

## Wilton

1. The property is located in the West Wilton prescient of the Wilton Growth Area (WGA, it is 10.09 hectares and is orientated in a North South direction. It is transected east to west in the middle by an intermittent Class One stream. To the north and west the property is bordered by a sealed 25 m wide road. To the south and the west on of the creekline the property is bordered with STTF regrowth.
2. The soil is a medium to course quartz sandstone with very minor shale and laminate lenses and supports a SSTF vegetation not favoured by koalas.
3. mapping 1:25000 topographical map shows the vegetation on the block as open grassland with scattered copses of shale sandstone transition forest (SSTF) canopy in a tx (low quality condition) of less than 10% canopy cover and with the sole exception of a 4000 sq m section of regrowth in front of the dam there is no secondary canopy. It will never be meet the objectives of an E2 Conservation zoning whilst ever existing use rights exist in law.
4. The current condition of the vegetation is very similar to how it presented in 2000 when the land was assessed for its association with the SSTF in the area (OEH 2000 Benson and Howell) and ground truthed as less than 10% canopy cover.
5. The property has been used for grazing for at 150 years and previous to 1975 was part of a dairy farm. It was subdivided into hobby farm lots in 1978 and used for grazing horses and cattle. Since 2015 there has been pasture improvement and land clearing compliant with Schedule 5A of the Local Land Services Act (NSW) 2013.
6. Approximately 80% of the property has >5 degrees of slope to the road in the north and both to the north and south of the creekline with little side slope evident.
7. There is a major bushfire threat to residential, commercial and fire fighting infrastructure on the property. Asset protection zones of between 80 to 100 m width have been established to protect key infrastructure.
8. To reach to the one hectare of urban capable land identified in the south of the property will require a 400 m long and 30 m wide access road and services corridor through proposed E2 land and the existing APZ. 1.2 hectares of proposed E2 land (lined with 800 plus metres of koala fence) will be legally cleared to gain access to 1.5 hectares of urban capable land in the south of the property.
9. The plot will also require a 90m wide APZ. The two APZ's overlap leaving less than one hectare of lightly timbered paddock of possible E2 which has no possible connectivity to other SSTF patches in the northwest pocket of the property which is bounded by road on 70% of its boundary.

10. The property's APZs cover 4.5 hectares identified as potential E2. The APZs have to be regularly maintained a landuse which is incompatible with an E2 zoning.
11. The construction of a road and services corridor to access the 1.2 hectare urban capable pocket to the south will require clearing an additional 1.5 hectares.
12. Finally the two kms of koala fencing required by the APZs and boundary fencing will consume another hectare to be cleared to build and maintain.
13. Planning NSW's plan for [REDACTED] comprises three hectares of urban capable land and seven hectares of APZs, road access, services corridors and clearing for 2.4 kms of koala fence. Great work and thanks for \$250k of fencing.
14. Planning NSW used low quality outdated google earth images heavily influenced by late afternoon canopy shadows to determine the foliage on the property. 50% of the 'tree canopy' shown on the google earth image is shadow.
15. Sophisticated vegetation assessment GIS tools exist that could have provided a much more accurate appreciation of the vegetation cover. These include the three monthly aerial photography of the property commissioned by the Department, as well as OEH's BioMap and SEED data sets but these sources are at odds with the pictorial maps contained in the 2017 Google Earth images and 2011/12 developer's Gateway submission to Planning NSW and not worth the consideration.
16. The failure to ground truth only compounded the errors made by using second rate satellite images.
17. Ground truthing would have shown that the property looks nothing like the outdated image being used. Much pasture improvement, removal of dead and diseased trees, creation of laneways, boundary fence lines clearing, permanent internal fencing, water points established, a fire fighting pump installed, creek line modification to improve habitat, asset protection zone creation has been completed since 2017. It would also have found the 5000 sq m dam in the creekline, both features that are rated urban capable on the two adjacent properties to the east.
18. A prescient lack of faith in the CPCP 2020 project management led us to commission a site specific BAM, conducted in 2018 over a nine month period. The findings of the BAM are known to Planning NSW, however the Department decided to apply a sub standard generic vegetation study of less than 1500 sq m in total on five unrepresentative sites and apply it to 700 hectares including my 10.09 hectares to determine that 75% of the property is to be forcibly rezoned E2.
19. The CPCP 2020 is a victim of mission creep and poor project management, much could have been achieved but it fails everyone except its developer authors.