

20 September 2017

Ms Carolyn McNally  
Secretary  
NSW Department of Planning and Environment  
GPO Box 39,  
Sydney NSW 2001

Dear Ms McNally

### **Interim Land Use and Infrastructure Implementation Plan for Wilton**

Thank you for the opportunity to provide comments on the Interim Land Use and Infrastructure Implementation Plan (LUIP) for Wilton, which outlines a 20-30 year vision including the delivery of 15,000 new homes and a new town centre providing shops and services as well as employment opportunities for people living in the area. We welcome the Department's efficiency in placing these documents on exhibition and the level of resources (staff and funding) to help meet timeframes and ultimately assist delivery on the ground.

The Property Council supports the proposal to deliver circa 15,000 new dwellings in the Wilton Priority Growth Area to contribute towards the achievement of increased housing at key locations in the Sydney Metropolitan area.

The documents released by the Department are comprehensive and provide welcome foresight, pointing to future processes, such as the opportunity of zoning future development land as "urban" and the provision of a contributions framework via the Interim Land Use Plan. These mechanisms provide both greater flexibility and a suitable level of certainty in the delivery of new communities and we encourage the Department to replicate these in other precincts.

The Property Council urges caution with respect to the possible limit on residential development until new jobs are created. Employment growth tends to follow rather than lead residential development, especially in greenfield locations. While construction activity generates temporary employment opportunities, a growing residential base is a better foundation to support employment located in town centres. We encourage the Department to create the economic framework for employment growth to occur at Wilton, including satellite growth from Campbelltown, Liverpool, and the Western Sydney Airport.

We are also concerned that details outlining NSW Government development levies, namely Special Infrastructure Contributions (SICs), the Affordable Rental Housing Levy and Voluntary Planning Agreements (VPAs) are yet to be released. Industry is unable to provide comprehensive feedback in the absence of details about these levies. In addition, recent changes to local government Section 94 contributions, the removal of 'caps', casts further uncertainty over the feasibility of projects, with development costs largely being unknown.

We urge the Government to release details on proposed levies to enable industry to assess and comment on specific detail, and regarding section 94 developer contributions, we encourage the NSW Government to intercede where councils seek substantial increases.