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Carolyn McNally
Secretary
Department of Planning and Environment
23 Bridge Street
SYDNEY NSW 2000

18 November 2015

Dear Ms. McNally

Submission: Greater Macarthur Land Release Strategy

Bradcorp is pleased to provide the attached submission on the Greater Macarthur Land Release Strategy to the Department. We look forward to the Department progressing the Strategy, which will provide a self-sufficient new town at Wilton Junction.

Given Bradcorp's continued commitment in the south-west community of Sydney, we are encouraged and excited about Governments vision for its future as a successful, identifiable and sustainable polycentric region of Sydney.

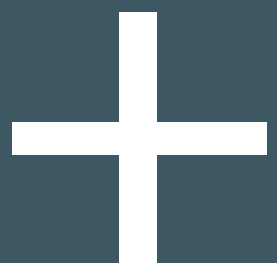
Yours sincerely

Peter Brennan AM
Chief Executive Officer
Bradcorp Holdings

**GREATER MACARTHUR LAND RELEASE INVESTIGATION
SUBMISSION**

WILTON PARKLANDS

November 2015



GREATER MACARTHUR LAND RELEASE INVESTIGATION SUBMISSION

NOVEMBER 2015

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Document Status

Version	Comment	Prepared By	Reviewed By	Review Date	Approved By	Issue Date
1	Draft Report	D+P	NGM	26/10/15	NGM	26/10/15
2	Draft Report	D+P	NGM	16/11/15	NGM	16/11/15
3	Final	D+P	GWE	18/11/15	NGM	18/11/15

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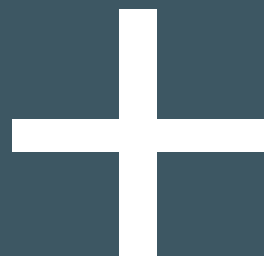
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1 EXECUTIVE SUMMARY

The release of the Greater Macarthur Preliminary Land Release Investigation and Strategy (GMLRI) is a bold and pragmatic response to delivering Sydney with housing growth in a sustainable way. The proposal by the Department of Planning & Environment (DoPE) to incorporate Wilton into the Growth Centres SEPP as a Priority Growth Area is fully supported and commended.

The Bradcorp project, Wilton Parklands, is the largest landholding within the Wilton Junction rezoning proposal (550 hectares of developable land). Wilton Parklands offers a significant opportunity to deliver essential housing supply and a new community (in excess of 5,400 dwellings) with supporting infrastructure (Refer Figure i).

Bradcorp, along with Walker Corporation and Governors Hill have been working co-operatively with Wollondilly Council and DoPE since April 2012 to deliver a self-contained new town at Wilton comprising 11,000-13,000 high quality new homes for 30,000-35,000 people. The Wilton Junction rezoning proposal has addressed the Director General's Requirements (DGRs) issued in May 2013, the studies were lodged with DoPE in June 2014 and an enhanced 'no additional cost' to Government funding offer made in June 2015. The SEPP process can now proceed immediately under the banner of the Growth Centres SEPP.

This submission has been prepared on behalf of Bradcorp and is supportive and complementary to the Wilton Junction Landowners submission.

Bradcorp want to continue working constructively with all levels of Government to achieve a timely and effective outcome where all of Wilton Junction proceeds as one proposal in order to deliver an economic, social and environmentally sustainable new town.

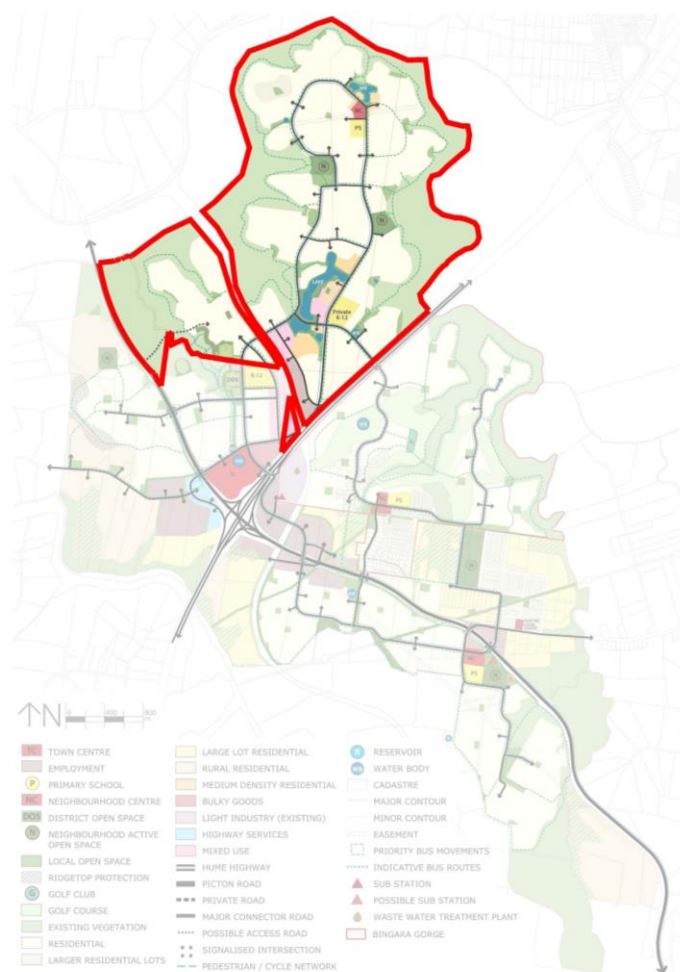


Figure i: Wilton Junction Master Plan (Bradcorp Landholding)

Wilton Parklands

The formulation of Bradcorp's Wilton Parklands Master Plan has occurred simultaneously with the preparation of the Wilton Junction Master Plan. Wilton Parklands comprises approximately 550 hectares of developable land and is estimated to deliver over 5,400 residential dwellings.

The principles of the 'Garden City' movement are the main driving platform for the design and land use arrangement at Wilton Parklands, coupled with a structure that responds sensitively to the topography and physical setting. The overriding design approach has been to ensure the highest level of intergration of the land uses, and in turn the connection with the surrounding bushland forming a visual curtain around the site – it will be the '*best of the city and the best of the country*'.

Bradcorp's Wilton Parklands project is proposed to be a place that offers a broad range of land use components comprising:

- A combination of housing, employment, education, conservation, culture, retail, entertainment, lifestyle and amenity to create a self-contained new and attractive community;
- A population that sustainably comprises a diverse community of first home buyers, aspiring young families, key workers, knowledge-based works, service workers, managers and professionals;
- Critical mass that can provide services, education and employment opportunities; and,
- Social capital capture and retention of economic benefits within the region by creating an employment base that retains residents.

The delivery of these components will provide residents, and visitors, with a full range of services and activities to help the community grow and prosper as part of a robust new town. The integration of all of the components will make Wilton Parklands a highly liveable, connected and culturally rich place to live, work, learn and play.

One of the main features of Wilton Parklands is water and the formation of a new community around a large lake with a 'Mixed Use Node' in the south of the site. The lake is an integral part of the project due to its place-making qualities and multi-functional benefits to the future community. Importantly, the lake is an integral part of a sewer treatment system that has in principle EPA support.

Activating the 'Mixed Use Node' is a mixture of convenience shopping, entertainment and commercial activities, restaurants and cafés, education and recreation pursuits. The 'Mixed Use Node' is also in an ideal location for a Smart Work Hub, which allows residents to work in alternative locations closer to home. The 'Node' offers residents with the opportunity for teleworking in a healthy and active alternate work space to their offices or homes.

The main north-south Spine Road is aligned on the highest point of the site to create an impressive elevated entry that has views across the project, in particular the lake in the foreground and the Razorback Mountain Range on the outer boundary. The integration of new off ramps, on-ramps and bridges with this Spine Road will provide residents with a safe commute, which avoids freight traffic using the Picton and Hume Highway intersection.

Wilton Parklands is a key part of the broader Wilton Junction new town. Wilton Parklands, together with the remainder of Wilton Junction needs to be delivered at the same time in order to achieve an environmental, social and economically sustainable new town. The holistic delivery of this new town will avoid the undesirable outcome of creating separate dormitory suburbs on each quadrant of the Hume Highway and Picton Road intersection.

Greater Macarthur Land Release Area

The Department of Planning & Environment (DoPE) propose to implement the Greater Macarthur initiative to deliver 35,000 new homes by:

- Including Menangle Park & Mount Gilead and Wilton as Priority Growth Areas into the State Environmental Planning Policy (Sydney Region Growth Centres) 2006 and.
- Declaring Menangle Park & Mount Gilead and Wilton as Special Infrastructure Contribution Areas.

- Continuing to work closely with Council and NSW Government agencies to deliver new communities with homes, jobs, infrastructure and services, while protecting the environment and natural resources.

Overall, the release of the Greater Macarthur Land Release Investigation and the Preliminary Strategy & Action Plan is a positive and pro-active step by the Department of Planning & Environment and the NSW Government. Wilton Junction in particular provides an opportunity that addresses housing supply, affordability issues and provides substantial economic stimulus for Sydney. The Greater Macarthur Region has the opportunity to create new towns and communities, such as Wilton Junction, through provision of essential infrastructure delivered simultaneously to ensure all the necessary facilities and services are available to enable them to grow and prosper.

Preliminary Vision Plan

The Draft Vision Structure for Wilton shows the location of developable land, employment land, centres and infrastructure improvements for the Wilton Priority Growth Area.

We note that there are several differences between the Draft Vision Plan and the Wilton Junction Master Plan that affect the Bradcorp landholding, these include:

- The location of 'Village Centres' identified on the Bradcorp land as shown on the Wilton Junction Master Plan.
- The 'Developable Area', which is not representative of the boundary illustrated on the Wilton Junction Master Plan.

The Wilton Junction Master Plan has been prepared based on extensive investigation and coordination of inputs from Wollondilly Council, State Government agencies, landowners and specialist consultants over a four year period. We believe the ultimate Wilton Priority Growth Area Structure Plan should reflect the more detailed Wilton Junction Master Plan work undertaken by the landowners (Refer Figure ii).

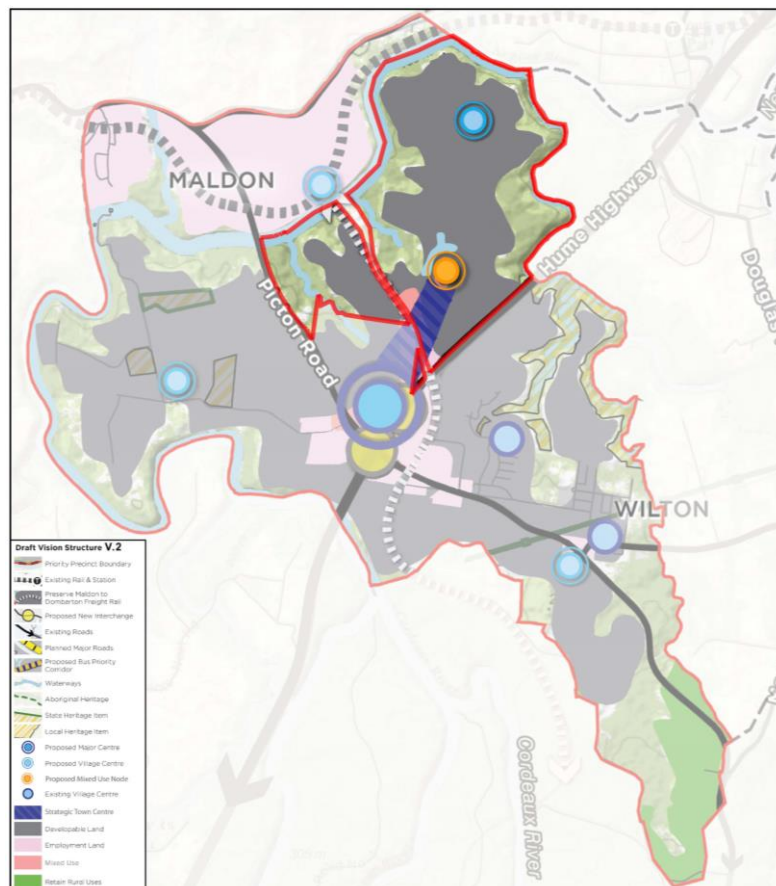


Figure ii: Suggested Wilton Priority Growth Area Vision Plan

Employment delivery for Wilton Junction targeted a 0.7:1 ratio in line with the potential that derives from higher levels of employment based upon it being a 'Garden City' and approaching the attributes of the nearby Wingecarribee Shire.

To ensure consistency between the detailed work undertaken on the Bradcorp land for the Wilton Junction rezoning proposal, we respectfully request that the developable area and the land use arrangements shown on Figure ii be incorporated into the final Structure Plan for the Wilton Priority Growth Area.

Rezoning Pathway

The Rezoning Pathway promoted by the State Government for the Greater Macarthur Priority Growth Areas has merit for areas not currently part of a rezoning process. There is the need for a process to ensure that existing rezoning proposals that have Director General's Requirements can be expedited to gazettal.

There has been considerable time, financial investment and commitment by the landowners, Wollondilly Council and State Government to advance the Wilton Junction rezoning proposal, including an infrastructure package offer to Government. It would be a missed opportunity if the rezoning pathways for the existing rezoning proposal were not expedited and progressed as originally proposed.

There is nothing preventing the Minister for Planning from amending the Growth Centres SEPP to include the Wilton Priority Growth Area, then immediately release the Wilton Junction Precinct for rezoning and simultaneously exhibit the Wilton Junction Planning Proposal.

The pathway suggested to advance the rezoning of land within the Wilton Junction Precinct is:

- Following Exhibition of the draft GMIA the Minister amends the Growth Centre SEPP to include Wilton as a Growth Centre. The Minister also adopts the Greater Macarthur Land Release Preliminary Strategy as the Structure Plan (as amended) to reflect the Wilton Junction Masterplan.
- In parallel the Department, in consultation with Wollondilly Council, finalises the draft planning instrument. The Wilton Junction proponents update the environmental report to reflect changes to Threatened Species listings.
- Minister releases Wilton Junction (excluding the village of Wilton & Bingara Gorge) for Precinct Planning (under CI 276 of EP&A Regs) adopting the Director General's requirements issued for Wilton Junction. The Minister instructs the Wilton Junction Precinct Planning documentation together with the Wilton Junction proponents offer of commitment for the provision of infrastructure to be exhibited as soon as practical.
- The infrastructure mechanisms (VPA) for Wilton Junction is prepared, exhibited and then finalised.
- Minister approves the amendment to the Growth Centre SEPP that amends Council's LEP.
- Growth Centre SEPP Gazetted and Wilton Junction precinct is zoned for urban purposes.

A significant opportunity exists to deliver NSW with housing within the same two year period as stated for the proposed Menangle Park & Mount Gilead Priority Growth Area.

Rezoning Pathway Step - Coal Mining

The Bradcorp land has been identified as 'encumbered' due to future coal mining. The Government documentation outlines 'Pathway Steps' that 'encumbered' land needs to satisfy prior to development proceeding. The Wilton Junction rezoning proposal demonstrates that the 'Pathway Steps' can be addressed to the satisfaction of all stakeholders. The details that address these issues are already contained in documentation previously provided to the State Government.

Rezoning Pathway Step - Biodiversity

The biodiversity rezoning pathway steps to be followed prior to rezoning have been substantially completed as part of the Wilton Junction rezoning proposal. There is the need to resolve the biodiversity offsets and resolution of the management arrangements for the conservation areas, however, this is not a matter that needs to be resolved or negotiated prior to exhibition, rather finalised prior to gazettal.

Rezoning Pathway Step - Infrastructure Funding Mechanism

The notion of a Special Infrastructure Contribution for the new Wilton Priority Growth Centre is supported and the opportunity for planning agreements to be entered into with the Minister for Planning to ensure that an appropriate mechanism is in place to secure infrastructure to support growth is also supported by Bradcorp.

Conclusion

On behalf of Bradcorp, we commend the Government for the initiative and foresight to identify Wilton as a Priority Growth Area under the Growth Centres SEPP and taking bold and positive steps to expedite delivery of a new town at Wilton.

Bradcorp has been integrally involved in the preparation of the Wilton Junction Rezoning Proposal and have invested the most effort to ensure that Wilton new town will be a highly sustainable new community delivering housing and benefits that deliver outcomes and opportunities within and beyond Wilton.

We request that the Government adopt the work undertaken by the Wilton Junction Landowners as part of the preparation of the Wilton Junction Master Plan and continue the rezoning process by finalising the zoning documentation of the Wilton Junction Precinct and exhibit this precinct as soon as possible within the Wilton Priority Growth Area to enable the vision for the 'Wilton New Town' to be delivered.

2 INTRODUCTION

This submission has been prepared on behalf of Bradcorp Pty Ltd in response to the recent release of the Greater Macarthur Preliminary Land Release Investigation and Strategy (GMLRI).

Bradcorp own a significant land parcel, being the largest landholding within the proposed 'Wilton Growth Centre', which has been progressing towards rezoning for urban purposes over several years. Wollondilly Shire Council exhibited the Wilton Junction Structure Plan in late 2012 to obtain initial feedback from the local community. Wollondilly Shire Council resolved to grant in-principle support for the Master Plan and our client has since outlaid significant capital with adjoining landowners who have been involved to progress the Wilton Junction rezoning proposal.

Bradcorp is encouraged and excited by the recent Government announcement and release of the GMLRI documentation and highly commend the Government for the positive steps being taken to boldly deliver much needed housing for the growth of Sydney. Importantly, it is acknowledged that the NSW Government is delivering on their commitments.

The Wilton Junction rezoning proposal has now been progressing over the past four years and this has been a result of a strong working relationship with Wollondilly Council and the State Government agencies to achieve a shared vision of delivering a 'new town'. There is opportunity for Government to take advantage of the extensive work carried out on the fully master planned Wilton Junction and commence delivery of this brand new town, which will provide much needed housing, in conjunction with jobs and infrastructure sooner rather than later. Bradcorp is committed to maintaining a strong working relationship with all levels of Government to deliver the vision for their land at Wilton.

The Bradcorp landholdings comprise the Wilton Parklands project which is the largest development project within the Wilton Junction rezoning and is also the single largest landholding within the proposed Wilton Growth Centre. Wilton Parklands provides a significant opportunity to deliver essential housing supply (in excess of 5,400 new homes) and infrastructure for the Wilton Growth Centre and for the Greater Macarthur Region. With its setting below the Razorback Range, surrounded by wooded environmental lands and large lake in the middle, the new town of Wilton Parklands will be unsurpassed as a place where people desire to live, work, learn and play.

This submission has been prepared to provide Government with an understanding of the Bradcorp vision for their land and matters associated with the Greater Macarthur Land Release documentation that relate to the Bradcorp landholding. This submission has been prepared solely for the Bradcorp landholding and is supportive and complementary to the Wilton Junction Landowners submission.

3 BRADCORP

Bradcorp Holdings Pty Ltd is an industry leader in the development of residential communities that set new standards in amenity and lifestyle. Bradcorp's project portfolio is well in excess of \$1 billion and stands as testament to their ability to:

- innovate;
- show respect for the environment; and
- demonstrate their belief in the social obligation to carry out good and thoughtful planning.

The founders of Bradcorp have a wealth of experience in property development, land acquisition, finance, marketing and planning that pre-dates the formation of the company in 1996. Their combined knowledge allows them to challenge the accepted conventions of residential development turning aspiration into inspirational living environments.

Central to everything Bradcorp do is a long-term commitment to the local communities in which they develop through support for individuals and community initiatives and the high level of consultation that proceeds every proposal.

Bradcorp work closely with local residents and stakeholders to ensure the community has a strong sense of pride and ownership to ensure the character and natural environment benefits generations to come. Bradcorp's commitment to creating unique living environments has been recognised through numerous prestigious awards including:

- Bingara Gorge - Design Concept of the Year at the HIA/Boral GreenSmart Awards;
- HIA Housing Estate of the Year for Nangarin Estate;
- UDIA Award for Excellence for Environmental Planning and Development for The Cascades.
- Stormwater Industry Association Award for Environmental Excellence Commendation for the environmental credentials of The Cascades.

Bradcorp has concentrated its developments in Sydney's southwest region, in particular around Picton for a long time, having become a respected part of the community with a long-term stake in its success. This commitment to the South West Region is based on a strong belief that it has a bright future.

Through the Bradcorp Community Partnership Fund, Bradcorp is able to express their social and financial commitment to the local community and enjoy the satisfaction of knowing that they have contributed in a small way to enhance the communities in which they operate.

4 OVERVIEW OF WILTON JUNCTION

Wilton Junction is based on the Garden City principles of 'planned, self-contained communities surrounded by "greenbelts", containing residences, industry, and agriculture'. The Garden City is self-sufficient and forms a cluster of several garden cities as satellites of a central city, linked by good connections.

The notion of satellite towns around the Sydney Metropolitan area derives from the 1948-1951 County of Cumberland Plan which proposed a greenbelt with any expansion to be in satellite towns. The 1970-2000 Sydney Region Outline Plan promoted growth corridors, while 'Sydney in to its Third Century 1988' identified Wilton and the whole Wilton Junction area as one of several 'Areas for Future Development'. The notion of a new town on the fringe of Sydney reinforces a poly-centric city linked by good connections, though separated by natural greenbelts and corridors.

Wilton Junction is well positioned at the intersection of the Hume Highway and Picton Road to provide a new 'Garden City' town at the doorstep to Sydney, Wollongong and the Southern Highlands.

The focus and concentration of activity at this location has commenced with the Bingara Gorge development and this will be supplemented and complemented by development within the balance of the Wilton area. Wilton Junction is designed to be highly liveable with a variety of convenience shopping, entertainment and commercial activities, restaurants and cafés, education and recreation pursuits connected by an extensive network of pathways and a transport framework that provides public transport and generally high levels of accessibility.

The early identification of development potential for Wilton is now gaining momentum with the Wilton Junction Landowners having progressed a rezoning proposal for the Wilton Junction area for several years. The opportunity now exists with the Government's announcement to establish a new Wilton Priority Growth Area to capitalise on the work undertaken by the landowners to date to deliver housing for a growing Sydney and Greater Macarthur Region.

4.1 Wilton Junction

The vision for Wilton Junction is to create a high quality new town that delivers housing diversity and choice with a high level of employment and service self-sufficiency. This is to be achieved by utilising its locational advantages at the crossroads of the Hume Highway and Picton Road (Refer Figure 1), and building on the exceptional environmental context of the site by integrating the surrounding gorges and bushland with an open space and pedestrian network that permeates the whole site.

Wilton Junction has potential to become the regional focus for Wollondilly Shire and surrounding areas attracting a new generation of employment opportunities and ensuring the preservation of the existing 'village' qualities and lifestyle attributes of existing towns within the Shire.

The decision to work towards an integrated Master Plan for Wilton Junction was taken after the State Government invited landowners in 2011 to nominate sites which might deliver additional housing to address Sydney's housing shortage.

Bradcorp is one of three landowners working co-operatively with Wollondilly Council since April 2012 to deliver a new town at Wilton that will comprising 11,000-13,000 high quality new homes 30,000-35,000 people. Supporting the new community will be:

- A new major town centre and several neighbourhood centres.
- Employment areas to deliver jobs close to home (approx. 11,000 jobs).
- A range of community facilities and services.
- Road and infrastructure improvements and upgrades.

Director General's Requirements (DGRs) were issued in May 2013 by the Department of Planning to guide planning and the specialist investigations to inform the rezoning of the Wilton Junction landholdings. All of the required studies have been undertaken by the landowners at a cost of \$7 million, including an infrastructure

strategy. The complete rezoning documentation package fulfilling the DGRs has been submitted to the Department of Planning & Environment and is awaiting approval to proceed to exhibition.



Figure 1: Wilton Junction Location Plan

Wilton Junction will bring together the best of city and rural life. It will feature easy access to growing employment opportunities, as well as recreation and community facilities, all set against the natural backdrop of bushland, gorges and the Nepean River.

Wilton Junction forms a significant part of the NSW Government's new 'Wilton Priority Growth Area' under the State Environmental Planning Policy (Sydney Region Growth Centres) 2006 (Growth Centres SEPP) (Refer Figure 2).

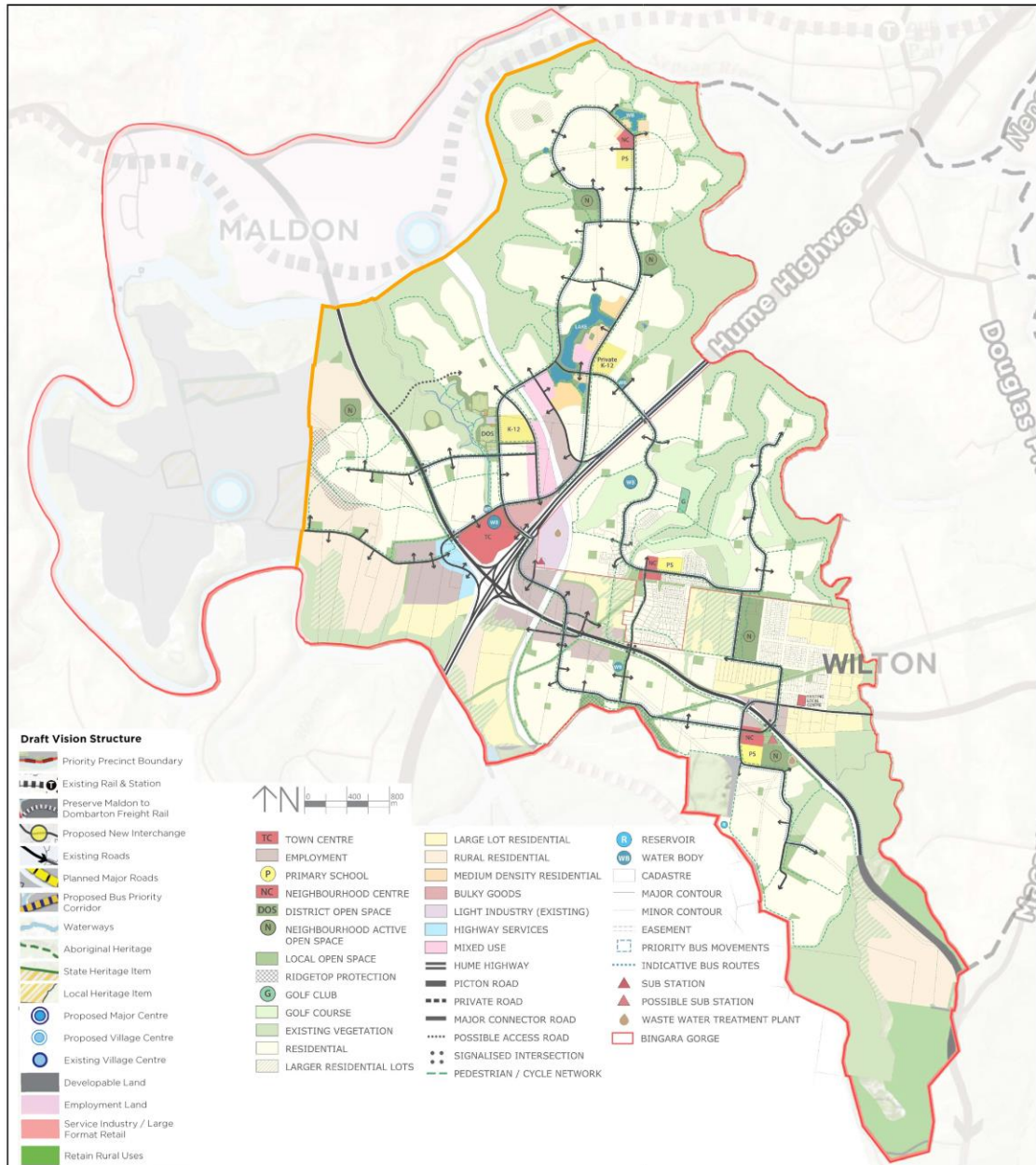


Figure 2: Wilton Junction Precinct of the Wilton Priority Growth Area

Lend Lease's Bingara Gorge development will also form part of the new Wilton Junction community, but is already zoned for urban purposes. Lend Lease is continuing to work with the Wilton Junction landowners, Wollondilly Shire Council and the NSW Government to plan and deliver the new Wilton Junction town and associated infrastructure.

4.2 Wilton Parklands

The formulation of Bradcorp's Wilton Parklands Master Plan (Refer Figure 3) has occurred simultaneously with the preparation of the Wilton Junction Master Plan by Connor Holmes.

The principles of the 'Garden City' movement are the main driving platform for the design and land use arrangement at Wilton Parklands, coupled with a structure that responds sensitively to the topography and physical setting.

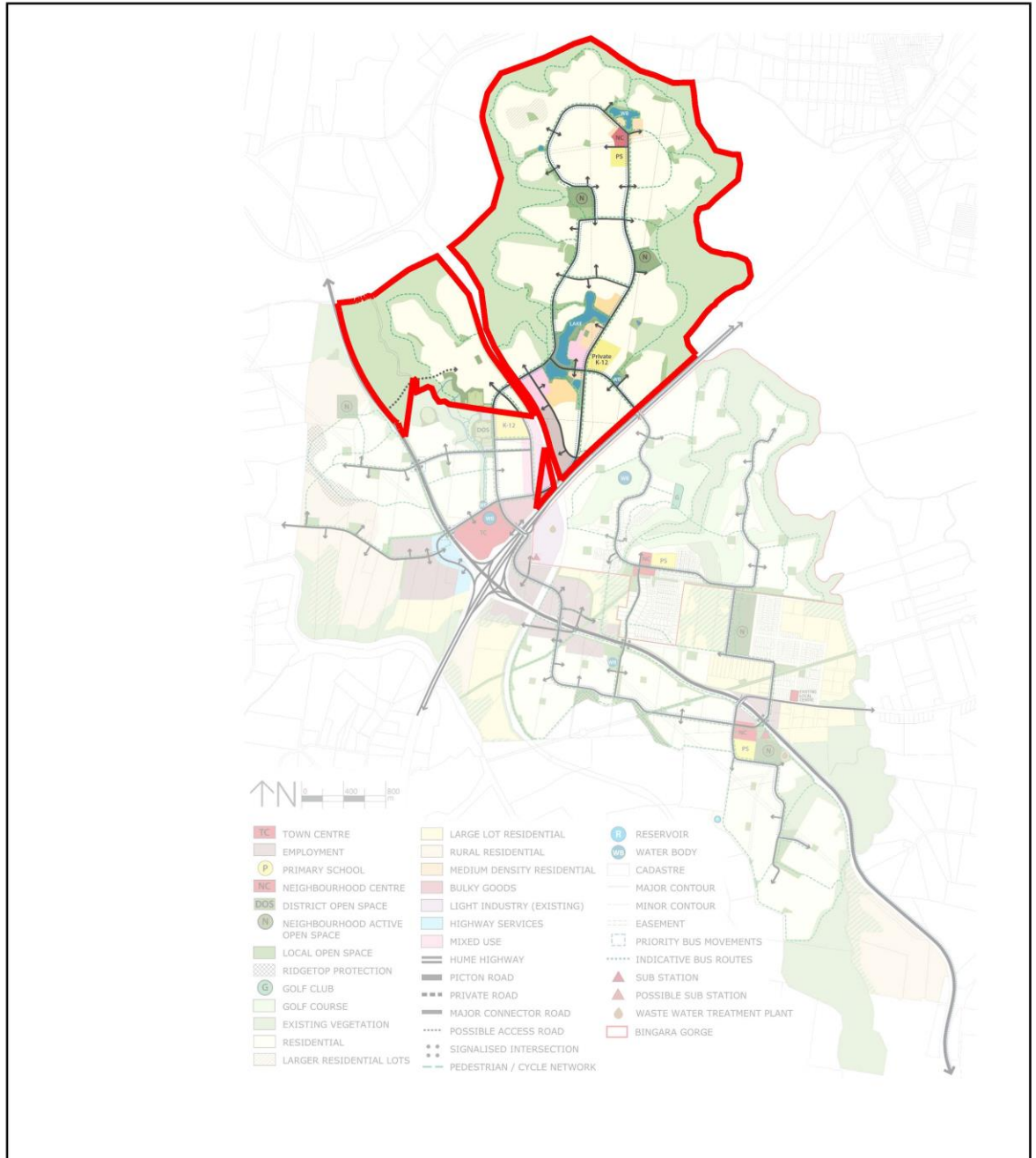


Figure 3: Wilton Parklands area of Wilton Junction

The overriding design approach has been to ensure the highest level of connectedness of the land uses, in turn the connection with the surrounding bushland forming a visual curtain around the site – it will be the *'best of the city and the best of the country'*.

Wilton Parklands is proposed to be a place that offers a broad range of components comprising:

- A combination of housing, employment, education, conservation, culture, retail, entertainment, lifestyle and amenity to create a self-contained new and attractive community;
- A population that sustainably comprises a diverse community of first home buyers, aspiring young families, key workers, knowledge-based works, service workers, managers and professionals;
- Critical mass that can provide services, education and employment opportunities; and,

- Social capital capture and retention of economic benefits within the region by creating an employment base that retains residents.

The delivery of these components will provide future residents, and visitors, with a full range of services and activities to help the community to grow and prosper as part of a robust new town. The integration of all of the components will make Wilton Parklands a place that:

- Is highly liveable with a range of experiences for all future residents and visitors, so that people live, work, learn and play.
- Is a truly connected, intelligent community applying the very latest in technology and accessibility.
- Is highly connected to other areas within Wilton Junction and externally to destinations such as Picton, Campbelltown, Liverpool, Wollongong, the Southern Highlands, South West Sydney and broader metropolitan Sydney.
- Is in close proximity to the proposed M9 Orbital, enabling ease of access to locations such as the future Western Sydney Airport and Western Sydney Employment Area.
- Capitalises on the opportunity for a strong entertainment, cultural and commerce focussed hub for the area, anchored with education.
- Has a diversity of housing types and to capture a full socio-economic mix within the Wilton Parklands project, without people needing to travel more than 15 minutes for employment.
- Provides health and education opportunities to integrate and broaden learning across all ages.

Wilton Parklands comprises approximately 550 hectares of developable land and is estimated to deliver over 5,400 residential allotments. One of the main features of Wilton Parklands is the formation of a new community around large lake with a 'Mixed Use Node' on the eastern and southern edges of the water body, which forms the 'Lake Precinct'. The lake is an integral part of the project due to their place-making qualities and multi-functional benefits to the future community, including:

- Activating a mixed use convenience shopping, entertainment and commercial activities, restaurants and cafés, education and recreation node, which is in an ideal location for a 'Smart Work Hub'.
- The Hub will offer residents an opportunity for teleworking in an alternate space to their offices or homes.
- The Hub will offer a wide range of facilities for corporate clients or casual users, including:
 - fast broadband
 - Wi-Fi
 - video conferencing
 - meeting spaces
 - Facilitating wide-ranging recreational and community benefits relating to water.
 - Providing quality environmental benefits in the management of the water cycle.
 - All of the above community building pillars are fundamentally connected to one another.

The main north-south Spine Road is aligned on the highest point of the site to create an impressive elevated entry that has views across the project, in particular the lake in the foreground and the Razorback Mountain Range on the outer boundary. The integration of new off ramps, on-ramps and bridges with this Spine Road will provide residents with a safe commute, which avoids freight traffic using the Picton and Hume Highway intersection.

Bradcorp want to continue working constructively with all levels of Government to achieve a timely and effective outcome of establishing Wilton Parklands to deliver an economic, social and environmentally sustainable new town in a rural environment.

5 GREATER MACARTHUR LAND RELEASE AREA

The Department of Planning & Environment (DoPE) has led investigations into the potential for urban development in the Greater Macarthur area. The investigations resulted in the following reports being produced to inform the GMLRI Preliminary Strategy & Action Plan:

- Biodiversity Assessment Report.
- Bushfire Assessment Report.
- Economic and Employment Analysis Report.
- Housing Market Needs Analysis Report.
- Resource / Mining Framework Report.
- Services Infrastructure Report.
- Social Infrastructure Assessment Report.
- Water Management Report.
- Strategic Transport Plan.

The work undertaken has “identified land that is suitable for urban development, the infrastructure required to support growth, and how Greater Macarthur would be connected to jobs and other services in other parts of Metropolitan Sydney.” (DoPE 2015). A Draft Vision Plan (Refer Figure 4) was also prepared that provides an understanding of the location of the developable land, employment land and the position of centres and strategic infrastructure items (roads, interchanges and a bus priority corridor).

The Government has identified the ability to deliver 35,000 homes in the Menangle Park and Mount Gilead area and a new town at Wilton. The DoPE is promoting the following to implement the vision for Greater Macarthur:

- Amend the State Environmental Planning Policy (Sydney Region Growth Centres) 2006 and include Menangle Park & Mount Gilead and Wilton as Priority Growth Areas.
- Investigate declaring Menangle Park & Mount Gilead and Wilton as Special Infrastructure Contribution Areas.
- Continuing to work closely with Wollondilly Shire Council, Campbelltown City Council, and NSW Government agencies to deliver new communities with homes, jobs, infrastructure and services, while protecting the environment and natural resources.

The Preliminary Strategy & Action Plan acknowledges that within the Wilton Priority Precinct (Refer Figure 4) there is significant land owner interest and local authority support for bringing forward a new town at Wilton, which will be proponent-led. The actions for delivering growth in Wilton are:

- Commencing the process of rezoning land at Wilton for urban development in partnership with Wollondilly Council;
- Defining thresholds for the delivery of infrastructure needed to support stages of population growth;
- Establishing infrastructure funding arrangements, such as through a Special Infrastructure Contribution; and,
- Establishing a planning and development pathway for land that is constrained by potential underground mining, to manage risks to Government and the community.

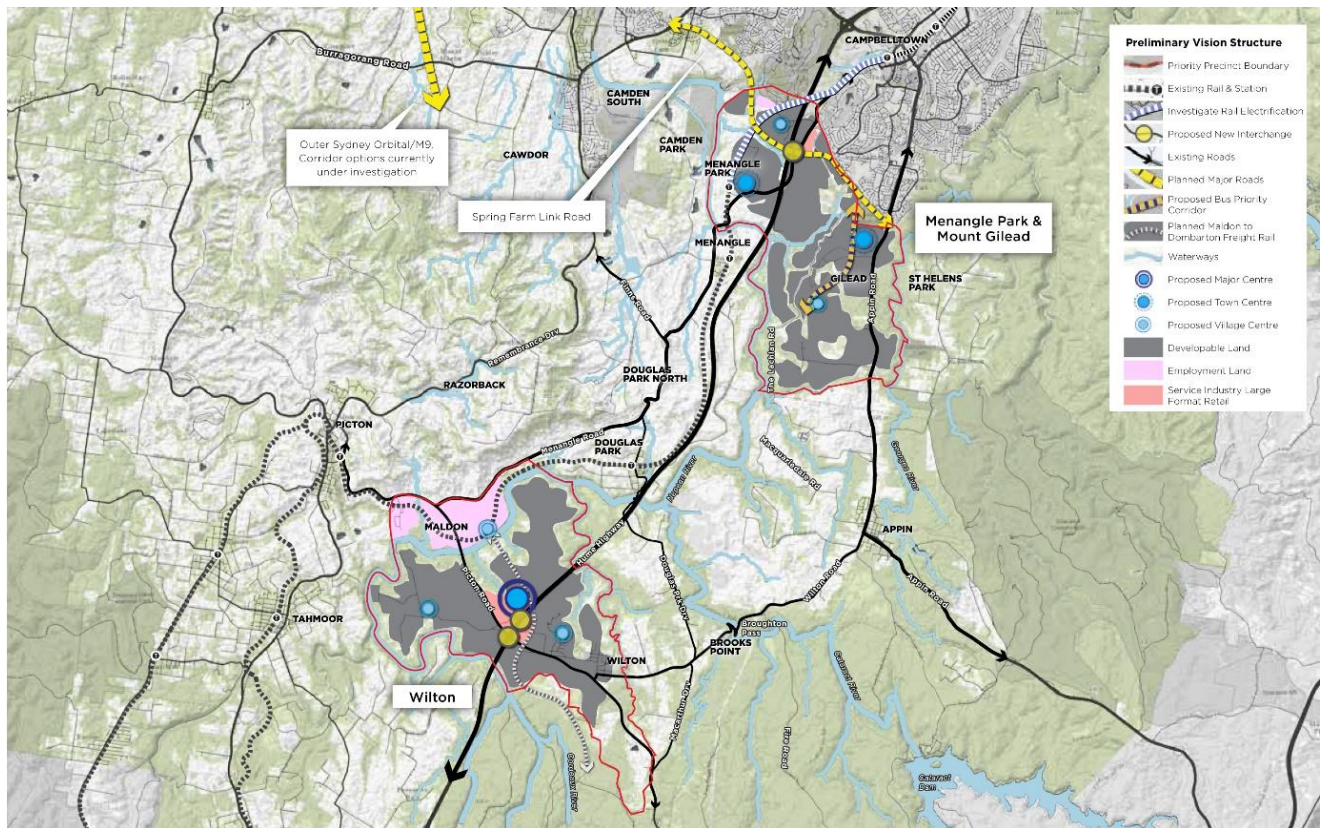


Figure 4: Greater Macarthur Vision to 2036 (Source: Department of Planning & Environment)

Overall, the release of the Greater Macarthur Land Release Investigation and the Preliminary Strategy & Action Plan is a positive and pro-active step by the Department of Planning & Environment and the NSW Government to address the housing supply and affordability issues being experienced in Sydney. The Greater Macarthur Region has the opportunity to achieve new towns and communities that have essential infrastructure delivered simultaneously to ensure they are connected to facilities and services that enable them to prosper.

6 RESPONSE ON GREATER MACARTHUR LAND RELEASE AREA

The NSW Government is commended for their vision to establish two new Priority Growth Areas and the foresight to deliver housing within two years

The work undertaken by the Wilton Junction Landowners in preparing the Wilton Junction Rezoning Proposal has followed an identical process as Precinct Planning within the Growth Centre. The work undertaken is extensive and supports the Wilton Junction Master Plan which has been evolved in consultation with Wollondilly Shire Council, the Department of Planning and various State Government agencies.

There is an opportunity for the Minister to release the Wilton Junction Precinct simultaneously with the establishment of the 'Wilton Priority Growth Area'. This would enable the extensive specialist investigation and reporting, which has amassed a cost of \$7 million to the Wilton Junction landowners, to be released for exhibition as the Precinct Planning package, as would occur in the same manner within the existing Growth Centres/Priority Growth Areas. Utilising the 'Precinct Planning' documentation that has been completed by the Wilton Junction landowners to date offers a unique opportunity for the NSW Government to expedite the delivery of development within Wilton Junction in a similar two year timeframe to that promoted for the proposed Menangle Park & Mount Gilead Priority Growth Area.

We have undertaken a review of the documentation released on exhibition and provide the following comments as feedback to the Department of Planning & Environment.

6.1 Preliminary Vision Plan

The Draft Vision Structure for Wilton shows the location of developable land, employment land, centres and infrastructure improvements (Refer Figure 5).

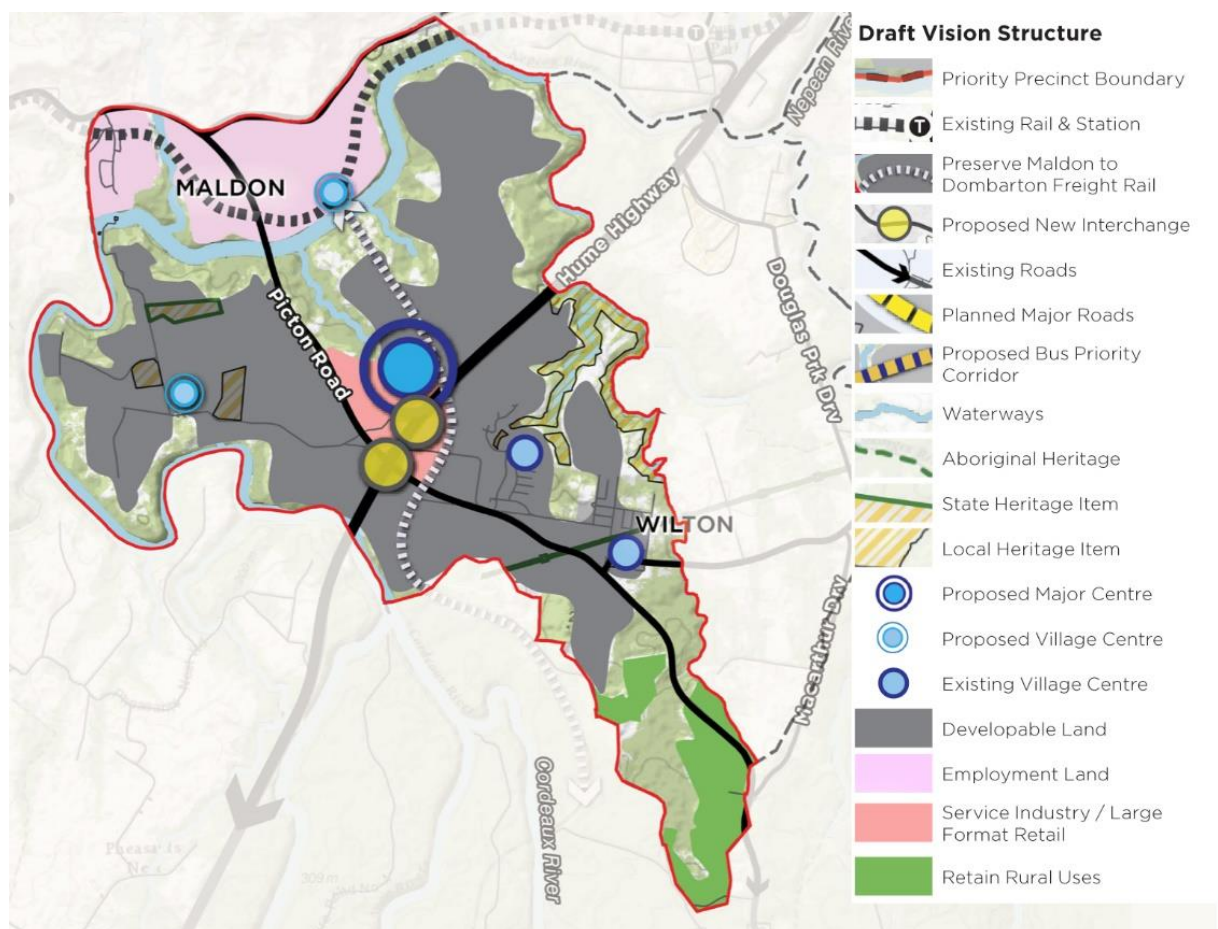


Figure 5: Draft Wilton Vision Structure

6.1.1 Developable Land

The mapping of the developable area shown on Figure 5 above is derived from the specialist studies undertaken for the Department for Planning. While it is understood that more refined mapping would be undertaken as part of a more detailed rezoning exercise, in the case of the Wilton Priority Growth Area, detailed mapping of the developable area has been completed as part of the Wilton Junction work by the landowners group in the preparation of the Wilton Junction Master Plan (Refer Figure 6).

This refined mapping is illustrated in Figure 7 and more closely resembles the boundaries of the developable land as shown on the Wilton Junction Master Plan. It is requested that the updated mapping be used for the final Wilton Priority Growth Area Structure Plan.

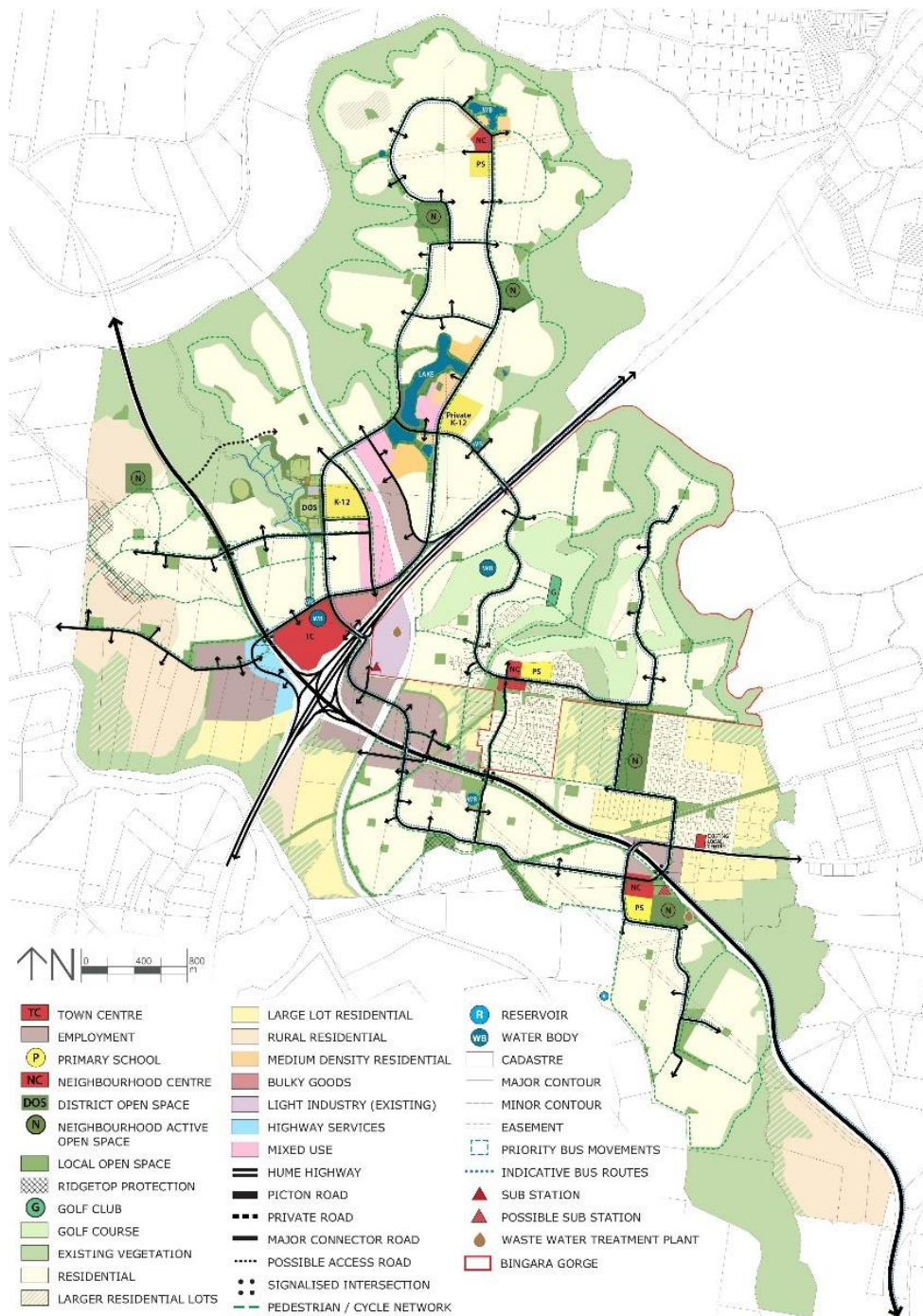


Figure 6: Wilton Junction Master Plan (Source: Connor Holmes)

6.1.2 Employment Lands

As part of the work undertaken by the landowners for Wilton Junction, there were employment lands identified adjacent to the Picton Road / Hume Highway interchange and adjacent to the town centre (Refer Figure 6). These employment lands have been identified based on achieving good access to the regional road network and to provide jobs for residents within Wilton Junction. Furthermore, there is land on the Bradcorp landholding adjacent to the proposed Maldon-Dombarton railway line that will provide convenient employment opportunities for local residents. The opportunity to establish local jobs can also be achieved through the identification of areas of 'Mixed Use', which can deliver higher per hectare job generation rates within a range of employment generating businesses.

It is noted in the Economic and Employment Analysis Report prepared by SGS Economics & Planning states that the job to working resident ratio in Wollondilly LGA is around 44 percent and the South-West subregion job to working resident ratio is 0.7. The job to working resident ratio for the GMIA was found to be 38%. The report acknowledges that this ratio is lower than the current 44% ratio within Wollondilly and compares below the ratios for Camden (57%), Campbelltown (62%) and Wingecarribee (83%).

The report recommends that a ratio of 1 job per household is extremely high (double the current Wollondilly rate) and that the GMIA should as a minimum meet the current 44% Wollondilly ratio, with a target ratio of 60% which is similar to the Campbelltown LGA.

The job ratio suggested by SGS Economics & Planning is supported and there is sufficient land within the Wilton Junction area to meet the minimum and suggested target. The Wilton Junction work has targeted a 70% ratio in line with the potential that derives from higher order levels of employment based upon it being a 'Garden City' and approaching the attributes of the nearby Wingecarribee Shire.

6.1.3 Proposed Centres

The Wilton Vision Structure identifies a Major Centre and two proposed Village Centres within the Wilton Priority Growth Area (Refer Figure 5), with a centre to the north within the proposed employment lands.

The Economic and Employment Analysis report prepared by SGS Economics & Planning on behalf of the Department of Planning & Environment determined the requirement for approximately 524,000m² of retail floorspace to accommodate the retail expenditure in the GMIA. Of this floorspace, approximately 100,000m² is allocated to villages. The report also envisages that the higher number of local villages are to provide access to daily shopping needs of the future residents.

The retail analysis undertaken for the Wilton Junction landowners By Macroplan Dimasi suggested the opportunity for three centres, with each able to support up to 5,000m² of floor space (perhaps more floor space with suitable market conditions). Two of these centres are within the Bradcorp landholding (Refer Figure 6). Both proposed village centres are adjacent to lakes, with the southern lake being a substantial recreational lake enabling a 'Mixed Use Node' comprising a range of land use activities such as convenience shopping, entertainment and commercial activities, restaurants and cafés. The 'Mixed Use Node' is not expected to compete with the Town Centre on the neighbouring land, rather complement the land use activities and provide a range of experiences for residents and visitors within the Wilton new town (Refer Figure 7).

It is requested that the Wilton Priority Growth Area Structure Plan reflect the location of the northern 'Neighbourhood Centre' and a 'Mixed Use Node' within the Wilton Parkland's project as illustrated in Figure 7.

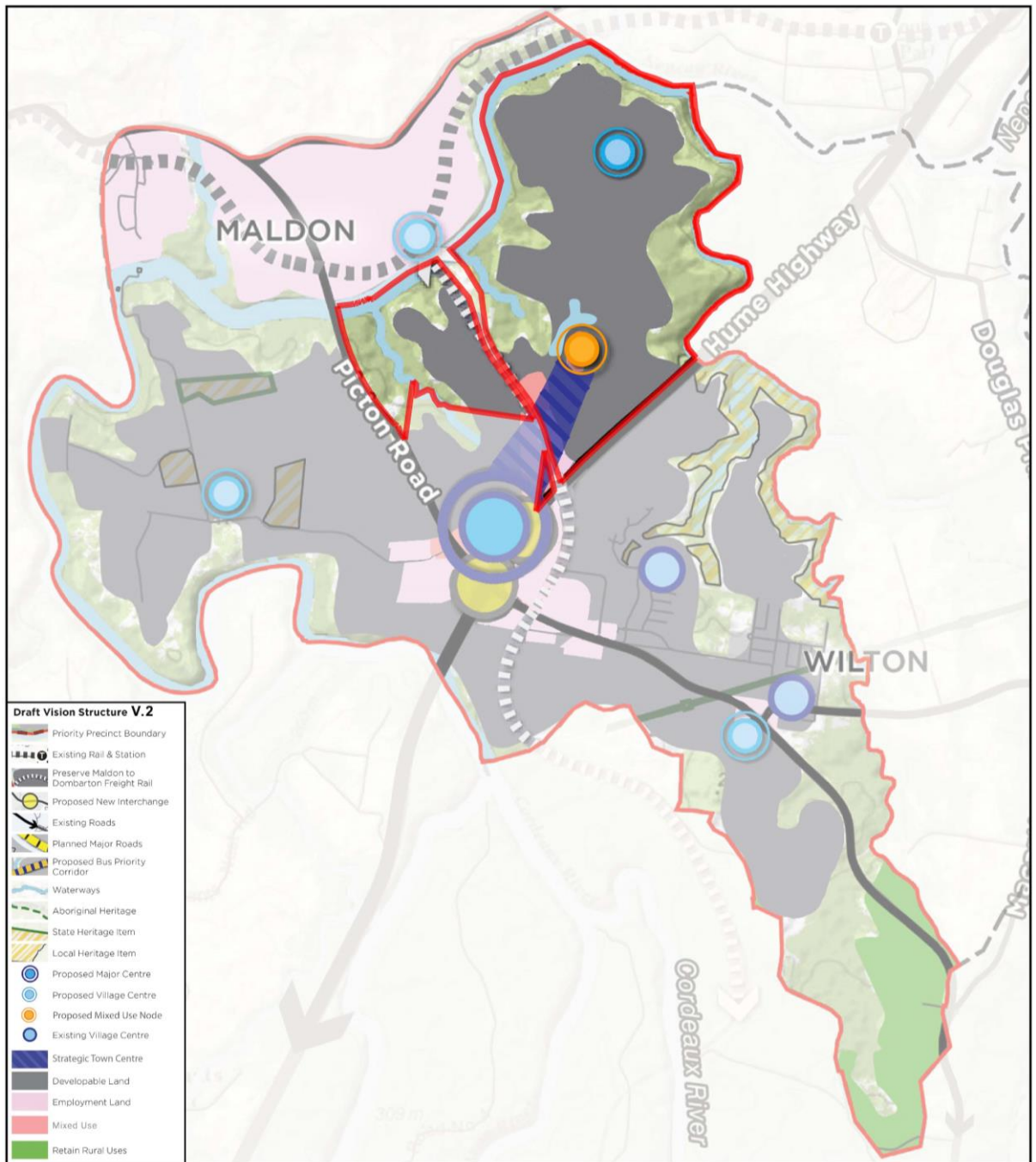


Figure 7: Proposed Wilton Vision Structure

6.2 Rezoning Process & Development Timeframe

The Land Use and Infrastructure Analysis Report outlines in Section 2 on page 5 the pathway strategy as outlined below.

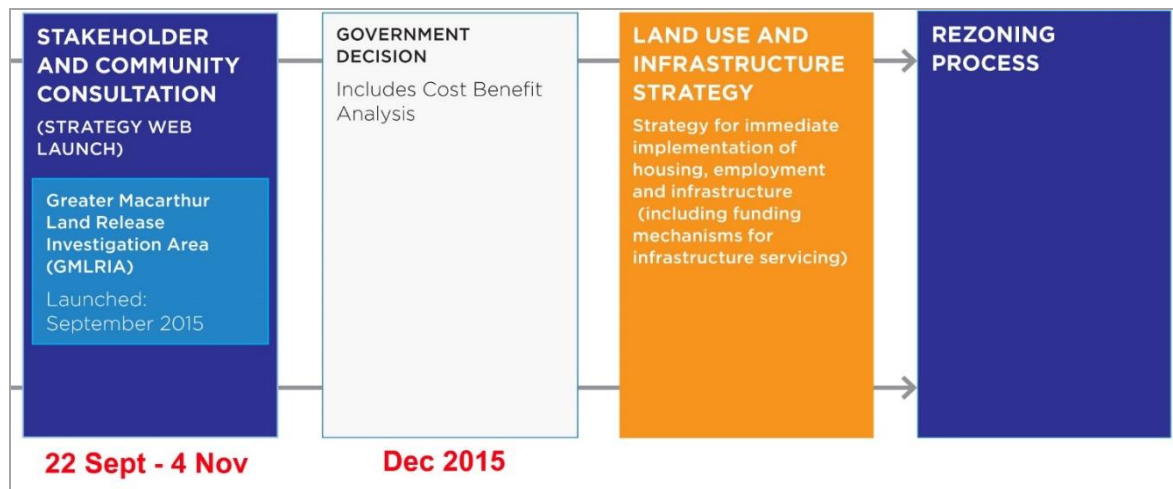


Diagram 1: Pathway Strategy

The Preliminary Strategy & Action Plan broadly outlines the Rezoning Process on page 8 which appears straightforward and mainly based on the existing rezoning processes within the established Growth Centres. While this is the standard approach to rezoning within the established Growth Centres, there is little detail on how the Government proposes to manage existing rezoning proposals that are well advanced and the pathway that they will take to achieve a timely zoning outcome.

There has been considerable time, financial investment and commitment by the Wilton Junction Landowners to advance the preparation of a Master Plan and rezoning proposal, including an infrastructure package for the coordinated delivery of development for their combined landholdings at Wilton Junction. It would be extremely disappointing if the rezoning pathway for the existing rezoning proposal is not allowed to progress as originally proposed.

There is nothing preventing the Minister for Planning from amending the Growth Centres SEPP to include the Wilton Priority Growth Area, then immediately releasing the Wilton Junction Precinct for rezoning and simultaneously exhibiting the Wilton Junction Planning Proposal. Considering the substantial investigative work by the Wilton Junction Landowners and that the work is ready to be publicly exhibited ahead of the announcement of the two new Growth Priority Areas, this would enable the Government to capitalise on the opportunity to advance the package to exhibition and achieve a timely rezoning in early 2016. Furthermore, the opportunity exists to deliver housing within the same two year period as stated for the proposed Menangle Park & Mount Gilead Priority Growth Area, which would require them to follow the same framework if they are to be rezoned according to the stated schedule.

The pathway suggested to advance the rezoning of land within the Wilton Junction Precinct is:

- Following Exhibition of the draft GMIA the Minister amends the Growth Centre SEPP to include Wilton as a Growth Centre. The Minister also adopts the Greater Macarthur Land Release Preliminary Strategy as the Structure Plan (as amended) to reflect the Wilton Junction Masterplan.
- In parallel the Department, in consultation with Wollondilly Council, finalises the draft planning instrument. The Wilton Junction proponents update the environmental report to reflect changes to Threatened Species listings.
- Minister releases Wilton Junction (excluding the village of Wilton & Bingara Gorge) for Precinct Planning (under CI 276 of EP&A Regs) adopting the Director General's requirements issued for Wilton Junction. The Minister instructs the Wilton Junction Precinct Planning documentation together with the Wilton Junction proponents offer of commitment for the provision of infrastructure to be exhibited as soon as practical.

- The infrastructure mechanisms (VPA) for Wilton Junction is prepared, exhibited and then finalised.
- Minister approves the amendment to the Growth Centre SEPP that amends Council's LEP.
- Growth Centre SEPP Gazetted and Wilton Junction precinct is zoned for urban purposes.

The opportunity exists for the Department of Planning & Environment to provide direction on how the process will operate for the Wilton Junction Landowner area. The remaining land areas within the Wilton Priority Growth Area that were not part of the Wilton Junction process would undergo a separate precinct planning process.

6.3 Rezoning Pathway Step - Coal Mining

When reviewing the documentation released in relation to the Greater Macarthur Land Release Investigation Area one of the main issues is the existing and proposed underground coal mining operations in the Appin and Wilton areas by Illawarra Coal. While there is a lease for coal mining operations within Wilton Junction, there are several observations that need to be acknowledged in relation to the mining activities, that is:

1. While the report states that mining will occur in the 15 to 30 year time frame it is not likely to commence for 25 years and continue at least until 35 years.
2. The evidence supporting these timeframes has previously been supplied to Government.
3. The direct economic benefit to the State of urban development at Wilton Junction (including Bingara Gorge) relative to mining is multiples of times greater than mining. Evidence of this has previously been provided to Government.
4. Employment deriving from urban development is estimated to be 11,000 permanent jobs and a work force employment of 1700 for the 20 year construction period of the urban development, which commences immediately. Employment in coal mining is a one off 10 year mining period in 25 years time, with no residual job creation.
5. The comparisons made in relation to the mining activities in Tahmoor are not relevant to the proposed mining operations in Wilton

It is clear that urban development must proceed ahead of mining and that the well founded conclusion in the mining report that the doubt about the future of mining beyond 15 years, in this case 25 years, should not prohibit urban development. Especially given the additional doubt of the viability of mining the thin coal seam below Wilton Junction

6.3.1 Urban Development / Mining Co-existence

The Greater Macarthur Land Release Investigation Preliminary Strategy & Action Plan estimates that approximately 50% of the proposed residential/developable land is encumbered. This perceived encumbrance is resolvable with appropriate measures.

Mining beneath the northern portion of the Wilton Junction Landowner area is likely to occur in 25 to 35 years, meanwhile the significant benefit to urban development at Wilton Junction to the State will be delayed unless urban development and mining are allowed to co-exist. Any delay to the development of land at Wilton Junction is unacceptable to the developer, particularly as there is no sound reason to delay due to mining.

There is demonstrated ability to design a range of buildings, structures and associated infrastructure required for the Wilton Junction Project that accommodate the potential for subsidence. With this foresight and appropriate attention to detailed design and construction supervision, combined with appropriate subsidence management strategies for the surface improvements during mining, impacts can be significantly minimised

While there has been some buildings and associated items of infrastructure affected by subsidence at Tahmoor, with few exceptions, these had not been adequately designed and built to accommodate subsidence movements. Many of the older buildings were built before the Mine Subsidence Board (MSB) was established and those buildings were clearly not designed to accommodate subsidence movements.

The neighbouring Bingara Gorge project being developed by Lend Lease has mining activities occurring under the development, with houses being built at present. For this project, the MSB provided the following design parameters for subsidence:

Vertical Subsidence	950 mm
Tilt	6 mm/m
Strain	2.5 mm/m

The design requirements of the MSB for Wilton Junction will be the same as those provided for the Bingara Gorge development as they are above the same long walls.

The costs of designing and constructing buildings to resist mine subsidence is estimated to be about 1% for houses and 3% for two storey reinforced concrete framed buildings (Bray & Branch, 1988).

Importantly, the Resource / Mining Framework Report by AgEconPlus Consulting prepared for the Department of Planning & Environment, indicated that;

*"In the longer term, 15-30 years, the certainty that mining will occur in a particular geometry or that a particular mine will continue to be operational tends to reduce because exploration activities are yet to be fully completed and the mine plans tend to be largely conceptual. Even though approval to mine has been granted, such approval does not guarantee an operation will remain viable. When this lack of certainty is coupled with the costs of delaying surface development, **the argument for forestalling surface development to accommodate future mining becomes less convincing.**"*

6.3.2 Wilton Priority Precinct – Rezoning Pathway Steps

The following sections relate to the process promoted in relation to coal mining outlined on page 8 of the GMLRI Delivery Pathway Section of the Preliminary Strategy & Action Plan.

1. Planning for early Exploration and Resource Extraction

No easements or covenants are required. The only consent that is required is from the landowner, which in the case of Bradcorp, consent has already been granted and exploration commenced by BHP Billiton. A staging proposal for completion of exploration is included in reports previously provided to Government

Surface gas drainage infrastructure can be located remotely from the urban development area within lands owned by South 32 along the western boundary of Bradcorp's land, which is identified in the GMLRI documentation as being for employment land uses. The location of surface vent infrastructure in this location will serve any mining operations irrespective of any proposed future mine plan

Accordingly, the need for endorsement for covenants and/or easements is superfluous.

2. Building Design Standards

Section 2 of the Pathway Steps on page 8 of the Preliminary Strategy & Action Plan relates to building design standards and compliance regimes and establishes how the subsidence impacts on the proposed development at Wilton Junction can be minimised. The MSB has existing design guidelines for residential development titled "Graduated Guidelines for Residential Construction (New South Wales)" and apply throughout proclaimed mine subsidence areas - these guidelines will also apply at Wilton.

In relation to non-residential land uses, guidelines need to be implemented to require that buildings be designed and construction supervised to provide for mine subsidence parameters of tilt, strain and curvature by relevant professional experts.

The MSB can determine the design requirements and provide subsidence parameters to the developers to ensure that the designs are able to accommodate subsidence movements with minimal impact. The designs of all buildings, structures and services within a Mine Subsidence District require the approval of the Mine Subsidence Board before construction can commence.

Bradcorp has provided advice to Government that details how the existing system can be improved and we refer the Department to that advice.

In relation to design parameters for non-residential buildings the MSB and Department of Mineral Resources has already adopted these parameters for the long walls for Wilton Junction.

The problems of managing the impacts are significantly reduced when the building structures and associated items of infrastructure are designed to accommodate subsidence movements. In addition to design measures, construction of the development need to be carefully controlled to ensure that the building structures and associated items of infrastructure are built in accordance with the designs.

To meet these challenges, surface development will comply with the requirements of Section 2 of the Pathway Steps relates to building design standards and compliance regimes.

3. Long Term Urban Land Release Sequencing Plan

The preparation of a Long Term Sequencing Plan for both the urban land release and approved resource extraction operations is irrelevant, in the circumstances where urban development precedes mining. Other landowners affected by mining will need to address the pathway step requirements independently, especially as they relate to the communication strategy applying to those owners.

4. Communications Strategy

A Communications Strategy for Mine Subsidence has been created by the Wilton Junction proponents and has been previously submitted to the Government. The Strategy meets the conditions of the Rezoning Pathway Steps for the Wilton Priority Growth Area by setting out actions to inform all potential purchasers of residential, commercial and retail buildings of future mining in the area and what this means for them.

6.4 Rezoning Pathway Step - Biodiversity

The rezoning pathway steps outline the requirement to fulfill the six step process for land that is biodiversity constrained.

In the case of Bradcorp's Wilton Parklands project there are areas that have been identified to be rezoned for development that contain biodiversity value. However, the comprehensive work undertaken as part of the Wilton

Junction rezoning proposal has substantially addressed all six steps listed in the Preliminary Strategy & Action Plan.

An Ecological Assessment and Environmental Offsets Strategy has been prepared and supplementary work undertaken which identifies approximately 325ha of natural bushland to be retained in a Trust with ongoing management.

While there is the need to negotiate an outcome on biodiversity offsets and resolution of the management arrangements prior to rezoning occurring, this does not prevent the Wilton Junction rezoning proposal from being exhibited.

6.5 Rezoning Pathway Step - Infrastructure Funding Mechanism

The Preliminary Strategy & Action Plan outlines that prior to rezoning an appropriate mechanism for funding of infrastructure is needed to support growth. The documentation acknowledges that the preferred mechanism is a Special Infrastructure Contribution (SIC), otherwise planning agreements between the Minister for Planning and respective proponents.

Bradcorp, as part of the Wilton Junction proponent group, has submitted a letter of commitment to fund the additional costs of government, which addresses the identified and agreed infrastructure cost of Wilton Junction. The associated infrastructure and related costs for Wilton Junction can be provided under a planning agreement.

We support the Government initiative to establish a SIC, similar to the existing Growth Centres, that provides equitable contribution towards reasonable regional infrastructure items. Bradcorp also support the ability to negotiate delivery of reasonable infrastructure items by entering into planning agreements with the Minister for Planning.

Bradcorp are committed to, and see the importance of, providing the necessary infrastructure in conjunction with delivery of housing and development of the Wilton Parklands project. The Wilton Priority Growth Area is larger than the Wilton Junction Precinct and therefore any additional costs to support the infrastructure requirements for the extended area need to be attributed to that area. The identification of additional area should be a matter that does not delay the rezoning process for the Wilton Junction precinct.

7 CONCLUSION

On behalf of Bradcorp, we commend the Government for the initiative and foresight to identify Wilton as a Priority Growth Area under the Growth Centres SEPP and taking bold and positive steps to expedite delivery of a new town at Wilton.

Bradcorp has been integrally involved in the preparation of the Wilton Junction Rezoning Proposal and have invested the most effort to ensure that the Wilton new town will be a highly sustainable community providing housing and many other benefits and opportunities that deliver outcomes within and beyond Wilton.

The suggested processes outlined in the Preliminary Strategy & Action Plan relevant to Bradcorp's Wilton Parklands project, such as mining and biodiversity have been investigated as part of the Wilton Junction Rezoning proposal and can be adequately addressed to the satisfaction of all stakeholders.

The preparation of the Wilton Junction Master Plan included considerable work by Bradcorp to prepare a Master Plan for their land that incorporates the 'Garden City' principles. Of particular note is the provision of a substantial lake with the opportunity to establish a 'Mixed Use Node' adjacent to the lake which will provide convenience shopping, entertainment and commercial activities, restaurants and cafés, education and recreation pursuits which will be a central focal point for the future community. It is requested that the Wilton Priority Growth Area Structure Plan adopt the work undertaken for the Wilton Parklands project.

We request on behalf of Bradcorp that the Government adopt the work undertaken by the Wilton Junction Landowners as part of the preparation of the Wilton Junction Master Plan and continue the rezoning process of the Wilton Junction Precinct and exhibit this precinct as soon as possible within the Wilton Priority Growth Area to enable the vision for the 'Wilton New Town' to be delivered.

Bradcorp are committed to delivering excellence and building on their demonstrated commitment to the Wollondilly Shire and South West Sydney area, having undertaken a number of highly successful projects over the past decades. Bradcorp wish to maintain their commitment and strong working relationship with the State Government, Council and all stakeholders to deliver Sydney's newest town.



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