

17 August 2022

Gwenda Kullen Manager Metro West Planning & Land Use Strategy, Department of Planning and Environment 4 Parramatta Square, 12 Darcy St, Parramatta, NSW 2150

By email: gwenda.kullen@planning.nsw.gov.au

Cc: Adrian Hohenzollern – adrian.hohenzollern@planning.nsw.gov.au

Dear Gwenda,

## RE: SOUTH EAST WILTON STRUCTURE PLAN AMENDMENT

In response to ongoing discussions and correspondence between Risland and the Department of Planning and Environment (DPE) regarding South East Wilton Structure Plan, Risland hereby formally request the amendment to the gazetted Structure Plan to reflect the amendments proposed in the Neighbourhood Plan application submitted already to Wollondilly Shire Council.

## 1. Background

After submission of the Draft South East Wilton Neighbourhood No.1 (the Neighbourhood Plan) to Wollondilly Council in December 2021, Council undertook an assessment and provided a Request for Further Information (RFI), dated 7 April 2022. A key aspect of the RFI was Council's position on the consistency of the Neighbourhood Plan with the approved Structure Plan. In recent discussions between the DPE, Council and Risland, the consistency of the Neighbourhood Plan with the approved Structure Plan with the approved Structure Plan has been considered, including the urban design rationale as well as the planning pathway required to update the current approved Structure Plan to be consistent with the proposed Neighbourhood Plan. It should be noted that both Council and DPE recognise the rationale for the Neighbourhood Plan's departure from the Structure plan, particularly in relation to achieving improved urban design outcomes that better respond to the site's topography.

Additionally, at a meeting held on 20 June 2022, the DPE noted that an amendment to the Structure Plan would require exhibition. The DPE agreed that it was logical that the exhibition of the amended Structure Plan to be undertaken concurrently with the formal exhibition of the proposed Neighbourhood Plan. We note that the Neighbourhood Plan has been on preliminary exhibition in accordance with Council's policy on Neighbourhood Plans, with formal exhibition to be undertaken once the Neighbourhood Plan is reported to Council. While the exhibition of the Structure Plan must be undertaken by the DPE, it was agreed that both formal exhibitions would be undertaken at the same time, and include links and information between the two processes, facilitating context to the amendments being sought. To assist the DPE with the exhibition, Attachment 1 included the proposed Structure Plan. The digital data to assist in the preparation of an amended Structure Plan ready for exhibition is also provided.

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## 2. Proposed Amendments

Below is a description of the key amendments and land use areas that have been identified through the design process of the Neighbourhood Plan and that have filtered through into the proposed Structure Plan.

## **2.1.** Employment/Enterprise

A portion Enterprise Land is located within Stage 2, on the north-west corner of the Precinct, running eastorientation. The Neighbourhood Plan proposes the Enterprise Land in the same location, however in a northsouth orientation. The proposed orientation will assist with the interface of the collector road, particularly with the delivery of the Picton Road overpass and connection to the Town Centre Precinct.

More broadly, the Enterprise Land across the Precinct has been increased slightly, as follows:

- Proposed Structure Plan = 16.385ha.
- Approved Structure Plan = 16.0836a.

In this regard, the Structure Plan provides a slight increase in the area Enterprise Land, providing increased opportunity for employment generating activity.

## 2.2. Local Centre

The Local Centre and surrounds have undergone a more detailed design review. As part of this review, the north-south collector road in Stage 3 was realigned to provide a more direct path of travel, as well as an alignment that better responds to the topographical constraints in the area. This necessitated a reconfiguration of the Local Centre. Additionally, given the topographical characteristics of the site, a revised concept for the Local Centre was submitted with the Neighbourhood Plan to provide a more efficient outcome. This included the location of undercroft parking to deal with the topography in the area, as well as facilitate the concentration of uses on a single, level pad.

In relation to the land for Local Centre within the Structure Plan, the following is a comparison of areas:

- Proposed Structure Plan = 2.06ha.
- Approved Structure Plan = 2.9ha.

While the area between the approved Structure Plan and the proposed Structure Plan differs, the proposed concept introduced in the Neighbourhood Plan provides a far more efficient use of land, while ensuring all uses are concentrated in one location.

### 2.3. School

The orientation of the school site has been amended from the approved Structure Plan to reflect the proposed north south road alignment. As highlighted above, the road alignment has been considered in the context of the topographical attributes of the site, as well as desire to provide improved connectivity along the collector road through this area and into the future stage. Furthermore, the orientation ensures improved interface with the Local Centre, as well as the playing fields to the south.

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In relation to the land area for education purposes, the following is a comparison of areas:

- Proposed Structure Plan = 2ha.
- Approved Structure Plan = 1.9ha.

In this regard, the area for education purposes is generally consistent with the current Structure Plan, with its regular shape being maintained.

## 2.4. Active Open Space

The proposed configuration of the active open space is a result of further detailed design consideration in relation to the ability to grade the area appropriately to facilitate a flat playing surface. Under the approved Structure Plan, there is insufficient area to deal with the topography of the location, as well as provide sufficient land for netball/basketball courts. The proposed configuration ensures that appropriately graded playing fields can be delivered, with opportunities for multiple active sports.

In relation to the land area for Active Open Space within the Neighbourhood, the following is a comparison of areas:

- Proposed Structure Plan = 11.25ha.
- Approved Structure Plan = 9.3ha.

The outcome of these proposed amendments facilitates a better site-specific outcome that will ensure the proposed facilities on the site are appropriately sited.

### 2.5. Passive Open Space

The open space has been designed and located together with medium density development, particularly as part of the additional design exercise undertaken for the Neighbourhood Plan (specifically for Stages 2-3). The reshaping and relocation of the open space areas is a result of a number of factors, including road layout, topography and accessibility.

In relation to the land for Passive Open Space within the Structure Plan, the following is a comparison of areas:

- Proposed Structure Plan = 4.612ha.
- Approved Structure Plan = 3.769ha.

The increased provision of open space will ensure that these spaces can adequality cater to the incoming residential population, with direct and convenient accessibility to all the spaces being achieved.

### 2.6. Low Density Residential

The low-density residential land is proposed to generally remain in the same locations across the Precinct.

In relation to low density residential land area within the Structure Plan, the following is a comparison of areas:

- Proposed Structure Plan = 175.1732ha.
- Approved Structure Plan = 183.3039ha.

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There has been an overall reduction in low density residential land across the Neighbourhood. This is a result of a number of factors, including increased areas required for stormwater infrastructure and the increase in open space areas, as well as additional medium density land.

# 2.7. Medium Density Residential

In relation to medium density residential within the Neighbourhood, the following is a comparison of areas:

- Proposed Neighbourhood Plan = 12.85ha.
- Approved Structure Plan = 9.5ha.

The increased area of medium density land is primarily focussed on Stage 3 of the Precinct, as well as land within Stage 2. The rationale for the increased medium density area is to take advantage of the amenity the Neighbourhood Centre, Enterprise/Employment Land, School and Open Space will bring. By concentrating the medium density area in and around amenity, improved development outcomes can be achieved, particularly road patterns and lot layouts that take advantage of the site's solar aspect.

### 3. Summary

Overall, the relocation and reconfiguration of uses and the major road layout provides a far more efficient and logical arrangement that has incorporated best practice urban design. Accordingly, we request that DPE progress the amendment of the Structure Plan consistent with the Structure Plan at Attachment 1 and the data provided

If you have any questions, or require further information, please contact the undersigned.

Your sincerely,

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