significance and asset protection is a community asset because the general community stands to benefit from the management, protection and retention of these lands for these purposes. The costs of setting aside and managing these lands appropriately must therefore be accounted for in the costs per dwelling calculations.

The effective delivery of changes to land use can only be achieved when there is a comprehensive understanding and commitment to:

- (i) the practical mechanisms of implementation; and
- (ii) the manner in which the costs are equitably distributed amongst the stakeholders.

For these reasons we request that all landowners are invited to participate in discussions related to the potential costs and implementation mechanisms prior to the next public exhibition period.

We also note that the majority of the Wilton Investigation Area is 'greenfield' rural-zoned land. The example set by Bingara Gorge is notable in the range of densities and lot sizes approved and the current proposal by Lend Lease to increase density, reduce lot sizes and increase lot numbers. To ensure that decisions on future lot sizes and dwelling densities are appropriate for the Wilton Investigation Area we request further specialist studies are undertaken to investigate the market and practical implications (including costs for servicing and maintaining infrastructure) for a variety of lot sizes and densities. Such a study is required to provide guidance on future decisions for optimum and sustainable densities and land use mix. This additional study will need to be developed in collaboration with the revised costing strategy mentioned above.

In our view these additional studies for costing, yields and densities are essential for both public and private sector stakeholders to:

- (i) work cooperatively in future decisions on land use change; and
- (ii) to achieve the optimum outcomes for sustainable development.

To proceed without this information and without further input from stakeholder on these matters will present significant challenges and complications to the future orderly development of the investigation area.

Accordingly, we urge the DPE to undertake these studies and make arrangements for further engagement with private and public stakeholders prior to the next public exhibition period.

We trust that this submission is self-explanatory. We would appreciate the opportunity to discuss this submission further with DPE staff. Should you require any further clarification in the meantime, please do not hesitate to contact our office direct on Ph 9531 2555.

Yours faithfully,  
**Planning Ingenuity Pty Ltd**



Jeff Mead  
**DIRECTOR**