

Submission on the:

Wilton South East Precinct Plan

Thank you for the opportunity to comment on the Wilton South East Precinct Plan.

I am excited by the opportunities this development represents for my community, the Wollondilly and the State of New South Wales.

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Regards,

Property owner in the Wilton Priority Growth Area

1. Growing a new smart city – not a new town

There are a number of reasons why increased density at Wilton makes sense.

1.1 More affordable homes

The fast-tracked release of home sites by the NSW Government is driving increased supply to put downward pressure on housing prices – a laudable goal. This logic, based on supply and demand economics, is a relationship which means the more houses and apartments there are the cheaper they will get. So let's build more.

1.2 Increased feasibility of government services

The most frequently cited reason for delayed implementation or refusal of critical services is a lack of population. Public transport, education, health and emergency services infrastructure depend on governments assessing local demand for such services. Everyone benefits from better services if we make Wilton bigger. The country feel is going to be lost regardless of density – the choice is between a smart city and under-served sprawling suburban ghettos.

1.3 Greater attraction of private sector investment

The retailers and enterprise land tenants will be looking for a large population that will consume their goods and services to make their investment viable. The recent experience of the SPAR supermarket at Bingara Gorge demonstrates the risk to the private sector and the community if population remains too small for too long.

Population density not only drives investment in bricks and mortar retailers but also in the rapidly growing service economy. For example, Wilton residents still pay additional postage rates compared to those in Sydney and Wollongong and services such as Eatnow, Deliveroo and Uber have little or no market penetration. Increasing density will make these private services viable thereby increasing the amenity for existing and new residents.

1.4 Combatting sprawl

Sydney's rapidly growing population means more houses will be required. Wilton provides the ideal opportunity to build a master planned city that is contained within scenic gorges and overlooks stunning rural vistas. The alternative is to carpet those stunning rural vistas with oversized, cookie-cutter houses that will destroy the character of the Wollondilly.

1.5 Increased developer contributions

Increased density will create further value uplift for the major landowners (Walker, Bradcorp, Lend Lease and Governor's Hill) which can be captured to fund more infrastructure than is currently possible with the level of developer contributions proposed under the strategy. This would be a good way to address infrastructure deficits in the current Draft Land Use and Infrastructure Strategy.

2. Reducing harm from storm water

The current creek system running adjacent to Picton Road to the east (see creek highlighted by a red circle on the map below) is prone to minor flash floods which occur two to three times a year and pass through the landscape within 24 hours. The low risk of the creek is shown in the background analysis report as it does not have a 100 ARI flood risk.

Figure 1: Area to be impacted by increased flash flooding threat¹



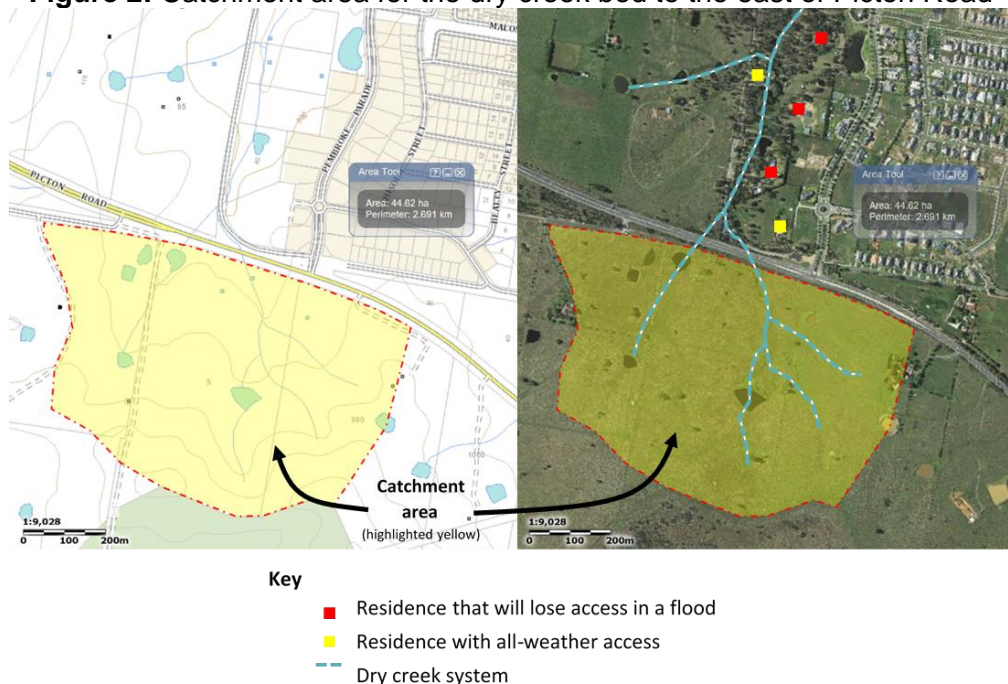
This is set to change. The background analysis identifies the potential negative impacts created by the urbanisation of agricultural land:

While urban development will reduce pollutants from agricultural uses, it could increase the velocity and pollutant load in stormwater runoff. Appropriate measures will be required to manage stormwater flows...²

The report commissioned by the major land owners identified that ‘there are a four (4) of the catchments south of Picton road that are up to 20% greater than 40 ha’.³

One of those catchments will direct massive amounts of stormwater into a dry creek system that is wholly unsuitable for those flows. The figure below highlights the size of the catchment that exceeds 40 ha (at 44.62 ha) and is even larger when the creek is joined by the catchment to the west of Picton Road.

Figure 2: Catchment area for the dry creek bed to the east of Picton Road⁴



¹ Figure 12: Watercourses and flooding, extracted from the “Wilton: Interim Land Use and Infrastructure Implementation Plan Background Analysis”, pg 27.

² Extracted from “Wilton: Interim Land Use and Infrastructure Implementation Plan Background Analysis”, pg 26.





³ J. WYNDHAM PRINCE, “Wilton Junction – Water Cycle Management Strategy”, page 43

⁴ Topographical map and aerial imagery sourced from NSW Government Spatial Information Exchange.

2.1 Unstable stream systems

The major land owner's report assessed the stream / dry creek bed running adjacent to Condell Park Road and identified a number of features that will become weaknesses as flash floods increase in frequency and severity.

Figure 3: Stream Assessment⁵

80	Upstream		<ul style="list-style-type: none"> - Defined bank 2 m wide through properties (approximately 0.5 m high). - Dense vegetation downstream of pipe culverts. 	-	-
81	Downstream		<ul style="list-style-type: none"> - No defined channel. - Very wide natural depression/flowpath. - Cropped pasture grass. 	-	-
82	Upstream		<ul style="list-style-type: none"> - Very wide flowpath through properties drains to man-made farm dam . - Short grass. - Full riparian corridor downstream of farm dam. <p>- Note: Photo taken from fence line due to restricted site access.</p>	N	N
83	Downstream		<ul style="list-style-type: none"> - Meandering creek. - Dense riparian vegetation. - Recently embellished riparian corridor under bridge crossing at Bingara Gorge. 	-	-

At sites 81 and 82 the very wide natural depression / flowpath will cause flood waters to disperse pollutants very widely across the pasture preventing grazing of animals or urban development. The very wide flowpath is also at risk of erosion as it is only protected by short grass. The full riparian corridor beyond the dam and extending through site 83 is likely to sustain the increased storm water due to its rocky banks and greater depth.

⁵ J. WYNDHAM PRINCE, Wilton Junction – Water Cycle Management Strategy, Appendix G – Stream Assessment, Assessment of Riparian Corridors Proposed for Removal

2.2 Flash flooding impacts must be mitigated by the major land owner

The major land owners' report identified a strategy to limit catchments to just under the safe limit of 40 ha to reduce their costs in managing storm water and runoff that they are generating:

[C]areful consideration will be needed in master planning and detailed design of the road layouts and associated street drainage infrastructure so that these catchments are limited to 40 ha wherever possible. This will ensure that a traditional road and street drainage system will deliver the safe passage of flood flows to the sites major watercourses. This approach will also ensure that acceptable size and cost of pipe infrastructure can be delivered and that trunk drainage reserves are avoided.⁶

I firmly believe that designing up to tolerance levels on storm water management will expose the residents along this creek to an unacceptable level of risk to assets, livestock and personal safety.

Potential strategies to improve the stream capacity could include 'make good' works such as the creation of a deep, vegetated storm water channel (or trunk drainage) with an all-weather, car-accessible bridge for each property owner along the creek. The strategy should also include the removal of any farm dam that is found to be at risk of failing due to frequent floods that are known to undermine dam walls.

Whatever the design, it is vital that the proponents for Wilton South East are accountable for mitigating the negative externalities they cause to occur, beyond the land they own.

2.3 Unacceptable risks

The Wilton South East development will greatly increase the volume and velocity of the stormwater draining into the fragile dry creek bed adjacent to Condell Park Rd. This presents a number of risks to residents along this creek with the increased frequency and severity of flash flooding, including:

- Complete loss of access to the primary residence on three properties that currently rely on low bridges
- Loss of access to as much as 80 per cent of some properties that will be divided by the creek when it floods
- Wide surface dispersal of pollutants, well beyond the creek's current high water level
- Erosion of creek beds and loss of top soil with an associated increase in the sediment load in dams along the creek line
- Damage to infrastructure such as driveways, paths, fences, dams, gardens and animal enclosures
- Potential for an underground concrete water tank, adjacent to the creek, to float and/or shift when flooding events become more common.

⁶ J. WYNDHAM PRINCE, "Wilton Junction – Water Cycle Management Strategy", page 43

3. Unlocking urban capable land to the East of Condell Park Rd

The planning process is being strongly influenced by the major landowners within the Wilton growth area. This is understandable given their resources, experience and knowledge of government processes. There is, however, a significant section of land fronting Condell Park Road which does not seem to have been given a precinct name. It does not appear to have been included in Bingara Gorge nor in Wilton South East.

It is correct that the land to the east of Condell Park Rd has been identified as urban capable, given that it is intended to be surrounded by dense housing at Bingara Gorge and enterprise land is being explored across the road. It is untenable that landowners in this pocket of urban capable land should have to suffer the negative impacts of development for an indefinite period of time while being stuck with existing land uses themselves.

The land is clearly not within the scope of rural residential, which is defined in the background analysis: as being

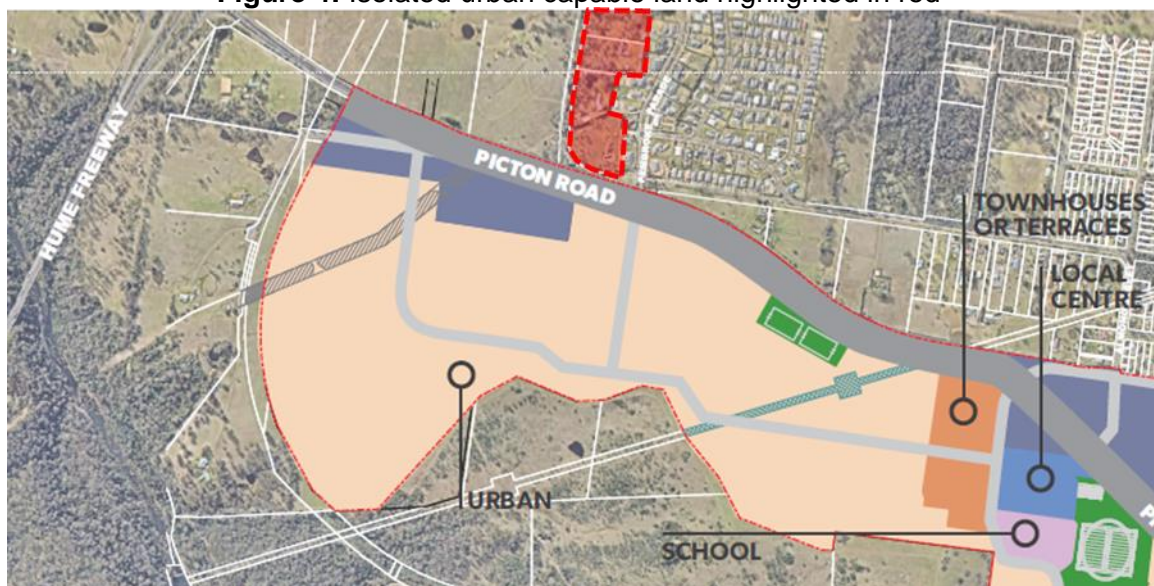
Rural residential

Land with lesser development capability is suitable for large lot rural residential housing to protect environmental values and provide a transition to the surrounding rural areas or bushland.⁷

The land east of Condell Park Road has excellent development capability with close proximity to the town centre in Bingara Gorge and the major centre planned on the Governor's Hill land. There are also no surrounding rural areas or bushland which could make transition necessary.

The urban capable land on Condell Park Road should be progressed alongside the Wilton South East precinct to ensure the entire eastern side of the Hume Freeway is delivered in the same stage or phase of development. The early development of the land adjacent to Condell Park Road would also support the delivery of the additional Hume Freeway exit and bridge over Picton Road (both of which occur within the Condell Park Road area).

Figure 4: Isolated urban capable land highlighted in red⁸



⁷ Extracted from the "Wilton: Interim Land Use and Infrastructure Implementation Plan Background Analysis", pg 36.

⁸ Extracted from the "Wilton: Interim Land Use and Infrastructure Implementation Plan Background Analysis", pg 37.

The major landowners report's proposed the accelerated development of properties surrounding Condell Park Rd and I would support their approach to scheduling which should be reflected in the Wilton Interim Land Use and infrastructure Strategy and the precinct plan for Wilton South East.

Figure 5: Timing of Stages⁹

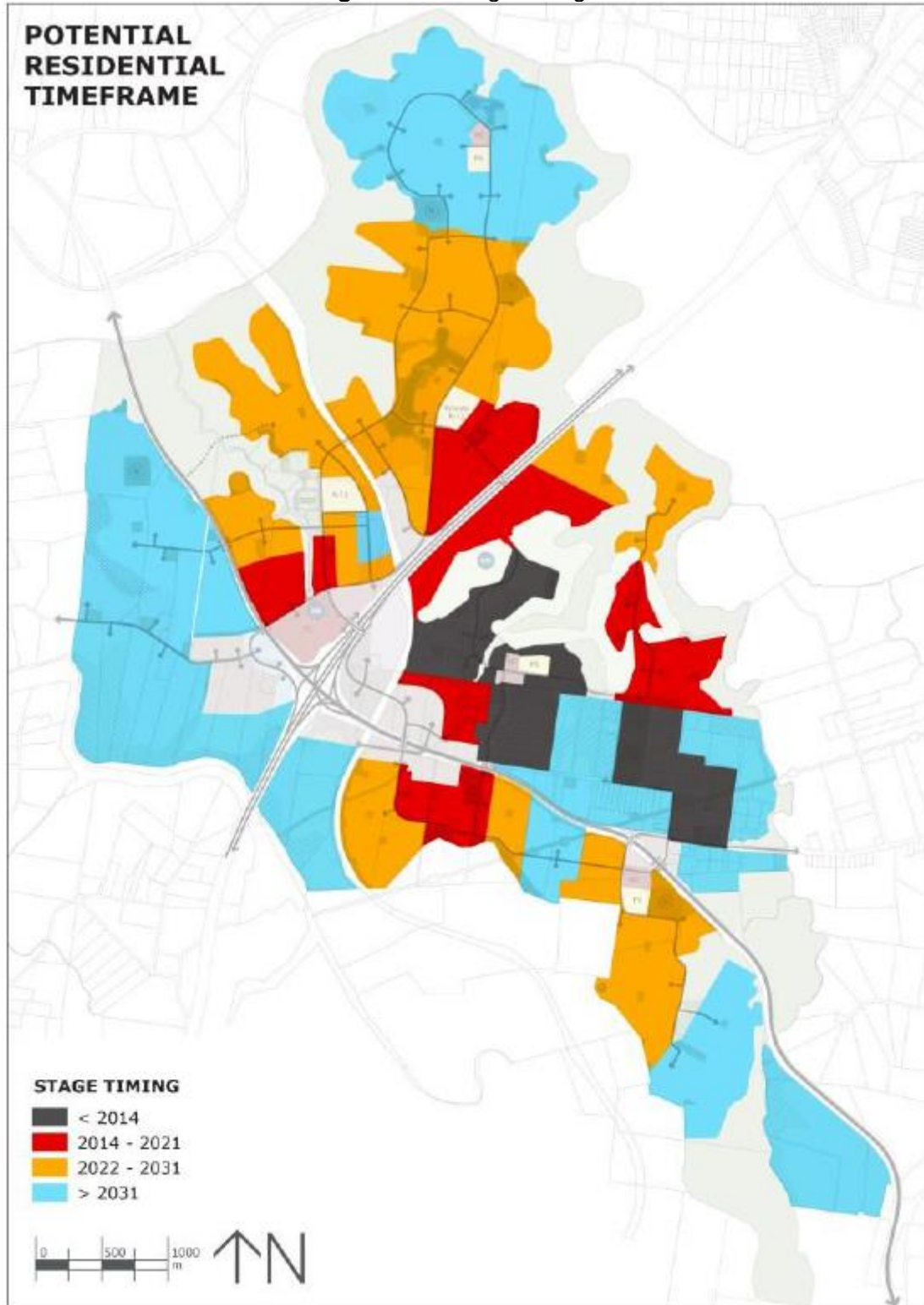


PLATE 14.1 – TIMING OF STAGES

⁹ J. WYNDHAM PRINCE, "Wilton Junction – Water Cycle Management Strategy", page 68

4. Representing biodiversity accurately and consistently

There are established ornamental gardens and tree studded pasture to the east of Condell Park Rd and to the West of dense urban development at Bingara Gorge.

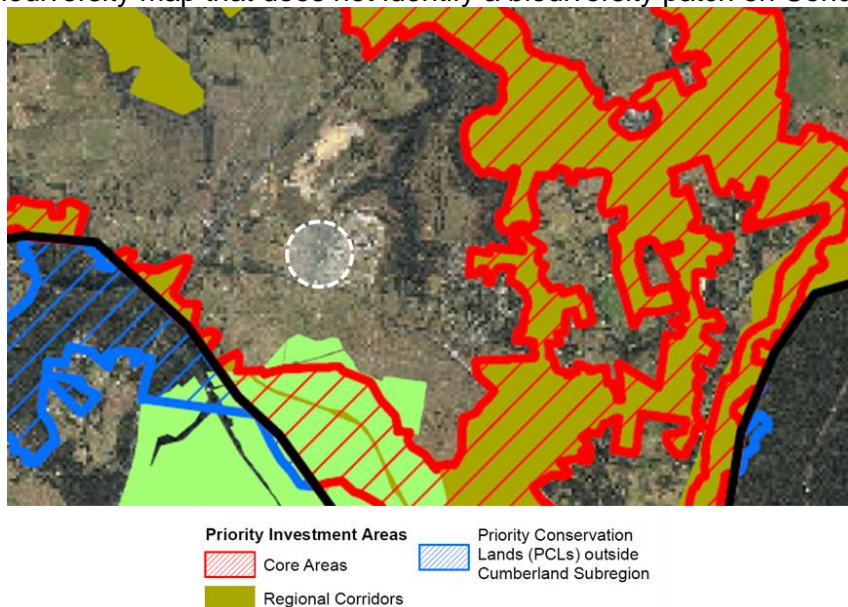
The Wilton: Interim Land Use and Infrastructure Implementation Plan Background Analysis Biodiversity map misclassifies these gardens and pastures as a biodiversity patch to be assessed at precinct planning stage (the area is indicated on the map below with a red dashed circle).

Figure 6: Map that incorrectly identifies a biodiversity patch near Condell Park Rd¹⁰



I reject the assertion that this land is a biodiversity patch and request that the next iteration of the Land Use Infrastructure Strategy remain consistent with the NSW Office of the Environment papers “The Cumberland Plain Recovery Plan” and the “Cumberland Subregion Biodiversity Investment Opportunities Map” by removing the constraint from future maps. The investment opportunities map is extracted below to highlight the area of gardens and pasture which are neither “core area” nor “Priority Conservation Lands” (indicated with a white dashed circle).

Figure 7: Biodiversity map that does not identify a biodiversity patch on Condell Park Rd¹¹



¹⁰ Figure 9: Biodiversity, extracted from the “Wilton: Interim Land Use and Infrastructure Implementation Plan Background Analysis”, pg 18.

¹¹ Cumberland Subregion Biodiversity Investment Opportunities Map

The ecological study behind this project conducted two spot assessments of the area in question and did not find high conservation value.

Figure 8: Low conservation value identified in spot assessments¹²



Spot Assessment 29

- Regrowth Forest Red Gum and Wattles with some Blackthorn and a mainly exotic groundcover

Spot Assessment 30

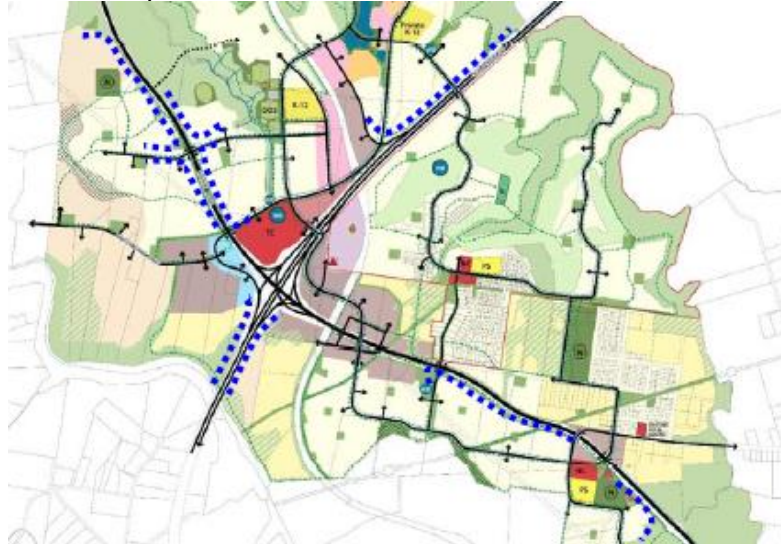
- Forest Red Gum – Stringybark with a maintained lawn

¹² Extracted from Cumberland Ecology, "Over-the-Fence spot assessments during the SLR Ecology 2013 surveys at Wilton". Page v.

5. Treating increased road and rail noise

The major landowner's have failed to give due consideration to the noise treatment of land beyond their ownership and direct control. This is wholly inadequate given this is a planning process being delivered by the State Government for the benefit of current and future residents of the new smart city at Wilton. Of major concern is the urban capable land adjacent to Condell Park Road.

Figure 9: Sound barrier placement does not consider land to the North of Picton Road¹³



There is an opportunity to build sound barriers that are visually similar to those already to the north of Picton road for the Bingara Gorge development. The use of industrial land to reflect and absorb traffic noise is no longer feasible for Picton Road, as urban capable land will be adjacent to the source of the noise.

Similarly I call on the planners to provide sound barriers for the rail line so that all residential areas to the east of the line are insulated from the impacts of noise pollution.

Figure 10: Sound barrier placement does not consider land to the east of the rail corridor¹⁴



For smaller landholders, the noise impacts will continue to be made worse by the increased traffic created by development and yet there is no capacity for them to erect the appropriate treatment measures close to the source of the noise. This is why master planning exists.

¹³ Atkins Acoustics, "Wilton Junction Master Plan: Noise and Vibration Management Assessment", page 25.

¹⁴ Atkins Acoustics, "Wilton Junction Master Plan: Noise and Vibration Management Assessment", page 34.

6. Ensuring high-capacity freeway access

The signalled intersection of Picton Road and the Hume Freeway is barely functioning with current traffic levels. In the morning traffic regularly queues back towards Pembroke Parade.

Wilton South East and the continued development of Bingara Gorge will grow the number of vehicles to the point that the intersection will simply fail to function. This is the only viable link to Campbelltown, Western Sydney and Sydney City and without mass transit there will be no choice but to drive.

The upgrades to the interchange that allow freeway traffic to access Wilton South East and Bingara Gorge should be delivered with the first release of lots at Wilton South East. Likewise the ramp that will allow traffic from the east to access the Hume Freeway (northbound) without signals should be delivered at the same time.

While there will be a significant upfront cost. The amenity of the area would be improved leading to greater total land sale revenue for the developers.

7 Delivering public transport infrastructure

Mass transit public transport is the only way to get a large number of people from one place to another. The space taken up by cars on the road and in parking spaces at the origin and destinations makes them inherently inefficient, especially when there is only one or two passengers.

Busses may be a good start for the area to link with Campbelltown but they do not provide a signal to home buyers that the Government is committed to their mobility needs. Busses are also constrained by traffic created by other vehicles. Therefore rail is a superior option with dedicated easements and a main line running through the Wilton development area (near Maldon).

7.1 Value capture can fund rail infrastructure

Governments around the world are exploring the benefits of value capture as a way to fund the provision of infrastructure. The Assistant Minister for Cities, the Hon Angus Taylor MP has been tasked with exploring value capture at the Federal level and is also the member for Hume which includes the land being investigated at Wilton. This is a fantastic opportunity to trial this innovative solution to address the infrastructure deficits evident in the interim land use and infrastructure strategy. Electrified passenger rail connecting Wilton to Wollongong and Campbelltown would cause a value uplift that might be able to offset most, if not all, of the capital investment required.

This opportunity at Wilton has been independently identified by a number of private sector investors, including Centurion Group and Consolidated Land and Rail Australia (CLARA).¹⁵

The Centurion proposal is particularly exciting given its potential to be implemented quickly without waiting for agreement between the east coast states and the ACT. Details of their proposal were submitted to the Maldon-Dombarton call for submissions but were not made public. Information was shared at the Federal Standing Committee on Infrastructure, Transport and Cities which highlighted the potential for high speed rail between Wollongong and Sydney supported by value capture at Wilton.¹⁶

7.2 Conventional commuter rail

An electrified suburban line terminating at Wilton or Maldon would be a complete game changer for the Wilton development. Electrified passenger rail to Wollongong would be even more impactful (as suggested in the South West – Illawarra Rail Link project conducted by researchers at the University of Wollongong).

Public transport will reduce pressure on an already congested Hume Freeway / M5 and reduce the number of cars that enter Sydney and its satellite cities. Local employment is not a substitute for efficient mass transit.

7.3 High speed rail corridor

The corridor for high speed rail should be preserved, as identified by Infrastructure Australia. This is particularly important for Wilton as it may have the opportunity to benefit from a high speed rail station.

¹⁵ <http://www.smh.com.au/nsw/fasttrain-bonanza-big-investors-in-race-to-build-major-new-sydney-rail-projects-20160624-gpqua1.html> and <http://www.wollondillyadvertiser.com.au/story/4802034/high-speed-rail-will-revolutionise-shire/>

¹⁶ Standing Committee on Infrastructure, Transport and Cities
<http://parlinfo.aph.gov.au/parlInfo/search/display/display.w3p;query=Id%3A%22committees%2Fcommrep%2Fda59c830-e3fb-473c-b883-75f9a12cd247%2F0005%22;src1=sm1>

8. Building supermarkets for the health of residents

Wilton South East appears doomed to repeat the mistake made by the developers at Bingara Gorge that made shop space available for a convenience store when the residents of Wilton required a full-line supermarket from the likes of Woolworths or Coles.

The town plan for Wilton South East sets aside 2,500m² which was large enough for a supermarket in 1990.¹⁷ Woolworths submitted to the Productivity Commission in 2010 that a store with sufficient fresh food would require at least 3,200m²:

In recent years, Woolworths supermarkets have been increasing considerably in size - the average size of a new Woolworths full-line supermarket has increased from approximately 2,400 m² to 3,200 m² over the last 20 years. The growth in store size is a reflection of changing customer needs, customer sophistication and the more discerning eating and shopping habits of Australian customers. More specifically, the customer lead drive to move to larger supermarket footprints has resulted from the introduction of extensive fresh food departments in supermarkets requiring additional floorspace that was not required when supermarkets were more focussed on packaged groceries.¹⁸

We cannot afford to create a food desert which only provides residents with access to processed foods and fast food takeaway. The costs to the hospital system from obesity, diabetes and co-morbidities require planners to make preventative health a consideration from the beginning. Waiting until the Wilton Town Centre develops organically is not acceptable.

¹⁷ Woolworths Limited submission to the Productivity Commission Performance Benchmarking of Australian Business Regulation: Planning, Zoning and Development Assessments, 28 September 2010.

¹⁸ Woolworths Limited submission to the Productivity Commission Performance Benchmarking of Australian Business Regulation: Planning, Zoning and Development Assessments, 28 September 2010.