

15 December 2022

Mr Michael Cassel  
Secretary  
Department of Planning and Environment  
Locked Bag 5022  
Parramatta NSW 2124

Dear Mr Cassel,

### **GPEC Investigation Area Draft Strategic Framework: Western Sydney University Penrith Campus**

██ welcome the opportunity to make a submission on the GPEC Investigation Area Draft Strategic Framework (the **GPEC Framework**). The GPEC Framework will enable the area to capitalise on both existing and planned infrastructure in Western Sydney and the benefits that the new Aerotropolis will bring to the broader region.

The vision and the actions of the GPEC Framework are supported and consistent with the vision and framework that ██ share for the rezoning of the ██ and master planning for the ██. Together ██ are striving to deliver an integrated place outcome that redefines opportunities to live, learn, grow and age sustainably.

Whilst we support the GPEC Framework vision and guiding principles, there are opportunities for improvement in finalising the GPEC Framework. These opportunities are summarised below and discussed in more detail in this submission:

#### **1. Identification of the Kingswood and Werrington Precinct as a 'Priority Urban Renewal Area'.**

The Kingswood and Werrington Precinct is located centrally within the GPEC Investigation Area, along the east-west economic corridor. The Precinct is bookended by two existing train stations and contains the 'The Quarter'. Defined by the Greater Cities Commission as a Health and Education 'Precinct' in the maturity pathway model, the Quarter is one of the largest health, education, research, training and living precincts in Australia. This scale, supported already by significant government investment, is complemented by large landholdings that can deliver on the GPEC vision in the short term, for inclusive and diverse communities with jobs close to home, diverse housing, access to critical services and integration of natural assets. Identifying the Kingswood and Werrington Precinct as a Priority Urban Renewal Area will support its capacity as a significant driver for growth in the short term; reflect a commitment to enhancing connectivity to key public transport nodes and enable delivery of an exemplar urban renewal area in integrated health, education, innovation and sustainable community living.

Priority should be given to the Kingswood and Werrington Precinct as:

- It is serviced by two existing train stations where density can be located in the short term to support the growth of jobs within the Precinct and The Quarter. A significant proportion of the Precinct is located within 1500m of a train station and accessibility could be further improved

with the east-west links which are proposed under the GPEC Framework. This is opposed to the Orchard Hills Precinct where one metro station is proposed and the majority of the precinct will be located more than 1500m away from the metro station as demonstrated in Figure 21 of the GPEC Framework.

- There is already a diverse range of employment that is accessible within the Quarter and several stakeholders, including [REDACTED], have plans to build and capitalise on this foundation. There is a significant amount of investment occurring within The Quarter by both the Government and the private sector. Further strategic planning is required to capitalise on this investment and to progress The Quarter to an innovation precinct as envisaged under the Metropolitan and Regional plans.
- Land within the Kingswood and Werrington Precinct can deliver on DPE's objective for responsive growth and diverse and sustainable housing in an area well serviced by existing infrastructure, close to employment and education opportunities and with high amenity.
- There are significant landholdings which can deliver jobs and housing relatively quickly, as opposed to other growth areas identified within the GPEC framework which are highly fragmented and will take many years to unlock for development. The [REDACTED] [REDACTED] alone is a 100ha site in single ownership which could deliver upwards of 1,500 new dwellings, lifestyle and recreation facilities, and new social infrastructure, education and employment opportunities.

Recognising that the Kingswood and Werrington Precinct is large in area, there is the opportunity to stage development within the broader precinct similar to that which is proposed at Orchard Hills in the 'Discussion paper on planning for the future of Orchard Hills' (November 2022). A critical first stage should be a focus on The Quarter. Major infrastructure project in both health and education are progressing and several stakeholders have already commenced master planning for delivery of future investment, including housing within that area.

If DPE is still not of a mind to expedite the broader Kingswood and Werrington Precinct, then as a minimum The Quarter should be elevated to a Priority Urban Renewal Area within document given current and planned investment, the ability to deliver jobs, education and housing in the short term and its position within the east-west economic corridor which can be supported by existing infrastructure and transport. There is opportunity to include a staging plan of The Quarter to identify the focus areas for investment to drive economic and social prosperity calling out which areas will focus on jobs delivery, new and diverse housing, social infrastructure, education facilities, recreation and activity zones.

2. **Emphasise and increase the focus on the role of education within The Quarter Health and Education Precinct.** The framework, as drafted, recognises the significant Nepean Hospital upgrade and highlights a place-based approach to integrating health services through The Quarter. The framework should elevate the role of education and research when referring to The Quarter, including WSU and TAFE Kingswood and [REDACTED] respective investments and partnerships in education and research with Nepean/Blue Mountains Local Health District (LHD) and the Private Health Network (PHN). Together, the health and education providers in The Quarter generate significant investment and opportunities in employment, collaboration and innovation within the Precinct.

The actions in the GPEC Framework could be strengthened to ensure there is clear definition of the economic, social and environmental outcomes that tertiary education institutions can support and facilitate, and the next steps in planning and delivery to realise these outcomes. Action 4.3.15 under Direction 4.3 should be amended to include to expansion of education and research facilities in partnership with industry and The Quarter stakeholders [REDACTED]. This reflects the investment opportunities that those campuses could generate and the social infrastructure investment this could bring to the Investigation Area.

We also request the addition of a 'Potential [REDACTED] upgrade' with an indicative timeframe of short term for the Kingswood and Werrington Precinct under the Education category of the GPEC Framework's regional and district social and open space infrastructure list (Table 4, page 61). [REDACTED] to deliver a strong STEAM (Science, Technology, Engineering, Arts & Mathematics) education and research presence. This approach is consistent with Penrith City Council's objectives for industry, innovation and employment attraction in advanced manufacturing, new technologies and creative arts.

### **3. Better definition of the role and function of The Quarter, recognising the changing strategic drivers of land use and development activity within and surrounding The Quarter.**

The GPEC Framework acknowledges that government decisions on key structural elements of GPEC and the Western Parkland City are now locked in. However, it does not unpack and reframe the implications of these decisions for integrated land use and transport planning. For some time now there has been a strong strategic focus on the generation of jobs within The Quarter and the broader GPEC Investigation Area. However, this policy focus has been somewhat unsuccessful to date as there has not been a similar focus on improving transport connections east west and nor has there been a focus on developing a truly integrated 15-minute neighbourhood where jobs are supported by retail and diverse housing.

Without transformational commitments to transport infrastructure and the provision of more affordable and diverse housing, The Quarter will be progressively less competitive in attracting the investment required to meet employment and economic development targets based on current planning frameworks. This will only be compounded by the generation of other significant new employment opportunities in the Aerotropolis, Penrith CBD and at St Marys. The GPEC Framework is an opportunity to provide direction to plan for this changed context.

As noted above, [REDACTED] has a strategy to concentrate teaching and research, along with potential industry partnerships, on the [REDACTED]. This will facilitate a concentration and critical mass of people, and the proximity to facilitate a successful innovation ecosystem on the [REDACTED]. This strategy presents the opportunity for the [REDACTED] to deliver on other broader strategic commitments within the Metropolitan and District Plans in respect of housing, social infrastructure lifestyle and recreation facilities which are a key focus of the current State Government.

The Western City District Plan at page 47 outlines that there is 'a need to plan to support housing affordability and diversity measures by way of more compact housing, either on smaller land lots or through a proportion of smaller apartments of innovative design to support moderate-income households and particularly key workers and skilled workers in targeted employment areas such as health and education precincts'. The GPEC Framework is an opportunity to identify how this can be

achieved within The Quarter, making it a true 15-minute neighbourhood with all the key ingredients for a successful place.

Specifically, the [REDACTED] provides an opportunity to provide diverse and affordable housing that will support jobs growth within The Quarter. The current project vision is for the site to be “Western Sydney’s destination for discovery: A 15-minute future focused neighbourhood to learn, work, play and stay”. Werrington presents a unique opportunity to amplify the social and economic prosperity of The Quarter. The site will connect people to the existing places and spaces of WSU’s Kingswood campus and the Nepean – Kingswood TAFE NSW campus. It will offer new ‘whole of life’ education facilities and an innovative ‘Living Lab’ model in a thriving, mixed use precinct that will be designed to be liveable, sustainable, productive.



## LEARN

Lifelong learning with impact

A precinct where continuous learning and skills development is accessible for all.

Opportunities to collaboratively develop solutions to local challenges with global impact. Providing a pipeline of skilled workers to support emerging industries and the local strategic centres of the Health and Education Precinct Penrith, St Mary’s and Penrith CBD.



## WORK

Enabling partnerships

Through collaborative industry partnerships and connections with the regions emerging innovation and entrepreneurial ecosystem, the community will have opportunities to access future knowledge jobs close to home.



## PLAY

An innovative precinct

Opportunities for educational institutions, industry, and community to co-create and partner in a place where people connect in new ways.

Co-locating activities and social infrastructure in a mixed-use precinct, efficiently using land and embracing the natural environment to enhance the viability of, and access to, great places, spaces and public transport through active



## STAY

Highly liveable space

Providing high-quality and sustainable residential housing that spans the housing spectrum, from social housing to home ownership.

Attracting and connecting a diverse mix of current and future “locals” including Australia’s brightest minds and key workers to share culture, knowledge and ideas in a world-class precinct.

Figure 1 - The four focus pillars that will influence the future planning of the WSU Werrington Campus

While the redevelopment of the WSU Werrington campuses and potential upgrade to the Kingswood campus will invest in improvements to active transport connections within The Quarter. Public transport connections are a more regional issue and require a whole of government response. In order to address public transport connectivity, a specific project relating to new east-west connections between the Penrith CBD and St Marys via The Quarter should be made a short-term priority in Table 6, consistent with the action identified at 4.1.2 of the GPEC Framework.

Finally, to support The Quarter planning, the correct boundary should be defined in the structure plan and all subsequent diagrams in the document. It is generally understood to extend from the Nepean Hospital through to the eastern boundary of the WSU Werrington Campus as depicted in the Greater Penrith Place Strategy.

4. **Simplify and condense the actions.** It is evident that significant work has been undertaken by DPE in preparing the GPEC Framework and it will play a significant role in shaping the Investigation Area in a positive manner. However, the document contains a large number of actions which we believe could be simplified, consolidated or removed to make this GPEC framework easier to navigate and implement.

Further to the above, many of the actions have multiple leads assigned in various combinations such as Council, DPE, TfNSW and proponents. There is a risk that delivery of priority actions will be

impacted if there is no clear lead or if each agency's internal priorities conflict with the GPEC deliverable. We recommend that there be a greater level of clarity on ownership and accountability to ensure it is clear who is responsible for delivering on each action. Where short term outcomes can be delivered, there should be flexibility to ensure that short term opportunities to deliver growth in line with the objectives of the plan are not hindered because actions that are to be delivered by others are delayed.

5. **Specific Comments.** The table below makes comment to specific priorities and actions within the document. We would welcome the opportunity to discuss these further with DPE. In particular some of the Directions which relate to densities and tree canopy targets where we have not had sufficient time to ground truth these to see what impact the proposed provisions will have on development outcomes on the ground and if these are feasible.

Reference	Topic	Comment
Table 1, p26	Focus Precincts	<ol style="list-style-type: none"> <li>1. Identify the Kingswood and Werrington Precinct as a Priority Urban Renewal Precinct to capitalise on the existing infrastructure and current and future planned investment within that Precinct. Planning of the Kingswood Werrington Precinct will allow short term gains to be made and for the precinct to act as a catalyst for other development within the GPEC corridor.</li> <li>2. Amend The Quarter Penrith Health and Education Precinct area to match the GCC Greater Penrith Place Strategy within the GPEC Structure Plan (orange shading).</li> <li>3. Refer to [REDACTED] specifically in the 'Other Planned Developments' section on page 27 as a mixed-use development to progress as a priority within The Quarter to support jobs, housing and investment in that precinct.</li> </ol>
Figure 13, page 32	Priority areas for growth	<ol style="list-style-type: none"> <li>4. Identify the Kingswood and Werrington Precinct as a Priority Urban Renewal Area for delivery of jobs, education and housing. There is significant investment being made by the State Government and education providers in the precinct and this should be capitalised on, and supported by, new development.</li> </ol>
Direction 2.1, page 33	Focus strategic planning efforts on Orchard Hills and St Marys	<ol style="list-style-type: none"> <li>5. Add the Kingswood and Werrington Precinct as an area to focus strategic planning efforts. As noted above, the new Metro line is not the only government investment in the GPEC investigation area. Significant investment has been made at the Nepean Hospital and TAFE Kingswood campus. WSU also has plans to invest in its Kingswood Campus. There are two existing train stations which can accommodate more density. Strategic planning efforts should be focused on this area to ensure that this existing and future investment is capitalised on.</li> </ol>
Direction 2.2, page 33	Ensure GPEC contributes to	<ol style="list-style-type: none"> <li>6. In line with action 4.3.15, include reference to the need to provide affordable and diverse housing opportunities in The Quarter Precinct to support investment and job growth. The significant opportunity for short term</li> </ol>



	Western Sydney Housing Supply	housing on the WSU Werrington campus to drive further economic and social prosperity should be supported in an action of this kind.
Direction 2.4, page 35	Growth considers cultural, social and economic needs	<p>7. Include the Kingswood and Werrington Precinct in Action 2.4.1.</p> <p>8. Alternatively, if Kingswood &amp; Werrington is not identified as a priority, include a new action to provide appropriate housing diversity and choice within The Quarter suitable to attract knowledge intensive employees to the Precinct.</p>
Direction 2.6, page 36	Gross Residential Densities	<p>9. [REDACTED] welcome industry engagement on the proposed density provisions in early 2023. This would enable development of workshopped examples to ensure that the proposed densities are appropriate for the location and feasible to deliver noting other priorities and objectives within this and other policies / plans.</p>
Figure 14 & 15, pages 37 & 38	Employment Map	<p>10. Amend the boundary of The Quarter Health and Education Precinct to be consistent with other strategic documents.</p>
Direction 4.3, page 47	Ensure social infrastructure serves and reflects community culture	<p>11. Amend action 4.3.15 to include to expansion of education and research facilities in partnership with industry and Quarter stakeholders on the WSU Kingswood and TAFE Kingswood campuses.</p>
Direction 5.2, page 51	Make public open space accessible and useable for all GPEC residents	<p>12. Similar to the comment on the proposed residential densities. [REDACTED] would welcome the opportunity for industry engagement on the proposed open space ratios to ensure that the proposed densities are appropriate for the location and feasible to deliver noting other priorities and objectives within this and other policies / plans.</p> <p>13. There is no definition of net developable land, this should be defined within the document.</p>
Table 3, page 57	Tree Canopy cover targets	<p>14. The tree canopy targets and controls contained in the GPEC framework are quite specific and would be better placed in a development control plan or other lower order planning instrument as opposed to this higher order strategic framework.</p> <p>15. We support and advocate for increased tree canopies. The design criteria is well conceived however, the benchmarks may be prohibitive and/or unrealistic. In a typical new residential community approximately 20% of the street reserve is available for deep soil planting (nature strip). Achieving 70% is unrealistic given the constraints of lot widths, driveways, sight lines/setbacks suitable street tree selection, infrastructure, footpath and road maintenance requirements. It is suggested a more achievable target would be 50%, depending on location. This is supported by the UTS ISF 'Benchmarking Australia's Urban Tree Canopy, an i-Tree Assessment', 2014 study which identified that very few established Sydney suburbs achieved above 50% overall canopy</p>

		<p>and those that did have traditional suburban lot sizes with relatively large garden components.</p> <p>16. Similar to the comment on the proposed residential densities, [REDACTED] would welcome the opportunity for industry engagement on the proposed tree canopy targets to ensure that the proposed densities are appropriate and feasible to deliver noting other priorities and objectives within this and other policies / plans.</p>
Table 4, page 61	Draft regional and district social and open space infrastructure list	17. Add [REDACTED] upgrade' with an indicative timeframe of short term for the Kingswood and Werrington Precinct under the Education category
Figure 25, page 72	Draft Strategic transport infrastructure	18. Insert an east-west connection as a strategic transport infrastructure item on the infrastructure map. Additional east-west links are crucial if The Quarter Health and Education Precinct is to grow and become an innovation precinct.
Table 6, page 73	Draft Strategic transport infrastructure list	19. Table should refer to provision of east west public transport connections from Penrith CBD to St Marys to improve accessibility to jobs and education and support the growth of The Quarter to an innovation district.
Next Steps, pages 75-76	Precinct Planning	20. Add Kingswood and Werrington Precinct as a priority area for precinct planning. If DPE is not supportive of prioritising the whole precinct, elevate The Quarter Health and Education Precinct as a minimum

[REDACTED] would like to thank DPE for the opportunity to comment on the Draft Strategic Framework for the GPEC Investigation Area. We would welcome the opportunity to be more involved as the review progresses and in the future strategic planning for The Quarter and the broader GPEC Investigation area. In particular, we welcome the opportunity to participate further in workshopping the actions that relate to residential densities, open space and tree canopy coverage targets to ensure that these are appropriate for the location and housing typologies proposed and that the desired outcomes are achievable in practice. We would caution including such specific numerical targets as currently proposed without first testing what the implications would be on the development outcomes achieved within the investigation area.

Both [REDACTED] are excited about the opportunities the [REDACTED] present and the ability to deliver on many of the planning priorities outlined in the Draft GPEC Strategic Framework.

Should you wish to discuss the content of this submission further, please contact [REDACTED], [REDACTED], on [REDACTED] or by email at [REDACTED]

Re [REDACTED]