Brett Whitworth
Executive Director, Strategic Planning and Programs
Department of Planning and Environment
23 Bridge Street
SYDNEY NSW 2000

20 September 2017

Dear Mr. Whitworth

Submission: Wilton Priority Growth Area Interim Land Use and Infrastructure Implementation Plan

Bradcorp welcomes the ILUIP and looks forward to continuing to collaborate with DP&E, Wollondilly Shire Council and other stakeholders to finalise the plan for Wilton New Town. A small number of specific recommendations are contained in the attached submission for your consideration.

We are encouraged and excited about Government’s vision for the future of South West Sydney as a successful, identifiable and sustainable region of Sydney.

Yours sincerely

Trent Kelly
Project Director
Bradcorp Holdings
Response to the

Wilton Priority Growth Area
Interim Land Use and Infrastructure Implementation Plan

September 2017
1 Introduction

Bradcorp welcomes the release of the Wilton Priority Growth Area Interim Land Use and Infrastructure and Implementation Plan (the Interim LUIIP). The Interim LUIIP establishes a broad strategic framework that will enable the Wilton Priority Growth Area (Wilton PGA) to grow and evolve into a vibrant, self-contained community.

The Bradcorp project, identified as the North Wilton Precinct in the Interim LUIIP, is the largest landholding within the Wilton PGA with 518 hectares of developable land. The North Wilton Precinct offers a significant opportunity to deliver essential housing supply, employment opportunities and a new community (in excess of 5,400 dwellings) with supporting infrastructure.

The timely delivery of infrastructure is a critical element to the success of the Wilton new town and wider PGA. Bradcorp has been a proactive participant in the identification of critical infrastructure for the project and the commitment to deliver the infrastructure needed. Bradcorp is aware that the finalisation of the Interim LUIIP will require the resolution of traffic, transport and infrastructure matters.

An innovative and flexible planning approach is also an important element for the delivery of the Wilton New Town. The Interim LUIIP raises the prospect of a new flexible zoning regime that will allow Bradcorp to deliver its ‘Garden City’ vision for the Wilton North Precinct over the life of the project. To this end, Bradcorp are supportive of the DP&E’s approach and they are keen to work with Government to ensure that the final LUIIP provides a robust, yet flexible planning framework that will aid the efficient and timely delivery of homes, jobs and infrastructure over the life of the Wilton PGA.

This submission has been prepared on behalf of Bradcorp, who are supportive of the collaborative approach the DP&E has undertaken in driving the Wilton PGA and the preparation of the Interim LUIIP.

Bradcorp want to continue working constructively with all levels of Government to achieve a timely and effective outcome for the Wilton North Precinct, in order to deliver an economic, social and environmentally sustainable new town.

1.1 The Site

The Wilton North Precinct identified in the Interim LUIIP is an 873-hectare site owned by Bradcorp. It is the largest single land holding within the Wilton PGA and represents capacity to deliver a new community of over 5,400 new homes with access to employment opportunities, education and recreation and leisure activities.

The site is characterised by gently undulating terrain that is surrounded by native vegetation that runs the length of the Nepean River and Allens Creek boundaries. This ribbon of dense vegetation provides a unique opportunity to deliver a master planned development with strong connections to the bushland area. An elevated highpoint at the southern portion of the landholding provides excellent views over the site and Razorback Ridgelines to the north-west and north. The remaining land within the site is mostly cleared and has been used for grazing purposes for many years.

An existing bridge crossing over the Hume Highway is located in the southeast of the site that connects with Bingara Gorge including neighbourhood shops, Wilton Public School and the Bingara Gorge golf course.
1.2 Project Background


Since that time, additional investigations and intensive urban design of the Bradcorp land has been undertaken to develop the Wilton North Master Plan.

In January 2017, Bradcorp lodged the Wilton West Rezoning Proposal Submission to the DP&E. The Rezoning Proposal included a comprehensive plan for the establishment of a new community that, together with the capacity to deliver over 5,400 new homes would also provide:

- a lakeside ‘Activity Hub’ that contains cafes, health facilities, restaurants, ‘smart’ workplaces, shops, recreation and entertainment uses.
- an 11 hectare man-made waterbody which forms part of an integrated wastewater treatment cycle.
- new local job opportunities with a special focus towards the ‘knowledge & professional services’ and ‘health & education’ sectors.
- eight walkable neighbourhoods with a diverse range of housing types and living experiences suited to a variety of families and households.
- major State infrastructure to make Wilton New Town highly accessible to the regional road network.
- new schools and educational facilities to support local learning and employment.
- a green grid of local parks, active sports fields and boulevards that link to the surround native bushland
- 22 km of walking and cycle paths throughout the project.
- conservation of around 354 hectares of native bushland and waterways.
- bush trails and activities that connect people with nature.

The principles of the ‘Garden City’ movement are the main driving platform for the design and land use arrangement for the Wilton North Precinct, 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 integration of the land uses, and in turn the connection with the surrounding bushland forming a visual curtain around the site. This has created a connected and walkable community where residents will have access to a wide range of activities and opportunities.

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 the Wilton North Precinct a highly liveable, connected and a culturally rich place to live, work, learn and play.

One of the key features of Bradcorp’s proposal for the Wilton North Precinct is water and the formation of a new community around a large lake in the south of the site. The Lakeside Precinct 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 the proposed sewer treatment system. The lake will play a vital role in delivering an environmentally sustainable, connected and healthy community. The lake will ensure that heat island affects are mitigated and offer residents a place that can be enjoyed all year round.

Leisure, educational and business opportunities on and around the lake precinct will be connected through a series of walking/cycling tracks as well as an efficient road network, encouraging residents to utilise sustainable transport options to access the Lakeside Precinct.
Activating the ‘Activity Hub’ is a mixture of convenience shopping, entertainment, commercial, restaurants, cafés, education and recreation pursuits. The ‘Activity Hub’ is also in an ideal location for a Smart Work Hub, which will allow residents to work in alternative locations closer to home. The ‘Hub’ will offer residents with the opportunity for teleworking in a healthy and active alternate work space to their offices or homes.

Another key element of the Wilton North Precinct will be the provision of a significant road network into and within the Precinct. This includes the construction of a new south bound off-ramp from the Hume Highway to the existing Niloc Bridge, duplication of Niloc Bridge and a north bound on-ramp to the Hume Highway. 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 forming a backdrop.

The integration of the new off ramp, on-ramp, Niloc Bridge duplication and internal road network will allow residents direct access into and out of the Wilton North Precinct and provide road network where residents can safely avoid the freight movements associated with the Picton Road and Hume Highway Interchange.

Education and learning facilities are another key element to building a new community for the Wilton North Precinct. Bradcorp has committed to provide opportunities for the full range of education opportunities from early childhood learning to schooling and then up to higher level tertiary education. Bradcorp’s commitment to education is demonstrated through agreements with providers for new schools, including with the Sydney Anglican Schools Corporation to establish a new Kindergarten to Year 12 school as part of the early stages of development. The School, to be known as the “Wollondilly Anglican College – Lakeside Campus” will provide state-of-the-art learning facilities for its future students. The key benefit is the assurance that Wilton New Town will have education facilities for the families that live in the first homes.

A key principle that has guided the urban design of the Wilton North Precinct has been the creation of walkable neighbourhoods. With a network of pedestrian and cycling paths, residents will be able to conveniently access the wide range of land use activities across the site. This will include the ‘Great River Walk’, which will take advantage of the natural setting of the bushland area, the Nepean River and integrate with the wider pedestrian and cycling network.

The infrastructure provision, housing choice, employment opportunities, education facilities and leisure activities that will be available to Wilton North Precinct residents will make this precinct a highly functional, desirable and self-contained community to live.
2 Zoning and Land Use

2.1 Zoning

The Wilton new town will be delivered over a 20+ years. Over this period, there are likely to be changes in the housing market, community expectations and technological innovation that will lead to change in land use allocations and lot product delivery.

It is encouraging that the Interim LUIIP raises the prospect of introducing a new ‘urban zone’ into the State Environmental Planning Policy (Sydney Region Growth Centres) 2006 (the Growth Centres SEEP). The new zone’s focus has been identified in the Interim LUIIP Background Analysis report as follows:

“to facilitate faster delivery of homes, jobs and infrastructure giving investment certainty about the future land uses expected in the area. The urban zone would apply to an entire precinct and confer development rights.” (pg 54)

The proposed new zone would apply to an entire precinct and will grant development rights, with development and subdivision only permissible once detailed precinct planning has been undertaken. To ensure that momentum in the planning process is maintained, and homes and jobs are delivered more efficiently, the preparation of precinct plans should proceed in parallel with the application of new zoning framework.

Bradcorp is supportive of a new approach that would see the delivery of homes, jobs and infrastructure in a more efficient and timely manner than is currently experienced, as long as there is no delay in proceeding to rezoning and delivery of land. In considering the implementation of the new ‘urban zone’, the DP&E should place emphasis on providing a highly flexible zoning that permits a wide range of uses, with land use informed by detailed precinct planning that sit outside of planning instruments. Such an approach would enable the evolution of large scale projects, such as Wilton North, over long periods of time without the need to undertake costly and time-consuming amendments to planning instruments.

Although the operation and mechanics of the proposed new ‘urban zone’ are not yet clear, Bradcorp is prepared to work with the DP&E to understand the implications of the new zone, how it will be applied and administered.

2.2 Land Use

The Land Use Plan (refer to Figure 1) of the Interim LUIIP provides land uses and activities on the Wilton North Precinct that include:

- Urban Capable Land
- Rural Residential
- Employment Land Use for Investigation
- Primary Conservation
- New Local Centre

The land uses identified in the Wilton North Precinct are generally consistent with the Bradcorp Master Plan for the site, except for the ‘Rural Residential’ allocation to the north and the Bradcorp’s proposed lakeside ‘Activity Hub’. There is, however, an opportunity for the DP&E to refine the land use plan to provide a greater level of certainty and to ensure critical place making and infrastructure initiatives are delivered.

2.2.1 Developable Land

The mapping of the developable area shown on the Interim LUIIP Land Use Plan (refer to Figure 1) is derived from the specialist studies undertaken for the DP&E. 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 PGA, 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.
Bradcorp has further examined the developable area through additional investigations, with the extent of the bushland conservation area of the Wilton North Precinct being refined, which is broadly consistent with the Interim LUIIP Land Use Plan. Where there are areas of minor inconsistencies, there is an opportunity to utilise the detailed work that Bradcorp has undertaken to refine the final Land Use Plan of the LUIIP as illustrated in Figure 2. Bradcorp suggests that approach be adopted.

Figure 1: Interim LUIIP Land Use Plan
2.2.2 Proposed Centres

The Interim LUIIP Land Use Plan identifies a Major Centre and four proposed local centres within the Wilton PGA (refer to Figure 1), with one local centre within the northern portion of the Wilton North Precinct.

Bradcorp’s vision for the Wilton North Precinct is to deliver a self-contained, connected and sustainable community based on ‘Garden City’ principles, a key element of this vision is the Lakeside Precinct. Focussed on an 11-hectare lake, the Lakeside Precinct will play a multi-functional role providing a unique and highly desirable setting for the establishment of leisure and business activities and housing opportunities. The ‘Activity Hub’ within the Lakeside Precinct will offer a unique opportunity to leverage off the amenity that the lake will provide to establish a unique microclimate that facilitates new jobs in the new services economy within walking distance from new homes.

Many of the employment uses targeted will be situated within the ‘Activity Hub’ to utilise the amenity of the lake and the activities that want to be close to it. The ‘Activity Hub’ will form a diverse activity node incorporating services, education, retail, entertainment, recreational and community based activities during daytime and night-time hours.

Bradcorp has invested significant time and resources in developing a strategic plan that will enable the ‘Activity Hub’ to provide a source of employment and leisure opportunities. Bradcorp commissioned MacroPlan Dimasi to prepare the Wilton Lakeside Precinct: Employment Strategy and Economic Masterplan (the Employment Strategy). The Employment Strategy identified that the ‘Activity Hub’ will include:

- business incubator,
- training services and
- a broad range of health services
- local specialty shops
- restaurants, cafes and small bars

Many of these businesses will seek to connect with the water and provide a waterfront outlook for its customers, in particular restaurants, bars and cafes that can benefit on the aesthetics during the day and night. The ‘Activity Hub’ 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.

*Given the important role the ‘Lakeside Activity Hub’ is likely to play in providing a unique environment for employment generation, it is requested that the final Wilton LUIIP Land Use Plan/Structure Plan reflect the location of the ‘Activity Hub’ within the Wilton North Precinct as illustrated in Figure 2.*

2.2.3 Rural Residential

Rural Residential land uses will form an important part of delivering housing choice across the Wilton PGA. Bradcorp, in its Rezoning Proposal, has incorporated a mix of housing types to capture all segments of the market. However, Bradcorp is concerned that the DP&E has allocated a ‘Rural Residential’ land use to the northern most point of the Wilton North Precinct.

There is no explanation within the Interim LUIIP or any of the accompanying documentation that provides an indication of the DP&E’s decision to allocate this land use. Under Bradcorp’s Rezoning Proposal, this area has been identified for general residential uses with pockets of large lot residential along parts of the perimeter of the developable land area. Housing in these areas will be built to relevant bushfire planning standards, with the road layout designed to allow for easy egress to safe areas in the event of an evacuation.

Bradcorp is also proposing the introduction of ‘Special Urban Areas’ across the Wilton North Precinct that aim at integrating vegetation clusters, such as the windrows, into the urban design of site. A number of windrows in the northern part of the Precinct have been nominated for this initiative, potentially providing an opportunity to deliver a unique housing option where residents can live amongst the trees.
This area also includes a new local centre (also identified in the Interim LUIIP) that will encompass higher density residential development and the future K-6 public school and associated open space. Allocating ‘Rural Residential’ in this area will detrimentally impact the viability of a new local centre, consequently impacting the amenity and walkability of the area and the access to goods and services for residents in the north.

As such, the ‘Rural Residential’ allocation in the LUIIP is not appropriate and does not fulfil the vision for this area of the Bradcorp landholding and it is requested that the DP&E remove this land use allocation.

Figure 2: Proposed Wilton LUIIP Land Use Plan/Structure Plan
3 Mining Co-existence

The Interim LUIIP identifies lease areas for coal mining within the Wilton North Precinct, within the timeframe of 15-30 years, though extraction operations are not likely to commence for 25 years. As a result, restrictions to height of buildings and density have been applied to the Wilton North Precinct development. Bradcorp has been proactive and reached an agreement with South32 to remove the mining encumbrance. The Interim LUIIP acknowledges this and states:

“Landowners of the northern (Bradcorp) and town centre precincts (Governors Hill) have reached agreement with miner South32 that the mining lease over this area will be relinquished when the area is rezoned” (pg. 11)

The outcome of this agreement is that restrictions that were placed as a consequence of mining to building heights, floorplate sizes and density should no longer apply to development within the Wilton North Precinct.

Bradcorp will continue to work collaboratively with the DP&E, Department of Primary Industries and NSW Government to fulfil the requirements of the agreement.

4 Transport Infrastructure

4.1 Critical Road Infrastructure

Bradcorp, in its Rezoning Proposal has identified key road infrastructure items that are critical for not only the North Wilton Precinct, but also the wider Wilton PGA. This includes the following:

- Direct access off-ramp;
- Niloc Bridge duplication;
- North-bound Hume Highway entry on-ramp; and
- Main internal road through the Wilton North Precinct leading to Picton Road through the Town Centre Precinct.

The direct access off-ramp, duplication of Niloc Bridge and north-bound Hume Highway on-ramp will be delivered by Bradcorp upfront. Together with the internal road network the road infrastructure will enable the development of the Wilton North Precinct without undue pressure being placed on the surrounding road network. The infrastructure has also been designed to enable expansion as the Wilton PGA grows, enabling connections between precincts that will provide a local road network. Bradcorp has provided DP&E with the necessary information that demonstrates that the proposed road infrastructure is technically sound and can be delivered.

Bradcorp has undertaken additional investigations into the road infrastructure requirements needed to service the future community of Wilton North. A spine road system has been developed that has capacity to cater for current dwelling and population projections as well as possible changes over time. To this end, the road network proposed by Bradcorp for the Wilton North Precinct will meet the needs of the future community for the foreseeable future, with roads outside of the Wilton North Precinct to be delivered as the wider Wilton PGA grows. This should be reflected in the final LUIIP (refer to Figure 2).

While the Interim LUIIP provides a broad indication of the transport infrastructure requirements that will be needed to service the PGA, it is acknowledged that a much more detailed investigation is currently being finalised and will inform the final LUIIP Structure Plan. We appreciate that the DP&E is working collaboratively with the landowners to ensure that these road infrastructure requirements can be adequately funded and delivered.
Bradcorp has been proactively working with the DP&E, RMS, Council and other land owners to ensure that these, and other key pieces of road infrastructure are identified and appropriately funded. Bradcorp will continue to work collaboratively to ensure that the roads necessary for the delivery of the Wilton North vision are appropriately identified, as illustrated in the proposed Land Use Plan/Structure Plan (refer to Figure 2). Appropriate funding mechanisms need to be identified to ensure the timely delivery of infrastructure.

4.2 Northern Menangle Road Link

The Interim LUIIP Background Analysis report identifies a road link at the northern tip of the Wilton North Precinct over the Nepean River and linking to Menangle Road. Given the DP&E is yet to release its transport infrastructure analysis, there is no rationale provided for the function/role, purpose or location of the link road.

Delivery of such a connection would require overcoming significant physical constraints, including a 70m gorge across the Nepean River, crossing the main southern rail line and the removal of potential Endangered Ecological Communities. These constraints alone make the viability of providing such a connection extremely difficult.

*The road network as shown in Figure 2 has been designed to cater for the transport needs of the Wilton New Town and accordingly we believe the Northern Menangle link road is not required.*

To ensure a beneficial outcome for the future community of the Wilton North Precinct, Bradcorp will continue to work with the DP&E, RMS and Council on road infrastructure requirements.

5 Employment Opportunities

5.1 Employment Activities

The success of the Wilton PGA will be achieving localised employment opportunities. The Interim LUIIP ‘Land Use Plan’ identifies areas for employment mainly focussed around the Town Centre. It is acknowledged that a large portion of employment activity will be generated by the Wilton Town Centre. Bradcorp supports the principle of this approach.

In relation to the Wilton North Precinct, the Interim LUIIP Land Use Plan (refer to Figure 1) identifies employment land use for ‘further investigation’ at the southern edge of the site as well as the local centre to the north of the site. As detailed in Section 2.2.2 of this submission, an Employment Strategy has been developed that sets out a framework for establishing and nurturing a vibrant ‘Activity Hub’ employment precinct.

The ‘Activity Hub’ will provide a walkable neighbourhood that complements the Town Centre and will be a unique catalyst for delivering a range of employment activities that can be provided early in the establishment of the development. A strong driver of employment generation will be the delivery of residential development to support local service, health and education establishments and services that will create demand for professionals and higher order jobs.

*As noted above, and illustrated in Figure 2, this area, the Activity Hub, must be included in the final Land Use Plan/Structure Plan for the Wilton PGA. Its inclusion will enable Wilton North to play an important role in delivering a high level of employment opportunities that will help Wilton achieve its vision of being a self-contained new town.*

5.2 Employment Delivery Mechanisms

The Interim LUIIP has identified the establishment of an ‘Economic Development Board’, supported by a full-time economic development co-ordinator, that will focus on facilitating the identification and implementation of economic development opportunities. The concept of establishing an Economic Development Board was a Bradcorp response to a DP&E request for suggestions to promote broad economic growth at Wilton.
The Interim LUIIP proposes to tie employment provision to a subdivision threshold. This suggests that subdivision within each precinct and across the Priority Growth Area will only be approved when employment generation is assessed to be sustainably delivered in line with population growth. The LUIIP also notes that Council’s Development Control Plan would include controls to ensure that additional residential subdivision is approved after sufficient local jobs growth has occurred. This effectively places a cap on the delivery of housing, which has the potential to significantly impact housing supply, which is the primary economic driver of job creation. This lack of certainty will limit the ability to attract investment in employment generating activities, thereby negatively impacting on the delivery of a self-contained community.

The establishment of an ‘Economic Development Board’ to look at broad economic opportunities for the Wilton PGA is a pragmatic approach to employment generation and localised job delivery. The approach to employ an individual whose exclusive role is to secure employment industries to establish at Wilton and report to the Board, will be critical to successfully establish localised jobs needed in the Wilton PGA.

Bradcorp look forward to fully supporting Government initiatives to drive the much-needed economic prosperity of the Wilton PGA and fully recognise the importance of driving employment from the outset.

### 6 Biodiversity and Bio-certification

#### 6.1 Biodiversity

Bradcorp has undertaken extensive ecological site investigations of the Wilton North Precinct. These investigations have identified vegetated areas that contain Ecologically Endangered Communities (EEC). These EEC areas have now been included within the retained bushland around the perimeter of the Wilton North development area.

The bushland area has been identified for conservation in the Rezoning Proposal for the Wilton North Precinct. Across the Wilton North Precinct, this represents the conservation of 354 hectares of bushland that benefit the future community of the Wilton North Precinct, which has been determined in discussions with OEH. An additional east-west fauna link through the centre of the Precinct is also proposed.

The Land Use Plan of the Interim LUIIP identifies areas for ‘primary conservation’ (refer to Figure 1). The additional work Bradcorp has undertaken on the site has redefined the extent of the developable land and bushland conservation area of the Wilton North Precinct. Bradcorp’s updated bushland area is generally consistent with the Interim LUIIP Land Use Plan. While there are areas of minor inconsistencies, there is an opportunity to utilise the detailed work that Bradcorp has undertaken to refine the final Land Use Plan of the LUIIP as illustrated in Figure 2, therefore avoiding rework of boundaries that are already defined.

#### 6.2 Bio-certification

The Interim LUIIP Background Analysis outlines that bio-certification is to proceed concurrently with the rezoning process. Bradcorp supports this approach and to this end, the work undertaken by Bradcorp’s ecological consultant provides the DP&E with enough certainty to determine the conservation areas and finalise zoning.

Since the submission of the Rezoning Proposal, Bradcorp has undertaken further ecological investigations to support bio-certification of the Wilton North Precinct. Bradcorp are actively pursuing bio-certification for the Wilton North Precinct and to this end they have substantially commenced the bio-certification process with the DP&E, who have agreed to be the relevant planning authority. Bradcorp will continue to work with the DP&E and OEH to achieve a timely outcome on this matter.
7 Conclusion

On behalf of Bradcorp, we commend the DP&E for its release of the Wilton Interim Land Use and Infrastructure Implementation Plan and taking bold and positive steps that will see the expedited delivery of a new town at Wilton.

Bradcorp has been integrally involved in the Wilton Junction Master Plan process and have made significant investment into the master planning of Wilton North and the wider Wilton PGA 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 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 developable area identified as part of extensive site investigations
- The provision of a substantial lake with the opportunity to establish an ‘Activity Hub’ employment precinct adjacent to the lake
- Road infrastructure that will provide direct access to the residents of Wilton North
- Bushland conservation areas.

It is requested that the final Wilton LUIIP Structure Plan adopt the work undertaken for the Wilton West project by Bradcorp and represented in Figure 2, including:

- Identification of the major road network;
- Recognise the proposed ‘Lakeside Activity Hub’ as a legitimate leisure and employment area.
- Removal of the ‘rural residential’ notation on the northern portion of the Precinct; and
- Adopt the extent of the ‘bushland conservation area’ based on the extensive ecological investigations conducted by Bradcorp.

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, high-quality and best practice emerging town.