

Penrith City Council Submission – Draft Greater Penrith to Eastern Creek Strategic Framework

February 2023

Thank you for the opportunity to review and provide comments on the Draft Greater Penrith to Eastern Creek (GPEC) Strategic Framework. Council broadly supports the intent and approach being taken in planning for GPEC including the vision statement and six planning priorities. On balance, the exhibited documents present a sound understanding of the area and future growth potential. Notwithstanding, there are a few areas where further amendment and/or clarification is warranted prior to finalisation.

This submission provides Council's comments and feedback on the Draft GPEC Strategic Framework as publicly exhibited in December 2022. The submission includes the following:

1. General comments
2. Comments by Chapter, including specific Directions and Actions
3. Comments on supporting documentation (ie. GPEC Social Infrastructure Needs Assessment)

We would be happy to discuss these comments with you in further detail as required.

It is recommended that this submission be read in conjunction with Council's submission on the Orchard Hills Precinct Discussion Paper given the interrelationship between the two documents.

1. GENERAL COMMENTS

1.1. Population growth and housing targets

Whilst we understand specific housing targets are yet to be developed as part of future precinct planning, at this stage Council raises concern about the indicative population figures quoted in respect of St Marys and Orchard Hills.

The Draft Framework indicates the GPEC population will increase by around 135,000 people by 2056 and that *'more than half the new population will live around new Sydney Metro stations at St Marys and Orchard Hills'*. This statement in the Draft Framework is concerning, as it indicates more than 67,000 new people would live at St Marys and Orchard Hills by 2056. Council therefore raises concern with this scale of growth in St Marys and Orchard Hills as our understanding is that

this could occur more broadly across the GPEC area, not just around St Marys and Orchard Hills. Council does not support this statement and seeks clarity in this regard.

Whilst a direct comparison between the Department of Planning and Environment's (DPE) projections and Council's strategies is difficult, as best as we can ascertain, there will be a major difference between the projections in DPE's documents compared to the projected growth in Council's strategies.

The Draft GPEC Framework only provides population projections and does not include commentary on related housing or employment numbers making it difficult to determine likely development outcomes. Whilst a better understanding of population, housing and employment growth will come through precinct planning, it is noted that the base assumptions for DPE's projections (eg. Precinct boundaries and timeframes) differ from those used for our Local Housing Strategy and St Marys Town Centre Structure Plan, making it difficult to determine alignment with our local strategies.

Council's projected growth in St Marys to Orchard Hills indicates that around 29,300 additional people could live in Orchard Hills and St Marys in the future (by 2041). Notwithstanding the difference in timescales, the DPE projection of 67,000 new people to live in St Marys and Orchard Hills by 2056 indicates a large discrepancy in forecast growth between Council's projected growth for these centres (29,300) and the DPE (67,000).

We understand the GPEC Framework provides the basis to further investigate and determine population density, along with specific housing and jobs targets through a place-based planning approach as part of future precinct planning. To support this approach, the DPE will need to work closely with Council to reconcile geographical boundaries and population growth so that the GPEC Framework, our Local Housing Strategy and St Marys Town Centre Structure Plan are better aligned.

Council will continue to work with the DPE and agencies to plan for the St Marys and Orchard Hills Precincts and to identify how the expected growth can reasonably be accommodated in a sustainable way.

1.2. Ensuring local jobs for a growing population

Whilst we appreciate the focus on housing and accommodating population growth around new Sydney Metro stations at St Marys and Orchard Hills, Council reiterates the need to ensure a balance of land uses that delivers local jobs for the new population.

Council's projections for St Marys Town Centre propose the need to provide between 2,100 – 5,600 more jobs in the Town Centre by 2041 to continue to support St Marys' strong local economic base

across different sectors. Council's endorsed Employment Lands Strategy identifies a need for local employment zoned lands in Orchard Hills, to create opportunities for urban services as well as local small and medium businesses, and to support local community in addition to retail and population serving jobs in the centre.

It is noted that Action 3.1.6 addresses the need to investigate additional employment lands in the Orchard Hills Precinct. Our Employment Lands Strategy identifies potential opportunities to plan for new general industrial areas along the M4 Motorway and around Patons Lane Resource Recovery Centre and Metro stabling yard. These sites have good access to the motorway and new road connections to the Airport and would provide a suitable location for a range of medium sized businesses.

As above, we understand the GPEC Framework provides the basis to further investigate and determine specific jobs targets through a place-based planning approach as part of future precinct planning. Council will continue to work with the Department and agencies to plan for the St Marys and Orchard Hills Precincts and to identify how local employment opportunities can be delivered in a practical and meaningful way to support the growing population.

Furthermore, in support of this Action, the map on page 37 showing employment opportunities should also depict potential future areas for consideration within the Orchard Hills Precinct as described above.

1.3. Role of Orchard Hills Local Centre in the broader centres' hierarchy

Notwithstanding the identified need to provide new employment opportunities in Orchard Hills, it is important to understand where Orchard Hills fits in the context of other centres within Western Sydney. There are already significant employment lands in other strategic centres such as the Aerotropolis, Penrith and St Marys. Orchard Hills should provide jobs for a local centre but not compete with surrounding strategic centres and industrial lands.

As noted above, it is Council's view that a genuine mix and balance of residential, commercial, retail and community land uses will be essential to ensuring the success of the new Orchard Hills Local Centre. Additionally, the centre should be supported by local employment opportunities in the broader precinct area to ensure local jobs for local residents and facilitate a 30-minute city.

1.4. Design quality for priority precincts

Council notes and supports the key precincts for growth, including two priority precincts (St Marys Town Centre and Orchard Hills) and one precinct for potential longer-term growth (St Marys broader precinct). Table 1 identifies each of these and their strategic role. Whilst Priority 2 – Focused and Responsive Growth addresses a range of environmental, cultural consideration, and includes actions to enable vibrant places and neighbourhoods, there is an opportunity to better

emphasise the importance of design quality for these priority precincts. To this end, it is Council's expectation that priority precincts have high amenity and high-quality design outcomes as key directions in the finalisation of the GPEC Strategic Framework and subsequent precinct planning packages when released.

1.5. Provision for Emergency Services

Consideration should be made for the provision of emergency services infrastructure in the Orchard Hills Precinct given the projected population growth. This area has been identified as potentially beneficial due to its proximity to the M4, Great Western Highway and central positioning within the Penrith LGA, enabling a quick emergency response in all directions.

1.6. Local infrastructure and funding

Certainty or commitment from State Government is required upfront for new infrastructure required to support new growth areas. We support the intent that land should not be rezoned until Precinct Plans, Development Control Plans and Contributions Plans have been finalised. This will ensure we avoid the pitfalls of planning for the Aerotropolis where rezoning of land occurred in the absence of any meaningful infrastructure funding mechanism (refer to detailed comments in Council's submission on the Orchard Hills Discussion Paper).

It will also be important to ensure an appropriate mix of land uses and density, keeping in mind the feasibility and capacity of development to fund necessary infrastructure without compromising on a scale of growth/development that appropriately responds to the local environment. It is Council's expectation that growth is appropriately contained to limit urban sprawl and is supported by infrastructure.

1.7. Water infrastructure

Council supports the relevant Direction and Actions to provide upgraded and new utility infrastructure and facilitate the timely provision of new trunk drinking, wastewater, stormwater and recycled water networks throughout GPEC (especially Orchard Hills). However, it is considered essential that 'timely' is in fact 'up-front' to avoid uncertainty and potential delays and ensure the precinct can cater for planned growth over the short to longer term. Council's experience with planning for the Aerotropolis was that significant uncertainty was created due to delays in finalising the Contributions Plan, as Council could not fully determine whether Sydney Water's regional stormwater scheme would require additional contributions to be sought for local stormwater requirements (refer to detailed comments in Council's submission on the Orchard Hills Discussion Paper). It is also suggested that the Draft Framework should better address (eg. through a specific new Action) the need to utilise and develop sustainable water infrastructure with due consideration to economic, social and environmental implications.

2. COMMENTS BY CHAPTER

2.1. Part 1 – Introduction

The investigation area

Whilst St Marys has been earmarked as a pivotal area for future employment growth, greater priority appears to have been given to housing, rather than targeted employment initiatives that will yield actual job generating results. As noted previously, Council's projections for St Marys Town Centre propose the need to provide between 2,100 – 5,600 more jobs in the Town Centre by 2041 to continue to support St Marys strong local economic base across different sectors.

Council also continues to seek clarity around the projected future population, dwelling and jobs growth for Orchard Hills. It is important to ensure the success of the future Town Centre and surrounding urban area by delivering a balance of housing and jobs, supported by infrastructure, services and importantly green space. Access to employment close to population growth must be prioritised to realise the goal of a 30-minute city.

2.2. Part 2 – Strategic Context

The Draft Strategic Framework represents a significant opportunity to support the growing population of Penrith and identify emerging employment and industry development opportunity sites. To this end, the Draft Framework broadly aligns with Council's local planning directions set out in the Local Strategic Planning Statement (LSPS) and Places of Penrith Strategic Framework, including Council's endorsed Employment Lands Strategy, Local Housing Strategy, Rural Lands Strategy and Green Grid Strategy, along with the recently adopted St Marys Town Centre Structure Plan.

Page 19 makes reference to Council's Rural Lands Strategy as currently under review. This should be updated to reflect that this Strategy was endorsed by Council in September 2022. It would also be prudent to reference Council's St Marys Town Centre Structure Plan adopted in November 2022.

It should also be noted that Council is developing a Corridors and Centres Strategy (CCS) and Integrated Transport Strategy (ITS) as part of the Places of Penrith Strategic Framework which will sit alongside the other endorsed strategies. The CCS is expected to include place-based Structure Plans and master planning for key centres identified for future housing growth, particularly the East-West Economic Corridor (i.e. Penrith to St Marys). The Draft Framework should reference the CCS and ITS and require alignment with the outcomes and strategic directions through relevant Actions.

Regional Transport Infrastructure

Sydney Metro – The Draft Framework should be updated to reflect the recent NSW Government commitment to consider a business case for extension of the North West Sydney Metro Line from Tallawong to St Marys to improve public transport and access to the new Western Sydney Airport.

Outer Sydney Orbital (Stage 1) – Whilst Council appreciates the strategic objectives of the Outer Sydney Orbital project, its impact will need to be carefully considered as more detailed planning is progressed for the affected areas. Council would appreciate early planning and discussions with Transport for NSW (TfNSW) to be satisfied that suitable possibilities exist for facilities directly linked to or inside the corridor.

It is Council's strong view that without commitment to delivery of necessary transport infrastructure, including road upgrades, further growth in GPEC is premature.

2.3. Part 3 – GPEC Vision

Council supports the GPEC vision statement and six supporting planning priorities, subject to the comments provided in 2.4 below.

Page 25 includes a note on 'Defining growth'. This statement should also highlight the importance of ensuring projected growth of jobs in specific industries considers the flow on impacts from Western Sydney International Airport and Sydney Metro WSA from 2026, such as tourism, hospitality, aerospace, recycling/energy, and creative/cultural sectors. In turn, planning should seek to align and attract investment that encourages businesses in these specific industries.

Page 26 identifies 'Focus precincts' for growth, including Orchard Hills Urban Release Area. The strategic 'mixed-use' role of Orchard Hills should equally prioritise jobs to balance new housing delivery.

2.4 Part 4 – Planning Priorities

Council supports the six identified planning priorities to achieve the vision for growth in GPEC. Notwithstanding, we have identified a few areas where we consider the Directions and Actions could be strengthened and/or amended prior to finalisation. These are detailed below for consideration and action as appropriate.

Note: Specific comments on the GPEC Social Infrastructure and Needs Assessment are provided in Part 3 of this submission and may help to further inform actions under Priorities 4 and 5.

2.4.1 Priority 1 – Connect with and care for Country

Council strongly endorses this priority in the context of Penrith's growing Aboriginal population, as well as its unique identifying heritage and interpretation opportunities to enhance contemporary tourism and experiences in key precincts such as Penrith Lakes, Nepean River and Kingswood/Werrington. It will also help to position Penrith as a premier destination for cultural experiences and enhanced connection to country through place-based interventions, such as wayfinding using Aboriginal place names/dual naming. The need to have greater Aboriginal community engagement has been identified and highlighted, particularly in growing jobs for this community sector.

With regard to Figure 12 'Opportunities to connect with and care for country', it is noted the single circle 'places of shared culture for Aboriginal community' is only represented at St Marys and Mount Druitt stations. Clarification is sought as to whether this is correct/intended or if other areas should also be depicted. It is also difficult to differentiate between the icons for 'Cranbrook Formation' and 'CPCP Strategic Conservation Area'.

On page 29, please add view lines from Orchard Hills Local Centre to the Blue Mountains.

2.4.2 Priority 2 – Focused and responsive growth

Housing growth has been highlighted in this priority. Council supports the development of a diverse range of housing, to support the projected growth in population, particularly in affordable housing. However, it is important to also include considerations for attracting industries/businesses as job generating opportunities, as a balance to housing growth (cross reference to Priority 3).

To prevent future socio-economic challenges, it is important that affordable, community and social housing is balanced, distributed across multiple locations and that it is indistinguishable from market housing. Council is mindful to avoid the past mistakes made by historic delivery models that lacked diversity and integration. It is also important to ensure population serving businesses are encouraged to locate within proximity to housing clusters. There is an opportunity to consider attracting investment/development in Build-to-Rent models that have the potential to provide long lasting community benefits, with greater housing choice for tenants by expanding access to high-quality dwellings that are affordable in an unstable rental environment.

In respect of St Marys, Direction 2.1 should additionally include an action that reflects Council's intention to further investigate the character and potential land uses in North St Marys industrial land, as identified in the endorsed Structure Plan, through Council's St Marys Town Centre Master Plan process.

Comments on Actions

Action 2.1.2 – Add *new employment opportunities* to the sentence “...rezone a new mixed-use centre at Orchard Hills that capitalises on the new Metro station; provides for diverse housing, supporting infrastructure, retail and local services...”.

Action 2.3.6 – Consider changing “Design new residential precincts to ‘prioritise’ (rather than simply support) walking and cycle-friendly neighbourhoods...”

Action 2.3.7 (ii) – We support this action but reiterate our approach taken for the Penrith Rural Lands Strategy of not encroaching into our rural area to meet housing supply targets. Priority should be given to the importance of preserving Penrith’s ‘Rural Edge’ as identified in Council’s Rural Lands Strategy, which is aligned with the District Plan intent for a Metropolitan Rural Area.

Action 2.3.7 (vi) – Consider adding “...and reserving quality scenic vantage points for public uses.”
Eg. parks in new urban areas.

2.4.3 Priority 3 – Diverse and accessible employment

Council supports this priority as essential to balance the delivery of new housing, particularly in growth areas along the Sydney Metro WSA corridor. To this end, we acknowledge the focus on the commercial and mixed-use centres of St Marys and Orchard Hills. However, there is also an opportunity to strengthen the role of other employment locations, such as The Quarter Health and Education Precinct, and industrial precincts such as St Marys North Dunheved, Penrith North and Erskine Park.

It is also imperative to consider the need for higher quality jobs, particularly in St Marys and Orchard Hills, and this can be influenced by providing the planning conditions that encourage investment in identified industries, that ensure this region is a major employment and housing generator, although this will also be dependent on market conditions post COVID, and macro-economic factors.

The current top industries in Penrith that are expected to continue beyond 2041 and should therefore be considered in the context of GPEC include:

- Health Care and Social Assistance (+5,233 local workers); Construction (+3,826 local workers); Wholesale Trade (+1,920 local workers); Transport, Postal and Warehousing (+873 local workers).

Other economic and employment outcomes (key industries) to consider and encourage in the context of GPEC include:

- Manufacturing; Transport; Freight and Logistics; Recycling/Waste; Airport/Aerospace; Agribusiness; Health and Aged Care; Education and Research; Tourism and Hospitality;

Creative and Cultural.

These industries offer opportunities to improve diversity and accessible employment but require connectivity to transport hubs and diverse housing options to attract the desired population growth and types of skilled workers to cater for these jobs.

Both St Marys and Penrith Town Centres are key visitor destinations in the region. Investment should be encouraged to grow capacity in short-term commercial accommodation and conference facilities to accommodate increased demands as a flow-on from activities at the Western Sydney International Airport. It would also be prudent to consider supply chain and procurement alignments at the Defense Establishment Orchard Hills by encouraging businesses to relocate in the area.

2.4.4 Priority 4 – Infrastructure delivery

Council supports this priority as essential to support a growing population. However, as noted previously it is essential that certainty or commitment from State Government is secured upfront for new infrastructure required to support new growth areas such as Orchard Hills. Without strong commitment to timely delivery of necessary infrastructure, further growth and development in areas such as Orchard Hills South is premature.

The Draft Framework seeks to support a comprehensive and connected public transport network facilitating the movement of people to centres and destinations, 15-minute neighbourhoods and a comprehensive walking and cycling network, with links to places outside GPEC. However, it is noted that the Draft Framework is silent on rapid bus services, which is a commitment under the Western Sydney City Deal.

Council supports additional public transport and active transport infrastructure to provide access to employment and key educational locations. Planning for future transport infrastructure should capitalise on increased growth around Metro stations. In addition, there is an opportunity to explore walking/cycling trails to connect the Nepean River, Penrith Lakes and Nepean Business Park precincts to key employment hubs and tourism destinations.

Council is currently developing an Integrated Transport Strategy (ITS) as one of the key evidence-based strategies comprising Places of Penrith. It will deliver a high-level framework for evaluating detailed transport initiatives and land use planning that will help Council build our future transport network. The Draft Framework should require alignment with the outcomes and strategic directions in the ITS.

Council supports the proposed social infrastructure and open space projects, particularly those relating to arts and cultural facilities, a university campus for Penrith Centre, and the Penrith Courthouse expansion to create a Justice Precinct, like Parramatta. Whilst Council supports the

proposal for a university campus in Penrith to complement tertiary institutions at The Quarter, clarification is sought as to how the two facilities would work together. The Framework should also consider the provision of age-care facilities, which provide significant employment opportunities and reflect a growing need. Penrith's aging population by 2041 will surpass some other Metropolitan Sydney centres.

Council supports the development of Penrith Lakes for tourism and recreation uses.

Page 47 Action 4.3.10 states *"Expand existing central and branch libraries and investigate opportunities to include library services in new or expanded multipurpose community hubs"*. Council's Draft Library Services Strategy supports the development of a larger St Marys Library, in line with Council's endorsed St Marys Town Centre Structure Plan, Outcome 1. The research conducted for the strategy also highlighted that Penrith would likely require an additional library branch in Orchard Hills in the next 10+ years due to projected growth in that area.

It is noted that the Social Infrastructure and Open Space Needs Assessment indicates that a new library should be provided as part of a community hub in the Kingswood and Werrington Precinct and that a satellite library service should be considered for Glenmore Park. This differs from Council's Draft Library Services Strategy which recommends that a site in Orchard Hills would be best suited to deliver the required fourth library branch to properly service the Penrith LGA (not Kingswood/Werrington). It is also relevant to note that Penrith City Library did have library branches at South Penrith and Emu Plains. However, those branches were closed in 2008 and 2014 respectively due to low usage which was attributed to their limited collection size and space, and due to their proximity to the Penrith Central Branch Library.

It is important to note that NSW State Library benchmarking recommends that public libraries provide adequate space in line with the size of each Council's geographical area. The recommended total library branch floor space for the Penrith library service is 7,146 m². Penrith Council currently provides 4,214 m², which is 2,932 m² below the recommended library space required. This being the case we would require a library branch of approximately 2,000–3000m² at Orchard Hills to properly service the community.

Comments on Actions

Action 4.1.6 should be expanded beyond just Orchard Hills to look at all north south connections, including the Werrington Arterial Stage 2 and other key north-south arterials.

Action 4.3.3 seeks to identify school infrastructure needs at nominated locations. Consideration should also be given to identifying locations for future universities/satellite universities in Penrith and, if viable, in St Marys and new development areas such as Orchard Hills.

Action 4.3.4 – Update to include work with Council as well as School Infrastructure NSW on new

and upgraded education facilities supported by quality walking, cycling and public transport connections to reduce car dependency for school trips.

Action 4.3.5 – Consider using school facilities to increase usable open space via co-location and shared community and school use arrangements. Identify case studies where this has worked well for school, community, and Council.

Action 4.3.9 – Planning for new or expanded multi-purpose community hubs should include reference to an expanded multi-purpose community hub at Arthur Neave Hall in Werrington.

Action 4.3.10 – Council supports seeking opportunities to include library services and multipurpose community hubs. It should be noted that libraries can be co-located with community hubs but not replace community facilities provision. Consider also exploring business incubator spaces or shared workspaces to assist emerging or existing home-based businesses to expand, as well as cater for current work from home trends.

Action 4.3.18 – Plan a new multipurpose indoor sport and recreation facility close to the Orchard Hills Sydney Metro station, consider opportunities to co-locate with a potential new high school; and consider the need to expand the facility beyond 2036. Council has received funding through WestInvest to develop a 10-court indoor centre in the city with a site identified at Putland Street, Claremont Meadows. A new aquatic centre with ancillary community facilities on the Orchard Hills South site is supported. Add “A new District Neighbourhood Centre for Orchard Hills, 400 – 800 metres from the new Metro Station and shops, as follows (potential for co-location with recreational space):

- Size: 1000m² minimum
- Capacity: 400 people
- Components required:
 - Community service organisations offices (subsidised space)
 - Small hall for community hire for physical and craft activities. Capacity 100 people minimum.
 - Meeting rooms of various sizes for community hire.

With regard to Table 2 – Open Space, Council requests greater consistency with draft Greener Places recommendations as follows:

- Change 50 dwellings/ha to 60 dwellings/ha
- Include (barrier free)
- 0.15ha small park for high density**
- Include Sporting Spaces as a separate line item in addition to District Park.
- Regional Parks minimum size 20ha
- Linear parks 20m minimum width

** It is preferred that the minimum size of a local park is 5,000m². It is recognised that smaller spaces can provide for local amenity but are not adequate for a diverse range of recreation needs. The smaller parks need to be clearly supported by connected larger open spaces in the network. The public open space network should offer a range of landscape settings for activity and the range of activities offered.

Further consideration should be given to including general open space capacity measures for small and local parks (1,500 residents to 5,000m²) of parkland within 500m or outdoor sporting land 1,000 people/ha. For district and larger parks, capacity limits are reached with 5,000 people per 0.5ha within 5km.

2.4.5 Priority 5 – Public open space, biodiversity, and landscape

Council supports this Priority which seeks to ensure growth in GPEC provides opportunities to recognise and connect with green infrastructure and landscape features, enabling the protection of biodiversity and increasing public open space. This broadly aligns with Council's endorsed Green Grid Strategy (GGS) in so far as it outlines a plan to support the creation of cool and green neighbourhoods across Penrith and encourage active transport by connecting schools, public transport and town centres with green infrastructure such as green spaces, parks, waterways and bushland.

Native vegetation within the GPEC area, and Orchard Hills Precinct in particular, generally consists of Cumberland Plain Woodland. However, much of it is highly modified as a result of past and current land uses, including agricultural uses and residential development, both of which have resulted in significant clearing. There is an opportunity to ground truth the identification of the Avoided Lands, and identify any amendments required to the Cumberland Plain Conservation Plan (CPCP) Avoided Lands.

Action 5.1.1 seeks to ensure development respects natural systems, the conservation of natural landscapes and biodiversity corridors etc. while Action 5.1.2 references specific opportunities relating to open space along major creek corridors including Ropes Creek and Wianamatta South Creek. In addition to these, the Blaxland Creek Corridor (identified as a priority project in both the Western City District Plan and Council's GGS) presents potential opportunities for recreation, open space and biodiversity linkages throughout the GPEC and Orchard Hills precincts that may warrant reference and further consideration.

There are important sub-regional corridors providing core habitat and potential connectivity opportunities throughout the GPEC area. Within these corridors there are numerous local linkages which may provide remaining vestiges of connectivity within developing urban centres. Opportunities should be sought to rehabilitate connectivity in strategic areas to ensure overall functional connectivity is maintained or improved, especially as these areas transition to more

urban and industrial land-use types. However, for these areas to be effective as corridors, consideration needs to be made regarding the maintained width of both the main riparian linkages and their tributaries.

2.4.6 Priority 6 – Resilience

Council supports cooling the Western Parkland City. The Draft Framework should consider increased tree canopy targets across the GPEC area, in particular for new growth areas and key industrial sites. Also ensure climate control interventions are part of the approval/Green Star ratings.

Although all the policy/strategy documents that support this Framework are noted upfront, the Vision (Part 3) could provide more commentary around how the planning priorities fit with goals around energy efficiency/renewable energy/low carbon, and circular economy. There is an opportunity to develop Orchard Hills as a demonstration project for a carbon-neutral mixed-use centre. There is also an opportunity to deliver renewable energy projects, such as a community battery for Orchard Hills.

There should be an action around sustainable transport and encouraging electric vehicles/charging infrastructure hubs and future proofing of EV charging capability incorporated within developments/planning proposals, as well as connections with other transport networks/infrastructure.

This priority includes a risk-based approach/considerations of flood and bushfire hazards in planning. However, heat is not incorporated within this priority as a natural hazard. There is an opportunity to include considerations for heat mitigation/adaptation – e.g. climate adapted building/urban design principles into development/planning proposals, to help increase the resilience of buildings and reduce greenhouse gas emissions through the inclusion of low carbon embodied materials in the design and construction of buildings.

The Draft Framework includes the concepts of movement and place, and enabling walking/cycling and public transport connections. However, there needs to be a greater link between transport modes and green infrastructure/tree canopy. For instance, an action for tree canopy/green infrastructure along key walking/cycling routes to provide shade and cooling, and climate adapted facilities – eg. bus shelters, along key public transport routes to encourage use of public transport and enhance comfort while waiting.

It should be noted that Council is currently developing suburb specific tree canopy targets as an important next step towards implementing Council's LSPS, Resilient Penrith Action Plan and Green Grid Strategy, all of which identify an action to develop tree canopy targets for the Penrith LGA, with a view to reducing urban heat and cooling our city, improving the resilience of our communities, and increasing liveability. This project will be a component of Council's Corridors

and Centres Strategy (under development). The findings and recommendations of Council's tree canopy targets should be used to inform future planning for GPEC centres and growth areas including the Orchard Hills Precinct.

With regard to Table 3, proposing urban tree canopy targets for public open space of 45% our preference at this stage would be to maintain the earlier 40% canopy targets set for these RE1 land uses to ensure Council has adequate resources to maintain and manage a healthy urban tree canopy. In setting canopy targets, consideration must be given to not creating pressure to meet average canopy targets in public open spaces that may affect the functionality of the public open space and the diversity of activities it can provide for. It is important that in achieving a performance-based planning approach, that the land proposed for sport and recreation is fit for purpose.

2.5 Part 5 – Infrastructure

Council supports the overall regional and district social infrastructure, open space, utilities and services and strategic transport infrastructure lists. However, we note the projects identified are currently unfunded and there is a lack of commitment from partners. Furthermore, it is noted that Table 6 is silent on rapid bus services, albeit a commitment of the Western Sydney City Deal as previously mentioned in this submission.

The following comments are provided in respect to Table 4 on page 61 of the Draft Framework, related to social infrastructure in the Penrith LGA. It is also suggested that this table could benefit from an additional column labelled 'for investigation'.

Category	Infrastructure item	Indicative delivery timeframe	Function	Potential funding source/s	Key agency involvement	Map Ref	PCC Comments
Community facilities	Kingswood Community Hub (new or expand an existing facility)	Medium	Supporting	State infrastructure contributions, local development contributions, grants	Penrith City Council	KW1	Supported
Mount Druitt and Rooty Hill Community Facilities	Aboriginal artist and creative industries precinct potentially in Mount Druitt and Rooty Hill, Luxford, or St Marys	Short-medium	Supporting	NSW Government, state infrastructure contributions, grants	Blacktown or Penrith City councils, Create NSW	L2	Supported

Community facilities	Orchard Hills South Community Hub (new)	Medium	Enabling	State infrastructure contributions, local development contributions, grants, VPAs	Penrith City Council	OHI	Supported
Community facilities	Penrith Centre Community Hub (investigate)	Medium	Supporting	Council funding, state infrastructure contributions, local development contributions, grants	Penrith City Council	PC1	Supported
	Joan Sutherland Performing Arts Centre (expand)	Medium	Supporting	NSW Government, state infrastructure contributions, grants	Penrith City Council	PC2	Supported
Community facilities	St Marys Community Hub (planned)	Short-medium	Supporting	Council funding, state infrastructure contributions, local development contributions, VPAs, grants	Penrith City Council	SM1	Supported
	Aboriginal artist and creative industries precinct potentially in Mount Druitt and Rooty Hill, Luxford, or St Marys	Short-medium	Supporting	NSW Government, state infrastructure contributions, grants	Blacktown or Penrith City councils, Create NSW	L2	Supported if in close engagement and co-design with Aboriginal community.

3. COMMENTS ON SUPPORTING DOCUMENTS

GPEC Social Infrastructure Needs Assessment

Section	Page	Version 1/10/2022 Urbis/GPEC Comment	Exhibition Version 18/11/2022 PCC Comments
5.2 Directions for Education Infrastructure	32	Dot point 1 - Locate new primary and high schools, where possible, to promote shared use of facilities, open spaces and resources.	Confirmation is required that the planned High School (2.5ha - 4ha) and Primary School (1.5ha-2ha) must accommodate the required infrastructure for break out

		Broad discussion around co-location of school infrastructure and standard sizing for new schools.	areas for recess, lunch, OOSH, and PDHPE. Support planning for sportsgrounds adjacent to sports fields (if co-located) to support school competition matches and gala days servicing two or more schools. Shared use agreements would need to be developed to ensure that the capacity of the fields is not exceeded and there is also option of shared community use of school facilities.
5.4 Cultural Facilities – Arts and Cultural Centres	41	Dot point 5 – Working with Aboriginal stakeholders to create a purpose built Aboriginal cultural facility in the GPEC area, supporting local Aboriginal culture and storytelling. Potential locations include Luxford, St Marys, and Mt Druitt precincts.	Consider the proposed new Aboriginal community centre in Cranebrook.
Creative Spaces District	42	Existing provision – There is one arts and creative centre in the GPEC area: The St Marys Corner Arts and Crafts studio. This studio is occupied by the Nepean Potters Society and is co-located with a range of other community facilities including a community centre, senior centre and hall.	Consider utilising existing under utilised community facilities for creative expression. Sewing and other craft and creative activities are undertaken across a broad range of community centres.
Multi-purpose Community Centres	47	Dot point 5 – While there are several local centres, there are currently no multipurpose community centres in the Luxford, Ropes Crossing, Orchard Hills, Kingswood and Werrington, Penrith Centre, and Penrith West Precincts.	Page 45 states that Werrington has no district size facilities, but then later in the document Harold Corr, located in Werrington, is listed. Needs clarification. Penrith Seniors is a large multipurpose Community Centre located in the City Centre and needs to be considered.
5.3 Sports Stadiums, Specialist Sports Facilities and Showgrounds	49	This section discusses sports stadiums generally – needs further detail	Needs further information on Penrith Lakes Regional Parkland and the future needs/directions for Penrith Whitewater Stadium and Sydney Regatta Centre. Public accessibility and connectivity to these locations is essential.

Sports Stadiums, Specialist Sports Facilities and Showgrounds	49	<p>New: There are two specialist facilities serving a metropolitan-wide function in the Penrith Lakes Precinct: Penrith Whitewater Stadium; and Sydney Regatta Centre.</p> <p>There are several smaller specialist sports facilities in the GPEC area including a tennis centre and a BMX facility in South Creek Recreation Precinct in the St Marys Precinct, hockey facilities at WSU Kingswood Campus in the Kingswood and Werrington Precinct and a Riding for the Disabled centre in the Orchard Hills Precinct (see Section 'Open space'). There are also indoor sports venues catering specifically to basketball and gymnastics in the Mount Druitt and Rooty Hill Precinct (see Section 'Indoor sport and recreation facilities').</p>	Note this item requires additions/amendment - as specialist facilities there is the Penrith Valley Regional Sports Centre in Cambridge Park, Troy Adams Archery Field at Werrington, synthetic athletics track at Harold Corr Oval, Cambridge Park, National Training for Women's Rowing at Weir Reserve, Penrith.
Aquatic Centres - Opportunities and Challenges	50	Opportunities and Challenges: There is capacity on the site of Ripples St Marys and surrounds to enable future expansion of pool facilities	Council has an adopted Structure Plan for St Marys and planning needs to be aligned with this.
	50	NEW Existing provision• Initial Office of Sport investigations indicate there is an existing shortage of aquatic facilities in Blacktown and Penrith LGAs, in particular deep-water pools that can cater to specialist sports such as diving, water polo and synchronised swimming.	Expansion of existing sites at St Marys or Penrith for similar infrastructure to support activities would need master planning and government funding.
Aquatics Centres	51	Dot point 2: Expand Ripples St Marys in the master planning of The Kingsway, St Marys, due to Outer Sydney Orbital	This should be South Creek Park in St Marys and not The Kingsway, Werrington. Both areas are subject to flooding, The Kingsway would be significantly affected, therefore making expansion difficult. Council has an adopted Structure Plan for St Marys and planning needs to be aligned with this.

Indoor Sport and Recreation Centres – Opportunities and Challenges	52	Dot point 1 – opportunities and challenges. There will be a need for a new recreation centre to support the future community of the Orchard Hills Precinct.	Penrith has received funding through WestInvest to develop a new 10 court multi-purpose indoor recreation centre with 6 squash courts (flexibly designed as activity rooms), outdoor wheeled sports rink, multi-purpose rooms, ancillary administration and support facilities, and car parking at Putland Street, Claremont Meadows. A catchment analysis, business model, QS and social and economic benefit cost benefit analysis has been completed. The centre will service a citywide catchment and complement the soon to be developed Gipps Street Recreation Precinct, creating a recreation heart in the City. The site is approximately 1.6km from the Orchard Hills station precinct.
Indoor Sport and Recreation Centres – Directions for Future Provision			It would be helpful if the joint use of school hall facilities was included in this section.
Indoor Sport and Recreation Centres – Directions for Future Provision	53	Dot point 1– Expand Penrith Valley Sports Centre as per the Sport and Recreation Strategy.	Council has received funding through WestInvest to develop a 10-court indoor centre in the city with a site identified at Putland Street, Claremont Meadows.
Indoor Sport and Recreation Centres – Directions for Future Provision	53	Dot point 2 – Consider expansion at Ripples Penrith and St Marys to incorporate 4 courts.	Given the existing built form, floods, and land uses around each of the Penrith and St Marys sites, it is difficult to provide sufficient space for the construction of a Multi-Use Aquatic and Indoor Centre with at least 4 courts. More consideration needs to be given to site feasibility. Council has an adopted Structure Plan for St Marys and planning needs to be aligned with this. Council has received funding through WestInvest to develop a 10-court indoor centre in the city at a site identified at Putland Street, Claremont Meadows.

Indoor Sport and Recreation Centres – Directions for Future Provision	53	Second last dot point: “growth and the proposed metro station. This location will align with Office of Sport directions in relation to locating indoor facilities close to transport hubs. Consider opportunities for co-location with a potential new high school, and opportunities for”	Council has received funding through WestInvest for a multi-sport indoor centre to be located at Putland Street (adjoining Gipps Street Recreation Precinct), Claremont Meadows. Orchard Hills South could have value as a location for an aquatic centre and ancillary recreation and community infrastructure.
Indoor Sport and Recreation Centres – Directions for Future Provision	53	Work with the Office of Sport to identify sporting needs and requirements for each GPEC precinct and to inform the design and programming of indoor sport and recreation facilities.	Work with the Office of Sport and Local Government....”
5.5 Open Space	56	Population based approach The Penrith Sport and Recreation Strategy also uses population... 2.4ha per 1000 people, plus additional 1.0ha per for city wide	Amend to: The Penrith Sport and Recreation Strategy also uses population... 2.6ha per 1,000 people, plus additional 1.0ha per 1,000 each for city wide and linear parks.
Open Space	58	Target Provision Minimum size 5ha	Needs to be expanded to include 20+ha for regional/ metropolitan city-wide sporting precincts – large precincts open space as per the Greener Places Design Guide. This document will inform future localised open space planning for new release areas. Minimum 5ha for regional open space does not support shared multi-purpose activation zones for sports facilities, picnics, urban parks, and dog parks.
Open Space – Opportunities and Challenges	58	Opportunities and Challenges Needs further detail – see comment	Include Central Precinct Regional Open Space, Jordan Springs consisting of around 28 hectares of Sport and Recreation Reserve. Jordan Springs Regional Open Space with Wianamatta Regional Park on the east, and South Creek on the south and east. The intended primary uses of the reserve include play space, amenities, four cricket ovals, overlayed six multipurpose rectangular fields. In addition to an additional cricket oval, cricket practice facility, netball and multi-use courts, parking, and shared paths.
	58	Opportunities and Challenges Needs further detail – see comment	In the Penrith Lakes Regional Parklands point, the sport and recreation facilities (in addition to SIRC and PWS water sports) should be improved and specified.

Open Space	58	Dot point 4 – There are opportunities to increase the quality, functionality, and diversity of uses offered in some regional recreation precincts in the area. For example, in the endorsed St Marys Structure Plan identifies opportunities to upgrade South Creek Park to a regional sports and recreation park.	South Creek Park is recognised as an important city-wide (not regional) open space that provides specialised sporting facilities and opportunity for the community to live an active, healthy lifestyle and engage in sporting events and competitions. South of Kingsway Road, South Creek Park contains a large passive area. The St. Marys Structure Plan places emphasis on the benefits and reinforces the necessity of a green activity spine.
Open Space	59	Key Features and Inclusions Include clusters of at least two multipurpose sports fields and/or groupings of outdoor multipurpose courts that can accommodate training and competitions for multiple sports, amenities, onsite parking and setbacks or buffer zones.	Minimum recommended 10ha for district space for either 2 ovals or 4 rectangular fields, courts, amenities, on-site parking, and buffer spaces for adjacent uses. Local facilities are more suitable with at least two multipurpose sports fields/oval.
Open Space	59	Target provision – Between 2ha- 5ha – Need to include 10 ha plus for District Sports Precincts as per the Draft Greener Spaces Design Guide	Suggest this is between 5ha – 10ha to support the Greener Places Design Guide. Local facilities are between 2 – 5ha.
Open Space	59	NEW: Initial Office of Sport investigations indicate there is an existing shortage of sports fields across the Blacktown LGA and a minor shortage across the Penrith LGA, in particular multipurpose fields that can accommodate different combinations of sport. There was also reported to be a shortage of hockey fields across both LGA's.	Clarification is sought as to what constitutes a 'minor' shortage, as it appears there is a moderate to significant lack of active open space. To accommodate current and projected population increase, Penrith Council estimates 84 hectares of extra active open space would be needed by 2036 to accommodate an estimated 48 more sports fields. Depending on future transport infrastructure and growth, this number might expand by 50 to 60 hectares. The additional area required represents around 35 percent of Penrith's existing active open space provision, based on current participation trends and numbers.
5.5 Implications of Outer Sydney Orbital	60	Table 2 Summary of OSO South Creek Recreation Precinct impacts on open space...	Table 2: The corridor indicates that it will also impact football field and CARES road safety and learn to ride facility at South Creek Park. Several directions propose effective master planning for open space, indoor, hydro, and aquatic facilities in the corridor area. Council would appreciate early planning and discussions.

	60	Table 2 Summary of OSO The Kingsway Sporting Precinct	Table 2 The proposed infrastructure looks to affect two or three cricket, Oz tag, and touch football fields in Kingsway North Playing Fields in addition to the two or three grounds within Kingsway South Playing Fields that are currently used as rugby league fields. There are no current conversations or plans with TfNSW to provide alternative recreation space. Council would appreciate early planning and discussions.
	60	Table 2 Summary of OSO Riding for the Disabled Nepean Centre	Table 2 Update to acknowledge: The proposed infrastructure may impact the existing Samuel Marsden Riding Facility. Discussions need to be held to agree to provide alternative recreation space.
6.1 Summary of Recommended Proposed Infrastructure tables	71	D10 & D11 Ripples Leisure Centres St Marys and Penrith	The description of Infrastructure Ripples St Marys talks about Ripples Penrith in the description. Neither description addresses Office of Sport's direction for deep water sports facilities.
	71	Table 6.1 – D5 St Marys Indoor Sport and Recreation Facility	The description should be considered or investigated, as the site is currently constrained.
	72	Table 6.1 D8 & D12 Orchard Hills South Indoor sport and recreation facility and multi-purpose aquatic centre	Council has received funding through WestInvest to develop a 10-court indoor centre in the city with a site identified at Putland Street, Claremont Meadows. A new aquatic centre with ancillary community facilities on the Orchard Hills South site is supported.
	73	Table 6.1 C9 South Creek Park and The Kingsway	South Creek Park and The Kingsway Sporting Precinct are two sites separated east/west by South Creek
	74	Table 6.1 C14 Jamison Park	What is meant by better use of land to the South was this meant for Whalan Reserve? Jamison Park needs to update facilities to maximise capacity and meet contemporary participation needs. The Western City District has seen a considerable increase in female participation in sport and recreation activities and existing facility requirements need to be updated to meet contemporary needs.