

Comments Re Wilton New Town proposals.

Please find below my concerns and comments about the information published in the Interim Land Use and Infrastructure Implementation Plan for Wilton, the accompanying Background Analysis, and the Wilton South East Precinct. The South East Precinct is an integral part of the entire Priority Growth Area so I do not understand why this precinct is being planned, rezoned and implemented separately from the rest of the Growth Area.

My comments relate to the entire Growth Area Strategy and this includes the South East Precinct.

1. **Road Congestion.** All roads in and out of the Growth Area will enter/depart Picton Road. Currently this road carries a heavy traffic load, due to local traffic and the increasingly large number of heavy trucks travelling to and from Port Kembla. This traffic load will increase further in the next 2-3 years even without the new town, since development in Picton and surrounds is not being delayed because of the Wilton development. Additional traffic due to 15,000 homes will make it extremely difficult to negotiate Picton Road, even with road widening, and create a bottleneck at the junction with the Hume Highway. A direct exit from the Growth Area onto the Hume Highway would ease part of the problem for Picton Road but also risks shifting the bottleneck problem further up the Highway. I realise the Department of Planning is expecting most people to find jobs locally and so not have to commute. This is most unlikely to happen (see Point 3 below). Many people will need to source employment in Wollongong, Campbelltown and points north, including the new airport. *I believe the only sensible solution for commuter movement out of the area is to provide new residents with access to rail.*
2. **Rail Transport.** There is no plan for rail transport in the Infrastructure Implementation Strategy, although rail is the best way to get both cars and freight off the road. A corridor is being kept open for the putative Maldon-Dombarton Freight line, which would connect with the existing rail line and carry passengers and freight to the main employment centres of Wollongong, Campbelltown and the new airport. However, there is no plan, even long-term, to construct this rail line. This is very short sighted. A rail line would provide a much needed alternative to cars and trucks, and could be an important attraction for any types of manufacturing industries that are expected to set up. In its absence, Picton and Douglas Park Train Stations are the only existing points where residents of the new town could access rail. Parking at Picton Train Station already exceeds demand, and there is very little parking in surrounding streets. Douglas Park Station can't even be accessed directly from the new town. There are three possibilities for providing rail access to Wilton: i) complete the Maldon-Dombarton rail line as a priority (the most useful option), ii) construct a link road directly to Douglas Park Station, or iii) construct a new train station in the Maldon precinct for the existing rail line. One further consideration: in the 21st Century, with climate change a reality, why would there be no provision for a town of 40,000 residents to access rail as a means of reducing its carbon footprint? *The Planning Department should urgently reconsider the need for rail and prioritize the Maldon-Dombarton line.*
3. **Employment.** The employment objective seems to be to provide one job for every household within the Growth Area (15,000 homes, 15,000 jobs). Firstly, most households these days cannot afford to have only one member employed. So one job per household, even if it is achieved, will not be sufficient to maintain the 'self-containment' principle

espoused by the Planning Department. Inevitably, many residents would have to commute out of the area, contributing to the traffic issues raised above. Secondly, it is difficult to see how the Planning Department expects that 15,000 jobs will be created when towns such as Picton have struggled unsuccessfully for years to provide jobs for their residents. The Planning document states that the pace of residential construction will be monitored and controlled to ensure it keeps pace with jobs growth. However, jobs growth won't precede housing construction. Developers will be unwilling to wait, possibly for years, before finishing their constructions. *Once development approval for a sub-precinct is given how will construction be reined in if jobs growth does not keep pace?*

4. Infrastructure implementation plan. The list of infrastructure items and anticipated implementation times (Background Analysis Sec.7) is no more than a wish list for the new town. It contains no definite dates, even by year, and no cost estimates for any of the infrastructure mentioned. The only item which has to be in place before construction starts appears to be upgrade of the Pembroke/Picton Rd intersection. Too many of these items are either 'to be determined' or 'to be modelled'. Yet construction of the first homes in the South-East Precinct is planned to start within the next 6-12 months. I do not consider that this implementation strategy has yet reached the stage where it can be called a real plan. It appears to be only general guidance. *Estimated dates and costs must be provided.*
5. Dependence on developers for infrastructure. The major landowners will be responsible for most of the infrastructure. What are the penalties if they fail to deliver these items? Developers can go broke. We have already seen this happen in Picton. Council is always short of money, especially given the size of the Wollondilly Shire and its demands. So Council is unlikely to be in a position to complete essential infrastructure. What is the contingency plan in these circumstances? What about items such as parks and walks, necessary for a liveable environment? These items are often delayed indefinitely or jettisoned when developers are looking for more profit. *What guarantee will the community have that all infrastructure and items planned for a liveable environment will be delivered by the developers at the same pace as housing construction?*
6. Sewage Treatment Plant. The Priority Growth Area includes the Sydney Water Catchment and Nepean River and several of its creeks. However, the list of required infrastructure does not mention wastewater treatment. The Wilton South-East Precinct document states that a Temporary Sewage Treatment Plant will be required. When? Surely this is needed immediately, given that the South East precinct is in the Sydney Water Catchment Area. For the other precincts at least one new wastewater treatment plant will be needed and possibly two. They are not mentioned in the list of required infrastructure (Background Analysis Sec 7). *When will wastewater treatment plants be required and where will they be located within the Growth Area?*
7. New High School. The list of infrastructure items (Background Analysis Sec 7) states that a new High School will only be required when Picton High School exceeds its capacity. However, the same document states (Sec 5.13) that "the only Government High School in Picton is already at capacity meaning children in the Priority Growth Area will have to travel further to access secondary education". *Since a High School for the new town will be needed very soon why is an estimate for its construction time not included?*

8. No minimum lot size. I am astonished that the Department of Planning would propose a town of 40,000 people with no minimum lot size for the entire Growth Area. This is apparently intended to promote diversity of housing. It will actually be an open invitation to developers to cram as many homes as possible onto the tiniest of sites. In effect, you will be promoting construction of a ghetto of apartments and terrace houses – a slum for the future. Should Council choose to intervene, developers would have strong justification for appealing to the Land and Environment Court. *Please delete 'no minimum lot size' from the plans and ensure that there is a very clear explanation of the range of lot sizes which must be included by developers.*

9. Creation of a heat island. The Background Analysis document points out (Sec 5.9) that the high daily temperatures experienced in the Wilton area will present 'an ongoing challenge' for the development. Small lot sizes, dense housing and paved surfaces will lead to even hotter days for longer periods and heavy demand for heating and cooling. Factors which can help reduce this 'heat island' effect are green spaces and trees. However, unless green spaces and significant new plantings of trees are required up front in plans for the Growth Area, they will either not be included by developers or will only be tokens. Anticipated small lot sizes mean most home gardens will not support trees. *The planning document should specify the area in hectares that will be needed for parks and reserves, and require the planting of new trees in all developments and along roads, possibly even specified as number of trees per hectare.* This would be in addition to the land already identified around the waterways as conservation land. There will be no significant cooling effect from green spaces and trees unless they are distributed evenly throughout the entire Growth Area.

My greatest concern for this Growth Area is that it will become another densely packed, soulless, hot, dormitory suburb of Sydney, where people struggle to find work and spend hours commuting for employment, education and entertainment. Too much essential infrastructure is left in the hands of developers. If jobs growth is slow, and housing construction is delayed as a consequence, those who have already moved to the area will find themselves hung out to dry, with necessary infrastructure not proceeding.

One final comment: this development is expected to encourage 40,000-50,000 people to move into the Growth Area. If this eventuates, the 'town' would become one of the top 35 largest cities in NSW, larger than Griffith, Tamworth or Orange. If the Planning Department started calling it Wilton City then the importance of the issues I have raised might become much clearer!

Thank you for the opportunity to present my comments and concerns. I hope they will be considered. There is a lot of potential for this new development to be a great example of how to develop a modern small city, provided the vision is accompanied by appropriate, enforceable and timely regulations and requirements for creating a liveable environment.

Mary Campbell

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