

28 October 2021

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By email: [adrian.hohenzollern@planning.nsw.gov.au](mailto:adrian.hohenzollern@planning.nsw.gov.au)

Dear Adrian

**RE: UDIA review of the NSW Department of Planning, Industry and Environment South West Growth Area Structure Plan**

The Urban Development Institute of Australia NSW (UDIA) is the peak industry body representing the leading participants in urban development in NSW. Our more than 500 member companies span all facets of the industry from developers, consultants, local government, and state agencies. UDIA advocates for the creation of Liveable, Affordable and Connected Smart Cities.

UDIA welcomes the opportunity provided by the NSW Department of Planning, Industry and Environment (DPIE) to participate in the early-stage review of the Structure Plan for the South West Growth Area (SWGA). We understand that this review will form part of a broader assessment of key planning policy, which includes the Western Parkland City Economic Blueprint, the Greater Sydney Regional Plan and the Western Sydney Aerotropolis.

We have formed a specialist working group comprising property developers and associated planning practitioners to assess the long overdue SWGA Structure Plan. We consider that the issues and recommendations presented in our submission should form a critical part of the review going forward.

Our comments are structured around the two summary points raised in your request, which include “Issues and Challenges” and “Opportunities and Recommendations.”

**Background**

The SWGA has experienced significant change from when the Structure Plan was originally prepared in the mid 2000's. This has largely occurred due to a substantial investment in transport infrastructure by the Commonwealth and State Governments surrounding the Western Sydney Airport and includes upgrades to Camden Valley Way, Bringelly Road, and The Northern Road and the plan to deliver the Western Sydney Airport Metro (the Airport Metro), which will further shape the SWGA.

There has also been a change in housing demand patterns, affordability, and residential densities (and thus population outcomes and community needs). Original planned densities of 15 dwellings / hectare have now risen to 60 dwellings / hectare in some areas, as buyers seek more affordable housing solutions on smaller lots and more diverse housing types. Increased population densities are resulting in demand for more regional and local services (community, recreation, and transport), as well as a desire for jobs closer to home.

Approximately 50 percent of the SWGA remains underdeveloped (excluding those areas north of Bringelly Road now in the Aerotropolis Precinct). This reflects poorly on SWGA relative to the progress of the North West Growth Area, which has experienced a faster rate of development.

Whilst there were two rezonings to provide greenfield housing in mid-2021 at Lowes Creek Maryland and Leppington Stages 2 and 5, for the most part, there has not been a sustained roll-out of precincts in the SWGA. Prior to this year, the last rezoning of a SWGA precinct was Leppington Stage 1 in November 2015. Evidence now clearly points to sustained market conditions with a significantly higher number of buyer registrations / interest (i.e., demand) compared to scarce lots for sale.

The proposed Aerotropolis will become the primary CBD in South West Sydney, with new industries emerging including airport ancillary functions, logistics, niche manufacturing and office-based jobs. This major investment provides opportunity to extend the proposed Airport Metro, which together with the Blue Green Grid initiative, will continue to shape the SWGA as a desirable place to live with good access to diverse job opportunities.

Based on these factors, UDIA considers that the SWGA will remain as the primary housing release area that will take the bulk of Sydney's greenfield growth for the short to medium term, especially with flooding constraints continuing to affect the growth potential of the North West Growth Area.

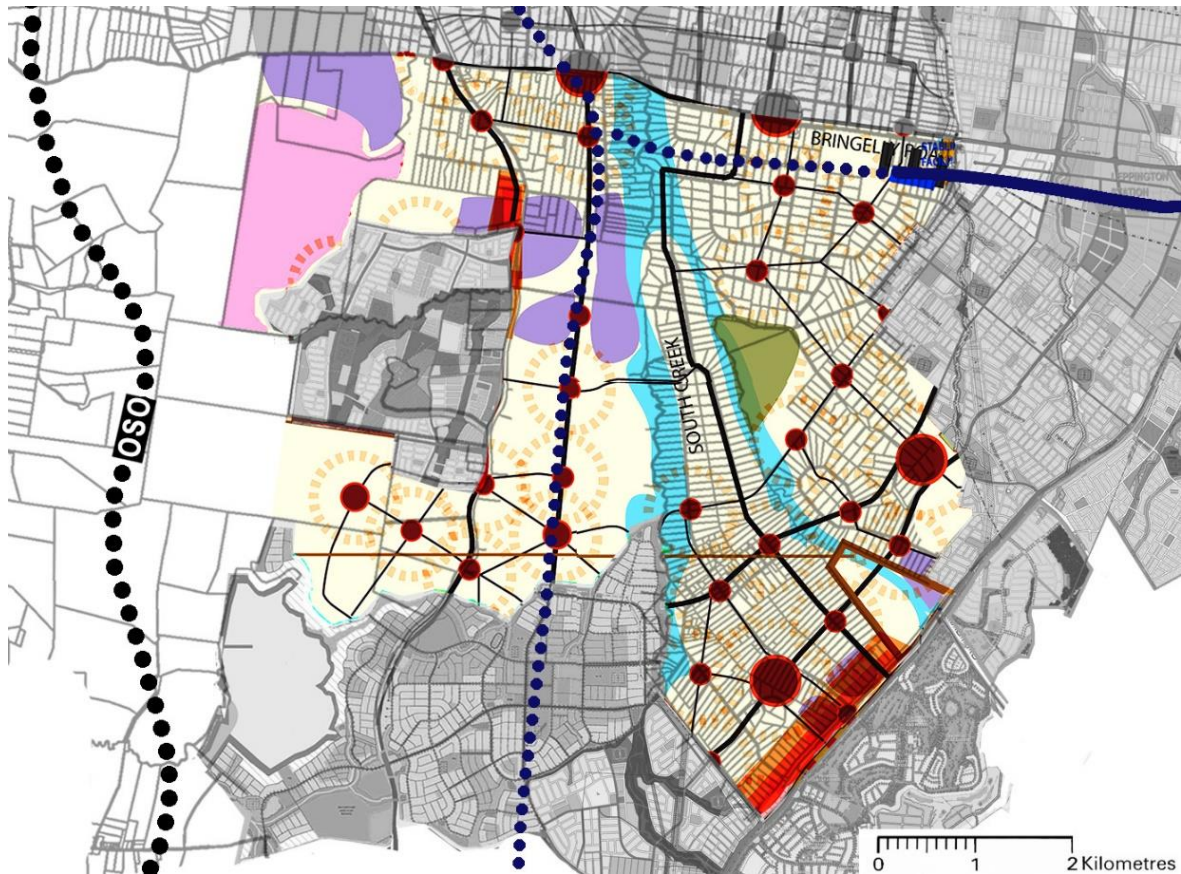
Your request for UDIA input is timely and will feed into a broader review of planning and infrastructure policy affecting the South West. Implementation of our recommendations and recommendations will ensure that the SWGA continues to respond to the demand for greenfield and brownfield supply at centres supported by services and infrastructure.

Given the scale of remaining development within the SWGA, we urge DPIE to embrace this opportunity to establish a revised and contemporary Structure Plan, which recognises the substantial changes in planning context, and which facilitates the delivery of high-quality place outcomes.

## 1. Issues and Challenges

Our primary Issues and Challenges are summarised below and illustrated in **Figure 1** on the following page.

- i) Proposed "major" road network in the Catherine Fields and Rossmore Precincts' does not respond to fragmented land ownership constraints, hindering their funding and delivery;
- ii) The proposed sub arterial road network is not clearly distinguished, nor does it accurately represent the evolving classified road network that is subject to funding via Special Infrastructure Contributions (SIC), and the finalised road networks adopted in zoned precincts of the SWGA. The Structure Plan should be upgraded in accordance with the 2016 AECOM plan (Refer to **Attachment No.1**);
- iii) Precinct boundaries are outdated and do not present a logical sequence of land zoning that would assist planning of infrastructure;
- iv) The balance of the SWGA to be rezoned does not correspond with the infrastructure growth plans (utility and community) as proposed by agencies and providers. Sydney Water is currently not able to provide any certainty of the timing of servicing these areas with sewer and water, which is impacting on Government rezoning efforts to increase supply of housing;



*Figure 1 – Balance of SWGA yet to be zoned indicating existing Structure Plan (Excluding Pondicherry (Advanced) Precinct Plan, Aerotropolis Precinct, and other Proponent Proposed Precinct Integrated Land Use Plan*

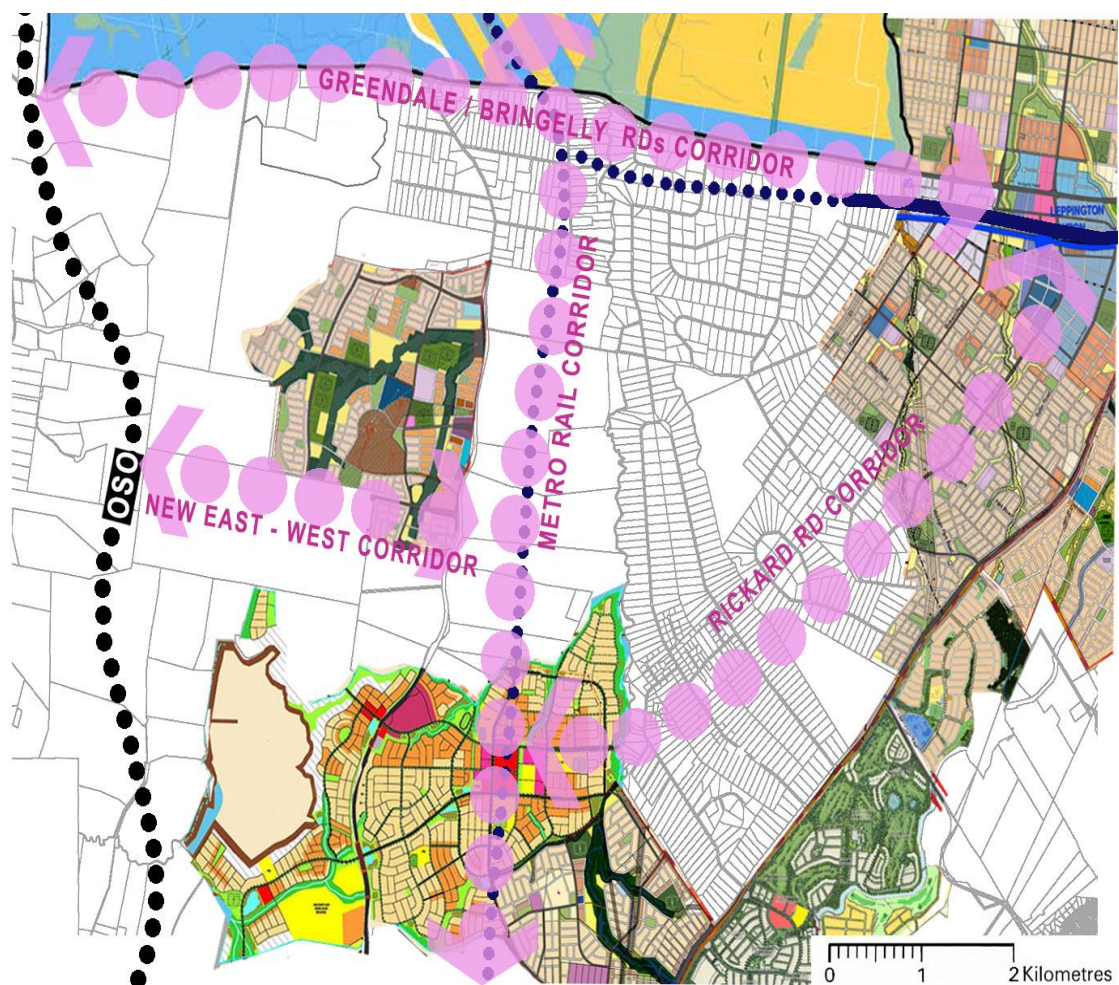
- v) The proposed pattern of centres hierarchy in the current Structure Plan has several issues:
  - a. It is based on a somewhat nostalgic decentralised “corner store” approach that does not recognise the characteristics of contemporary retail requirements including the opportunities and constraints;
  - b. It does not consider the new prospects presented by Government planned investment in heavy/metro rail in the SWGA; and
  - c. the proposed pattern of centres shown in the Plan no longer provides appropriate guidance to the distribution of residential densities within the SWGA, given the Government’s change in approach to higher densities coupled with its public transport strategies.
- vi) The proposed pattern and location of “industrial / Employment “ lands represent an outdated approach that does not acknowledge the following:
  - a. The presence of new employment areas at the Aerotropolis;
  - b. the evolution of employment areas to mixed use (large format retail / commercial / service / warehouse / logistics) precincts;
  - c. It still reflects the Aircraft Noise Emission Forecast constraints at the time of making the plan some 15 years ago.
- vii) Likewise, the mixed-use employment corridors along Camden Valley Way and The Northern Road have similarly been superseded by the constructed character of these roads, past rezoning outcomes (that have not adopted the vision contained in the Structure Plan) and the future presence of the Aerotropolis Precinct and rail corridors;



- viii) No regional open space (passive and active) recreation network nor Primary and Secondary school siting is shown to guide State and local contributions and site-by-site master planning (Integrated Land Use Plan preparation);
- ix) The flood liable land indicated on the Structure Plan is out of date; and
- x) The plan does not capitalise on opportunities that may be offered by the presence of evolving and future (confirmed) major planning influences including the Western Sydney Airport, the Bradfield CBC, the Outer Sydney Orbital (OSO), the Airport Metro, and the difficulties in delivering the vision for the Leppington Town Centre.

## 2. Opportunities and Recommendations

We have identified several Opportunities and Recommendations, which are presented below in **Figure 2**.



*Figure 2 – Plan Indicating Structure Planning Opportunities*

## 2.1 Focus higher residential density, employment, and mixed use along transport corridors

UDIA contends that new growth corridors should be created at the following locations within the SWGA:

- The Rickard Road Catherine Fields Corridor from Leppington to Oran Park;
- The Greendale and Bringelly Road corridor between Leppington and the OSO; and
- A future east west sub arterial road corridor link between Oran Park and the OSO (exact route to be confirmed).

### Airport Metro from St Marys to the new Bradfield CBD

The proposed Airport Metro from St Marys to the new Bradfield CBD provides an opportunity to connect the SWGA to the Aerotropolis and the broader Western Parkland City. This could occur with an extension to the south towards Campbelltown via Oran Park and to the south east towards Leppington Station, via Rossmore. The proposed metro/heavy line rail stations should inform the backbone of SWGA centre locations.

**Figure 3** provides the potential Airport Metro extensions previously investigated by UDIA in our *Western Sydney Place Infrastructure Compact Submission, October 2020*. The proposed metro/heavy line extensions could target growth at six new stations along two new transport corridors.

Edmondson Park points to a possible centre solution with a mix of residential and commercial at higher densities supported by open space and educational uses which are near an existing station. Edmondson Park provides evidence that a more diverse product range of housing is not only possible but also marketable.

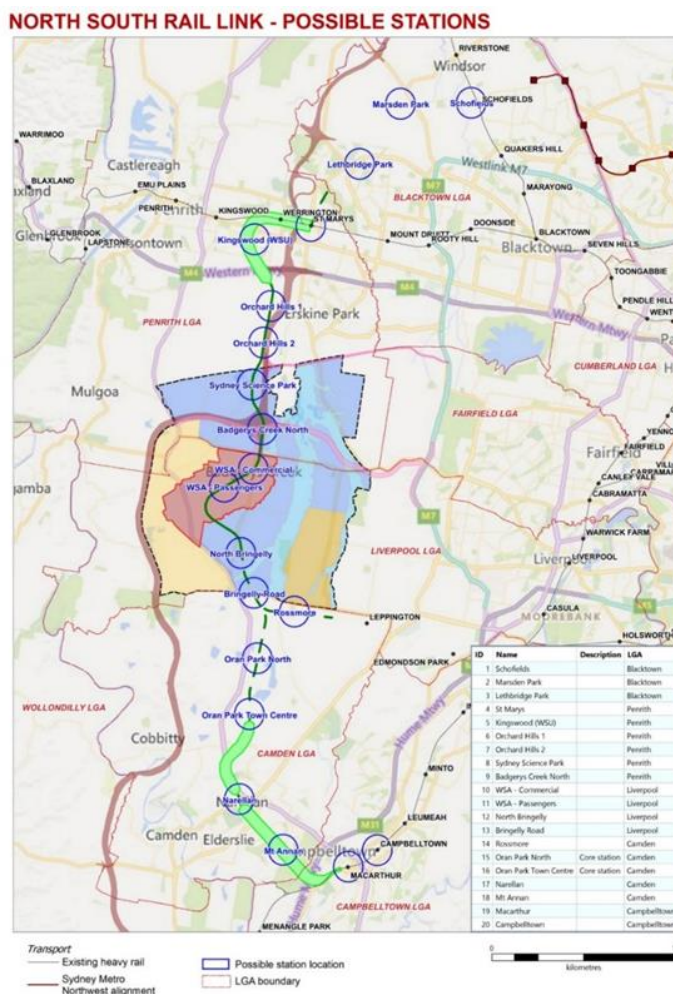


Figure 3 – Proposed extensions to the Airport Metro

Furthermore, the road-based corridors (including Bringelly Road, Greendale Road and Rickard Road), could become locations for new smaller scale retail and local employment centres at key strategic locations, with housing diversity supported by local community and infrastructure.

## 2.2 Review the location and hierarchy of proposed centres and to locate these within the proposed transport corridors.

Further to Opportunity 2.1, UDIA believes that a new centres hierarchy is required for the SWGA to move away from the grid-like presentation of small neighbourhood shops and villages presented in the Structure Plan. This would concentrate retail and services within corridors at strategic locations. All centres would have walkable catchments to varied housing types including apartments, villas, townhouses, aged care facilities and small lot housing, as well as a range of other uses.

Despite having access to heavy rail since 2015 and road infrastructure funding commitments, Leppington has failed to emerge as a “Major Centre”. The review should reflect on the status of Leppington as a Major Centre, especially once Bradfield further develops as a regional CBD. We believe there is still scope for Leppington to provide higher density housing once supply is exhausted at Edmondson Park. Leppington could instead become a medium sized centre within the context of a string of rail-based centres from Glenfield through to Bradfield. This corridor could help to better integrate or link Bradfield into the existing and planned urban structure, assisting its viability.

### **2.3 Review the Industrial / Employment lands and develop these as potential mixed-use employment precincts that reinforces the Aerotropolis as the primary employment hub in South West Sydney**

UDIA is concerned with the long-term viability of a proposed industrial and employment precinct, which fronts onto Bringelly Road at the north west of the SWGA. With the emergence of Bradfield as a regional CBD in which Government is strongly investing, the long-term use of this area for industrial and employment uses needs further review. UDIA supports a move towards mixed uses in this area, especially where a high level of amenity could be created to provide place making outcomes.

Smaller industrial precincts could still occur at strategic locations to accommodate light manufacturing uses not typically located in town centres. This outcome would be more in line with DPIE’s ongoing review of employment zones, which proposes a more flexible and contemporary approach to employment zoned land.

### **2.4 Review the Structure Plan based on a higher density residential yield that is supported by an integrated transport network**

UDIA notes that there has been a significant increase in residential density at housing releases from when the Structure Plan was originally developed. At this time, planning was based on a 15 dwellings / hectare low density yield, with lots ranging from 450 – 650 square metres. At some estates, residential density is now closer to a medium density yield with up to 60 dwellings / ha and 250 sqm lot sizes. However, for future rail-based centres, the density could be closer to 250 dwellings/ ha, similar to Edmondson Park.

The Structure Plan review should recognise that higher residential yields are likely to continue in the general residential areas, and that future rail-based centres should contemplate substantially higher densities, an example of which has been at Edmondson Park. This presents a challenge for Government to cater for increased demands for access to services both within and external to the SWGA, which can be overcome with strategic and integrated infrastructure planning outcomes.

### 3. Further Opportunities to shape the review

Further to our primary recommendations presented and our supporting commentary, UDIA believes that the Structure Plan review could benefit from DPIE also investigating the following secondary options:

- 1) A review of the road hierarchy based on the AECOM 2016 plan and revised land use change;
- 2) The opportunity to provide maximum flexibility with proposed planning controls to respond to change and allow more developer-led outcomes. This should also include an update to the SIC practice note that matches the AECOM 2016 plan;
- 3) A review of the *Western Sydney Growth Centres (Special Infrastructure Contribution) Determination 2011* to ensure infrastructure needed for the SWGA is funded; including integration of the revised Structure Plan with Transport for NSW's proposed road network;
- 4) The renaming of key precincts that better reflects their location within the SWGA;
- 5) The opportunity provided by city shaping planning tools (UDIA's Urban AI and Urban Pinboard UDP) to effectively plan for development and prioritise infrastructure at key rail-based centres;
- 6) The need to develop a 10-year horizon growth strategy to take forward the updated Structure Plan to give industry confidence that development at key precincts will occur in an orderly manner supported by infrastructure; and
- 7) The potential to expand the boundaries of the SWGA towards the proposed OSO to further maximise growth in this area, and to better link the SWGA with the Sydney regional road network. This land could be classified as "Future Investigation Areas" and released once all key engineering, environmental and planning constraints have been addressed.

### Conclusion

UDIA thanks DPIE for the opportunity to contribute to the early-stage review of the SWGA Structure Plan , which will shape the growth and development of this key area in Greater Western Sydney.

UDIA looks forward to continuing to work with DPIE to engage on our recommendations. We also seek a clear understanding of the proposed process so that we can appropriately engage members and ascertain their issues, with sufficient time to provide meaningful input, especially with the broader review of planning policy being undertaken in South West Sydney.

Should you have any further questions or to arrange a meeting, please contact David White, GWS and South Regional Manager on 0415 914 612 or email at [dwhite@udiansw.com.au](mailto:dwhite@udiansw.com.au)

Kind Regards,



Steve Mann  
Chief Executive  
UDIA NSW





Figure 5 Oran Park Precinct Road Hierarchy

