

GPEC Strategic Framework Team
Department of Planning and Environment
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Our ref: SUB22/265009

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Draft Greater Penrith to Eastern Creek Strategic Framework

This letter makes a submission to the public exhibition of the draft Greater Penrith to Eastern Creek (GPEC) Investigation Area Strategic Framework (draft framework).

NSW LAHC commends the Department for preparing the draft framework to guide future growth and renewal in the GPEC investigation area. We understand the draft strategic framework will establish a vision for growth, with supporting planning priorities and actions to guide future change and infrastructure delivery.

LAHC supports a strategic approach to planning and with significant landholdings across the GPEC investigation area, welcomes the opportunity to work with the Department and Penrith and Blacktown councils to ensure housing growth is diverse and supports increased housing choice - including more and better social housing.

1. Future renewal and precinct planning

The framework identifies six precincts for growth in areas close to major transport infrastructure and identifies St Marys Town Centre and Orchard Hill as priority precincts.

Penrith Centre, Kingswood and Werrington and Mount Druitt and Rooty Hill are identified as short-term renewal areas, while longer term change is proposed for Luxford to align with future transport infrastructure provision.

NSW LAHC has significant landholdings in St Mary's and across the GPEC and supports the opportunity for renewal and growth in areas close to transport and services. The draft framework recognises that Sydney Metro - Western Sydney Airport will be a catalyst for growth and unlock opportunities for new housing and urban renewal – with more than half of the new population living around stations in St Marys and Orchard Hills.

NSW LAHC supports the identification of St Marys as a priority precinct and the potential to renew existing social housing and deliver increased social housing in the town centre. We look forward to working with the Department and Penrith Council to renew and increase housing in the St Marys town centre.

2. St Marys Town Centre

The draft framework outlines that Penrith City Council will lead planning for the priority urban renewal area of St Marys, noting that Penrith City Council has developed a draft Structure Plan for St Marys Town Centre to manage growth and change over the next 20 years.

NSW LAHC has significant sites in the St Marys town centre and supports the opportunity for greater renewal and growth in areas subject to substantial investment in infrastructure over the next 20 years. NSW LAHC provided a submission to Penrith City Council in response to the exhibition of the draft Structure Plan. The submission (Attachment A) outlines support for renewal in the St Marys town centre, but considers there to be greater opportunity for increased density and renewal of social housing in areas close to St Marys station.

The matters raised in NSW LAHC's submission to the draft Structure Plan are a relevant consideration to the draft framework and the submission is attached for further consideration.

The draft Structure Plan identifies limited renewal or change to existing planning controls for most of the town centre, including LAHC owned sites within 400m of the station. This restricts the potential to increase housing within walking distance to public transport and local services and deliver on the priorities outlined in the draft framework. This is a missed opportunity and does not align with the vision and priorities set out in the draft framework which aims to increase housing in areas close transport infrastructure and jobs.

The draft framework includes an action (Action 2.1.5) to *ensure planning proposals in St Marys Town Centre demonstrate alignment with the St Marys Town Centre Structure Plan*. The draft Structure Plan identifies limited opportunities for growth or land use change, meaning that it will be difficult for any future planning proposals, within walking distance of the station, to demonstrate alignment with the draft Structure Plan.

The identification of growth and renewal opportunities on land within 800m of the St Marys station is critical to deliver more housing – this should be a clear action and outcome of planning for St Marys in the draft framework and Council's draft Structure Plan.

NSW LAHC also considers that Action 2.1.5 is inconsistent with other actions in the draft framework which all aim to increase density in centres and maximise renewal opportunities, including:

- *Action 2.4.1 Identify targets for culturally responsive and diverse housing in Orchard Hills and St Marys that establishes a precedent for precinct-scale renewal in other parts of Penrith*
- *Action 2.4.6 LAHC to work with DPE, Penrith City Council and the community to progress renewal of social housing in St Marys (Glossop Street Precinct), establishing desired future character and principles for retention of social housing*
- *Action 2.4.7 Investigate renewal opportunities for Luxford Precinct and explore opportunities to renew social housing aligned with NSW Government investigations into extending Sydney Metro – Western Sydney Airport from St Marys to Tallawong*
- *Action 2.5.4 Maximise the benefits of future transport infrastructure, including by planning for higher growth in and around Sydney Metro stations.*

3. Supporting social housing in the GPEC investigation area

NSW LAHC supports the opportunity to renew existing social housing assets and deliver more and better social housing across the GPEC investigation area. The provision of social housing is a critical social need and must a key focus of the priorities and actions in the draft framework.

NSW LAHC requests that the draft framework include greater focus on the importance of for social housing, opportunities for social housing renewal in areas close to jobs and transport, and recognition of social housing as important social infrastructure.

The draft framework is an opportunity to guide growth and land use change and should focus on the significant opportunities to deliver social housing across the investigation area. The draft framework notes that compared to Greater Sydney, there is a higher proportion of people renting community or social housing. The opportunity to deliver increased social housing is more important than ever.

NSW LAHC requests that the directions and actions in the draft framework are reviewed to ensure adequate consideration is provided to the opportunity for renewal and role of social housing as essential community infrastructure.

Suggested updates are included below which aim to provide greater recognition of the need for social housing and the opportunity to renew social housing to deliver improved social outcomes across the GPEC investigation area. The proposed updates are shown in red.

Priority 2 – Focused and responsive growth

Direction 2.1: Focus strategic planning efforts on Orchard Hills and St Marys

2.1.4 Continue working with the community and state agencies on the strategic planning for St Marys, including a clear vision, comprehensive plan for the public domain, integration with the new Metro station, multi-modal connections within the centre and to surrounding areas, social infrastructure, open space and capacity for growth *and urban renewal within 400m of the station*, consistent with its strategic centre role

Direction 2.2: Ensure GPEC contributes to Western Sydney's supply of Housing

2.2.3 Work with Penrith and Blacktown councils and state agencies to ensure short- and long-term growth in urban renewal areas such as Kingswood and Werrington, Penrith Centre and Luxford facilitates housing diversity, *renewal of social housing* and adequate provision of infrastructure

Direction 2.4: Growth considers cultural, social and economic needs

2.4.4 Continue to collaborate on opportunities for affordable housing in renewal areas

2.4.9 Ensure planning proposals and precinct planning in GPEC:

- prioritise walking, cycling, micromobility and last-mile freight within 15 minutes of important local destinations
- provide opportunities to connect with, design for and care for Country as per Direction 1.1
- investigate the provision of *social and* affordable housing and delivery mechanisms where land use change is proposed
- demonstrate the potential to achieve housing diversity and culturally responsive housing

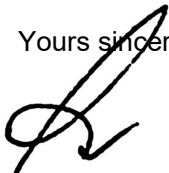
- consider economic and employment outcomes and industry strategies for the Western Parkland City, such as the draft Western Parkland City Economic Development Roadmap
- demonstrate the proposal will be supported by social infrastructure.

Direction 2.6: Enable vibrant places and neighbourhoods

2.6.1 Provide a mix of housing types and tenures, *including social and affordable housing*, that reflect the needs of communities and promote affordability for families or older people who want to stay in their local area

Thank you for the opportunity to make a submission, and we look forward to continuing to work with the Department to support diverse and resilient communities in Western Sydney.

Yours sincerely

A handwritten signature in black ink, appearing to be 'R. Stark', written over the words 'Yours sincerely'.

Robert Stark

A/Head of Policy and Innovation

NSW Land and Housing Corporation