

Date: 20 September 2017
File: 10400

NSW Department of Planning and Environment
Level 22, 320 Pitt Street
SYDNEY NSW 2000

Att: Bruce Coleman

Dear Bruce,

Exhibition of Draft Interim Land Use and Infrastructure Implementation Plan for Wilton.

I write on behalf of Governor's Hill regarding your invitation to comment on the Draft Interim Land Use and Infrastructure Implementation Plan (LUIIP) for the Wilton New Town.

Governor's Hill's comments are as follows:

Background

The Governor's Hill site will play a significant role in the provision of conveniently accessible, well connected employment generating land and housing supply in the Wilton New Town PGA as follows:

- I. 10.74 ha of mixed use land proposed to be zoned B3 or B4;
- II. 5.49 ha of highway services land proposed to be zoned B5;
- III. 26 ha of 'core' Strategic Centre land zoned B3 with height (70 metres) and FSR (6:1) controls providing for 1.56 million sqm of GFA (maximum theoretical build out); and
- IV. 7.18 ha of public education suitable for a k-12 school and other education / community facilities (subject to master planning), also with a B3 zoning and height (70 metres) and FSR (6:1) controls (maximum theoretical GFA of 430,000 sqm); and
- V. 1,500+ dwellings within the residential precincts surrounding the centre and potential additional within higher density residential and mixed use developments within the town centre in the long term.

The Governor's Hill land will also be at the focus of the district and regional road network by virtue of its position adjoining the Hume /Picton intersection, the presence of the town centre within its boundary and the presence of the Bradcorp residential to the north (which will connect to Picton Road via the Governor's Hill site).

Thus the Governor's Hill site has a strategically important role in the successful development of the Wilton New Town.



In recognition of this, Governor's Hill has prepared and submitted a proposal to rezone its land in accordance with the concept master plan below. The majority of the comments in this submission support this concept master plan.

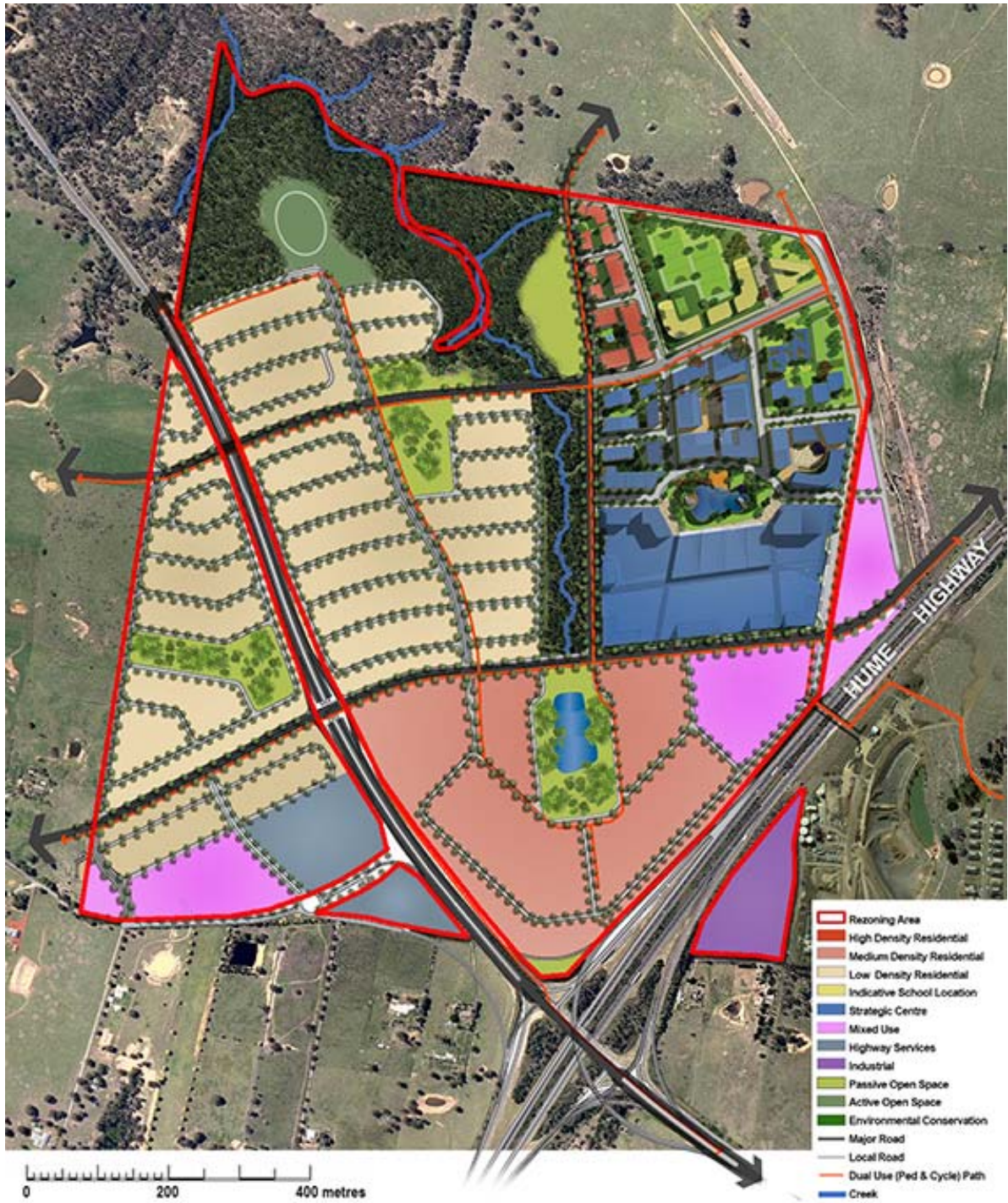


Figure 1: Governor's Hill Rezoning Concept Master Plan



We have reviewed the exhibition material and make the following comments for the Department's consideration.

At the outset, Governor's Hill supports the Department's intuitive in planning for Wilton New Town. The emphasis by Government on fast tracking land supply for housing and employment, coupled with an integrated infrastructure plan is applauded. It will contribute to addressing the housing affordability and land supply issues confronting Sydney and the linking of planning land use and infrastructure is refreshing and long overdue.

We also generally support the Government's vision, objectives and directions contained within the Interim Draft LUIP and we make only a limited number of requests for amendments to the LUIP. These are presented below.

1. Land for Housing

Governor's Hill supports the following objectives of the Plan:

1. Ultimately 20% of the housing to be smaller lot, semi-detached homes, townhouses and low rise apartments (pp.7 & 14); and
2. The removal of minimum lot sizes and encouragement of innovating housing solutions (pp.7 & 14).

We note that densities will consider infrastructure and local character (p.14).

Only new approaches to housing diversity, with an emphasis on higher densities will deliver increased housing supply at affordable price points.

In this regard we note that the draft LUIP differs from the concept master plan in Governor's Hill Rezoning Submission. In the precinct in the south of the site the LUIP suggests consideration of employment land or housing land subject to further investigation, while the Governor's Hill Concept Master Plan suggests medium density residential use (refer to figure 2 below).

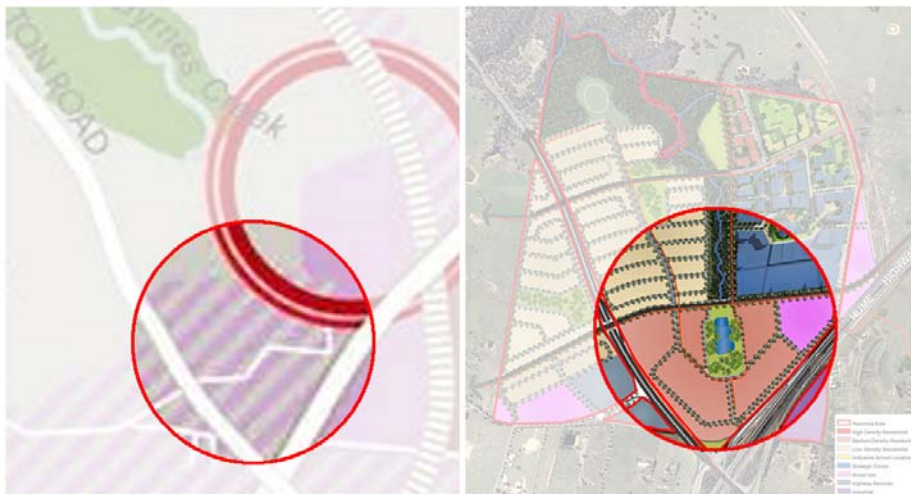


Figure 2: Difference between Draft LUIP and Governor's Hill Rezoning Concept Master Plan in southern Precinct of Site.



We request that the LUIP adopt the Concept Master Plan's proposal for medium density land use in this Precinct in lieu of employment land. This request is made on the following grounds that support the objectives of the LUIP:

- It is the most advantageous part of the site to provide superior access to community and employment services as well as transport infrastructure within the town centre. The precinct directly adjoins the town centre and will be within walking distance of the proposed location of the public transport interchange;
- The reduction in employment land supply would be negligible and, given the nature of the uses that would be attracted to the precinct (predominantly big box bulky goods uses), the density of employment (and number of jobs reduced) would be low;
- The precinct will enjoy good amenity with access to a large centrally located park, the design of which will take advantage of landform and hydrology to deliver an attractive lake themed public place over looked by housing;
- Medium density use (maximum height four storeys) presents a superior streetscape and built form outcome at this important gateway to both Wollondilly Shire and Wilton New Town; and
- Medium density use, by virtue of its smaller building footprints is better suited to the undulating landform in the precinct.

These latter points are significant. Put simply, medium density use in this precinct is, in our view, a better outcome for both the Shire and Wilton New Town. The corner will be *THE* gateway into the Shire for most people. It will be a fundamental component of character generation and Shire branding. Medium density residential use is better suited to the landform and the gateway nature of the corner to the Shire than large box employment uses or bulky goods.

Big boxes at this visually prominent corner will require excessive earthworks and retaining walls to accommodate the large floor plates. They will exhibit large expanses of roofs and blank walls to elevated, and other key, viewing points and it does not capitalise on the walkability and proximity of the precinct to the centre and public transport (bulky goods uses are without fail car oriented).

3. District Centre and Employment

Governor's Hill supports Government's intentions for the District Centre and its planning principles identified in Part 6.1 of the Plan and accompanying Urbis report "*Greater Macarthur and Wilton Retail Market Analysis Final*." We note that:

- the LUIP's goal that, to facilitate early and timely delivery, the centre will initially develop near the Picton Road / Hume Highway intersection (pp.34 & 35);
- the centre is reduced in scale and role compared to that presented in the previous exhibition in September 2015;
- the proposed village centres (x 3 excluding Bingara Gorge and described as 'Local Centres' in the draft LUIP) will be anchored by small scale supermarkets up to 2,500 sqm in size; and
- The Staging of the development of centres in the Urbis report identifies the District Centre to commence to provide retail floor space to serve the Wilton new Town in the first instance, followed by Bingara Gorge in 2036 and the additional small supermarkets in 2040 and 2046.



However, we note a somewhat potentially contradictory principle that rezoning proposals for commercial use outside the District Centre will need to be supported by a retail study that demonstrates that any retail, commercial or community uses will not impact the viability or intended role of the District Centre (p.35).

Governor's Hill is vitally concerned that the early commencement of the centre is not threatened by the development of any competing "out of centre" uses that would be most appropriately located within the town centre in the early stages of the development of the New Town.

Such an outcome directly contradicts the goals of the LUIIP to support the establishment of a vibrant community and employment heart focussed on an economically viable and attractive District Centre in the Wilton New Town.

We would object to any proposal for retail and other centre type development outside the District Centre in the early establishment of the centre. We therefore support the Staging Plan in the Urbis report.

The recommendations of the Department's previous consultants, SGS, in their "Greater Macarthur Investigation Area Economic and Employment Analysis, September 2015" are also pertinent. It notes in five (5) different locations the importance of the need to support the establishment of the Centre early in order to gain critical mass and attract an agglomeration of activity. This requires the avoidance of "out of centre" activity which may undermine the objectives for the Centre. Relevant extracts of the SGS advice are appended to this submission in **Appendix A**.

Notwithstanding the best intentions of the planning process, controls need to be strong and a commitment made to their enforcement to ensure that the early establishment and role of the centre is nurtured and protected.

Governor's Hill, in its rezoning submission, has requested that robust and defensible planning controls be introduced that control the timing and size of certain land uses (e.g. retail and business premises) until certain thresholds in the development of the Wilton New Town have been met. This is reproduced in **Appendix B** of this submission.

In this submission we repeat the request that the Draft Interim LUIIP adopt robust and defensible planning controls be introduced that control the timing and size of certain land uses (e.g. retail and business premises) until certain thresholds in the development of the Wilton New Town have been met.

We also request that the opportunity to promote "out of District Centre" retailing in the short to medium term be removed from the final LUIIP.



4. Other Comments

Finally, we make a number of additional minor comments that, in our view, correct inaccuracies in the exhibition material or present more detail.

Social Infrastructure

In Part 5.13 'Social Infrastructure' the Sydney Skydiving Centre is noted (Point 55). This business will relocate off the site when development commences. It should not be considered in the Draft Interim LUIP as contributing to the social infrastructure of the Wilton New Town.

Rural Residential Use in West Wilton

We note that the Draft Interim LUIP proposes a very large area of rural residential use west of Picton Road.

We request that the Draft LUIP be amended by designating the lands west of Picton Road and north of Wilton Park Road as urban capable land in lieu of rural residential land on the following grounds that support the objectives of the LUIP:

- With the significant investment required in infrastructure, particularly roads, public transport and community in close proximity to the rural residential precinct, we suggest that rural residential use in this part of the Wilton New Town does not represent the highest and best use for the land.
- The adoption of a rural residential density in such a large precinct squanders the opportunities this land offers to assist in the funding of infrastructure and capitalise on the provision of infrastructure and services that will be provided in the neighbouring District Centre; and
- The Draft interim LUIP's objective to protect environmental values and provide a transition to surrounding rural areas or bushland can equally be achieved by detailed site specific responses that do not require designation of such a large area of rural residential density to be achieved.

We welcome the opportunity to discuss this with you and if you have any queries please contact me.

Yours sincerely,

MACARTHUR DEVELOPMENTS PTY LTD

Stephen McMahon
General Manager



APPENDIX A:

Comment and Advice from SGS in its “Greater Macarthur Investigation Area Economic and Employment Analysis, September 2015”

Comment and Advice from SGS in its “Greater Macarthur Investigation Area Economic and Employment Analysis, September 2015” remain relevant. SGS notes:

On page 46:

“There is a tension between:

- a centres based approach to planning, which seeks to concentrate higher order employment related activity in particular to realise the strategic benefits of clustering and trip minimisation, with some restrictions on out-of-centre commercial and retail development, and
- a more laissez faire approach allowing new forms of enterprise and commercial development in non-centre locations, often taking advantage on lower land values, to encourage employment growth.

While the changing needs of industry need to be recognised, a centres based approach to planning is crucial to future sustainability and planning authorities need to ‘hold the line’ in relation to this approach. Planning needs to effectively balance competing pressures to achieve multiple objectives - for sustainability, social cohesion and economic development.

...

Reactive planning decisions – for example, in approving ‘out of centre’ development can bring short term investment gains but close off future opportunities for compelling agglomeration economies.”

On Page 49:

“It is important that early centre development should be directed to those centres higher in the hierarchy identified as town or strategic centres at Menangle Park, Gilead and Wilton Junction ensure they are able to gain momentum, achieve critical mass and reach maturity. Once employment development is established at these higher order centres, then lower order village centres should be allowed to occur.”

On Page 50:

“While the changing needs of industry need to be recognised, a centres based approach to planning is crucial to future sustainability and planning authorities need to ‘hold the line’ in relation to this approach.”

On Page .59

“One of the easiest ways to stimulate job growth in outer suburban areas is to implement large catalyst developments such as schools, hospitals and tertiary education facilities. Catalytic development can assist in establishing centres and attract other industries that collocate.”



APPENDIX B:

Governor's Hill Suggested Planning Controls to Protect the Early Establishment and Role of the new Wilton District Centre (reproduced from Rezoning Submission)

The Economic Viability of the Strategic Centre

The SGS Economics & Planning Economic Analysis, (*"Greater Macarthur Investigation Area Economic and Employment Analysis September 2015"*), prepared for the NSW Department of Planning and Environment, notes the need to ensure that the economic viability of the Strategic Centre is supported. It is important that early investment and development should be directed to the centre so it can establish a foothold in the market, gain momentum, achieve critical mass and can reach maturity. This environment creates positive clustering and the associated beneficial agglomeration economy effects.

Once employment development is established at the higher order centre, then lower order centres should be allowed to occur. Reactive planning decisions – for example, in approving 'out of centre' development that seek to circumvent the cost of investment in a new centre can bring short term investment gains but exclude future opportunities for compelling agglomeration economies in the Centre.

In light of these concerns the following new clause is proposed for the LEP that can support the economic viability of the Centre:

4.1D Maximum gross floor area for, and provision of, commercial premises and other non-residential uses at Wilton New Town

(1) The objectives of this clause are:

- (a) To support, maintain and reinforce the centre hierarchy in the Wilton New Town Priority Growth Area; and
- (b) To ensure that the scale and timing of commercial premises and other non-residential development at Wilton New Town on land within Zone B2 Local Centre, Zone B4 Mixed Use and Zone B5 Business Development at Wilton New Town do not conflict with the viability of establishing commercial premises and other non-residential development on land zoned B3 Commercial Core at Wilton New Town; and
- (c) To control the timing and size of the Gross Floor Area of retail premises development in Zone B2 Local Centre and B4 Mixed Use at Wilton New Town.

(2) This clause applies to the land zoned B2, B4 and B5 identified on the Map (*a map showing the boundaries of the Wilton New Town Priority Growth Area*)

(3) Despite any other provision of this plan development consent must not be granted for development on land to which this clause applies for the purpose of shops, business or office premises, entertainment facilities; function centres; tourist and visitor accommodation, registered clubs and health services facilities prior to the Registration by the Registrar-General of the 4,000th lot;

(4) In this clause "the 4,000th lot" means the 4,000th lot created for development for residential purposes within the Map pursuant to development consents granted for subdivision since the date that this clause was first inserted in the plan.

(5) Notwithstanding subclause (3) development consent may be granted for shops, business or office premises, entertainment facilities; function centres; tourist and visitor accommodation, registered clubs and health services facilities on land identified in the Map if the total amount of Gross Floor Area does not exceed 400m²;

(6) In this clause, the provisions of Clause 4.6 are excluded.