

# **Draft Western District Plan**

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# **Submission to the Draft Western City District Plan**

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# 1 Background

As owners of ~180ha of land in Mount Vernon, we are pleased that the Greater Sydney Commission has identified our site (Table 1 and Figure 1) as a 'Metropolitan Urban Area', sitting within the Western Sydney Priority Growth Area (WSPGA) as shown in Figure 2.

**We seek clarity on what 'urban' uses are envisaged for our site in consultation with us at the earliest opportunity.**

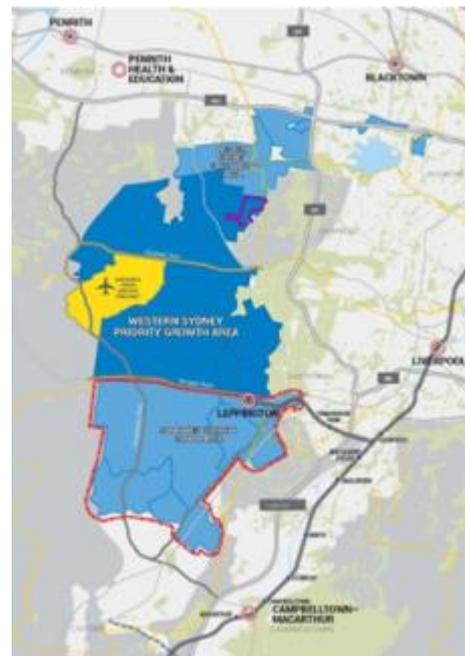
**Table 1 Property description**

Address	19-105 Capitol Hill Drive, Mount Vernon, 2178 – Penrith City Council 272-280 Aldington Road, Kemps Creek, 2178 – Penrith City Council
Parcel size	~180ha
Lot and DP	LOT 15 DP253503 (10ha) & LOT 1672 DP855001 & LOT 4132 DP857093
Ownership	SERAGLIO (Lot 15 272-280 Aldington Road) and PAZIT PTY LTD

**Figure 1 Our site**



**Figure 2 Our site within the WSPGA**



We seek clarity as to the difference (if any) between the Western Sydney Priority Growth Area as released by the Department of Planning and Environment, and the Western Sydney Airport Priority Growth Area (p40) referred to in the draft Plan. The draft Plan states 'it includes parts of the Broader Western Sydney Employment Area and land south to Bringelly Road' (p57).

We note that under 'current initiatives and opportunities', the draft Plan states that the 'Western Sydney Airport Priority Growth Area' surrounds 'the Western Sydney Airport and Badgerys Creek Aerotropolis' but there is no map or explicit wording that the WSPA is one in the same as the WSAPGA (p40).

In relation to the 'Western Sydney Airport Priority Growth Area', the draft Plan states:

The Western Sydney Airport Priority Growth Area **will include new communities** at the same time as the development of the Western Economic Corridor, which includes Western Sydney Airport and Western Sydney Employment Area (p42 emphasis added). It also states that 'Future Transport 2056 identifies city-shaping transport projects that will, in the long term, improve accessibility to jobs and services, and **act as a stimulus for additional housing supply**' (p44 emphasis added). Further page 101 states (emphasis added) that:

**Significant population growth will occur within the catchment, particularly in new neighbourhoods being planned within South West and Western Sydney Airport Priority Growth Areas.**

This indicates that there is a recognition that new communities and employment generating uses can coexist in a mutually beneficial way – a premise we strongly support.

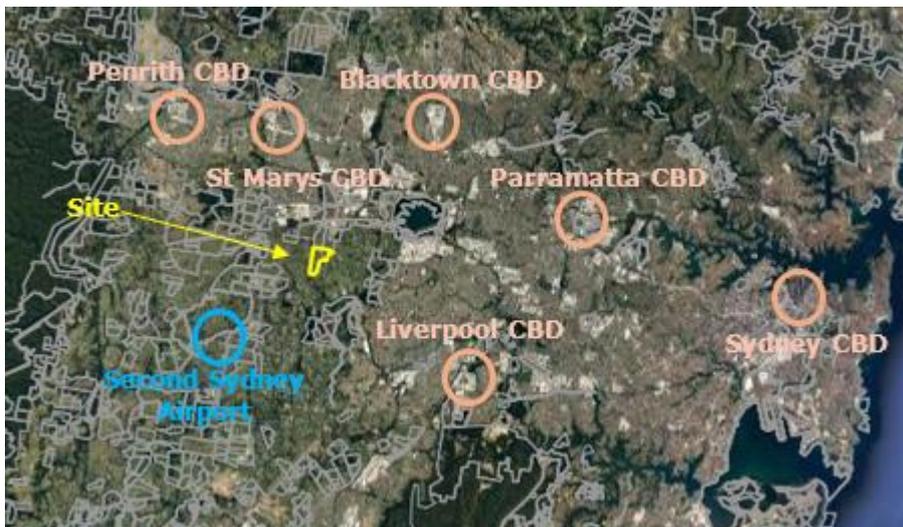
However, the intent of the urban allocation in the priority growth area has not been specifically articulated in the draft Plan, with limited information also being provided on potential future uses in the new Urban Investigation Area in the eastern Mount Vernon locality. We request clarity on the land uses proposed and that land identified as suitable for housing by the Council can progress in the interim.

Our site is currently zoned predominantly E4 Environmental Living with a 1ha minimum lot size, demonstrating the Council considers it suitable for residential use.

The site is now surrounded by priority growth areas and investigation areas, and is ideally located in relation to key centres (see Figures 3 and 4).

We want to ensure our site can progress to establish 1,000 plus residential lots with the inclusion of a diversity of housing including executive housing, as demonstrated in detail in **Attachment A** to this submission.

**Figure 3 Location of site in relation to key centres**



## 2 Growth areas and housing opportunities

The November 2016 draft West District Plan has been revised to align with the draft Greater Sydney Region Plan released in October 2017. The now named draft Western City District Plan also combines the previous West and South West districts with the plan now encompassing the: Blue Mountains; Camden; Campbelltown; Fairfield; Hawkesbury; Liverpool; Penrith and Wollondilly. The new vision for the Western City Region is:

***The vision for Greater Sydney as a metropolis of three cities – the Western Parkland City, the Central River City and the Eastern Harbour City – means residents in the Western City District will have quicker and easier access to a wider range of jobs, housing types and activities***

The draft Plan outlines that as the District transitions through the emergence of the Western Sydney Airport and Badgerys Creek Aerotropolis into a major city area, the District's population will grow by around 464,000 people to 2036 equating to an additional 184,500 homes. We therefore strongly support better access for residents, workers and visitors to a wider range of jobs, housing types and activities through a more integrated approach to land use and transport.

### 2.1 Current initiatives and opportunities

The draft Plan notes that additional capacity for housing supply is well progressed across much of the District, including the State-led projects through the Priority Growth Area and Priority Precincts (p40). Further, these projects will be delivered in collaboration with councils and informed by key government agencies supported by a special infrastructure contribution or other satisfactory arrangements. In relation to the Western Sydney Priority Growth Area, planning is still in the early stages. We support its acceleration through a collaborative approach between government and landholders.

### 2.2 Local housing opportunities

The draft District Plan highlights that in the short to medium term, Liverpool, Penrith and Fairfield councils are investigating opportunities for new homes close to transport and services (p40).

We support enabling councils to bring forward suitable opportunities to cater for shortfalls in supply in the short to medium term. We have undertaken a thorough analysis of our site concluding it is suitable for delivery of housing within five years (see **Attachment A** for details).

In Penrith City Council's consideration of our application for inclusion in the housing acceleration program (Ordinary meeting 27 November 2017), the Council identifies the site's potential strategic merit over the medium term as part of a Local Housing Strategy, and states that 'further discussion with government agencies regarding the implications of the WSPGA structure plan for the site is required' (p8).

Research undertaken by Western Sydney University on the potential of executive housing to enhance Penrith industrial lands (2007) notes that:

“there is considerable evidence of increased instances of co-location between various types of employment lands projects and the presence of executive housing” (2007). “Executive housing refers to high quality housing in a neighbourhood that acts as a device to attract and secure quality professional, management and administrative personnel to jobs within a local economy.”

“In respect to Penrith LGA, the inference was drawn that the development of a significant base of professional and knowledge-based employment would be enhanced by the local presence of skilled resident workers and that quality executive housing was important in ensuring such a presence”. In summary the paper concluded that “it is highly probable that shortages of executive housing opportunities would impede the long-term successful development of a suburban industrial-office park.”

The researcher has recently reiterated this position stating that “Maintaining a supply of high-end housing among a diversified portfolio of residential offerings in the district is vital to a successful Penrith economic development strategy” (2017).

## 2.3 Detail requested on the Western Sydney Priority Growth Area

On 8 October 2015, the NSW Government announced a broader investigation into opportunities for new jobs and homes around the planned Badgerys Creek Airport in Sydney’s west and identified a new Western Sydney Priority Growth Area to guide new infrastructure investment, **identify new homes** and jobs close to transport, and coordinate services in the area. Our site is located in the north east of the Growth Area, south of the Western Sydney Employment Area- ideally placed to provide housing for workers in the area.

Further, the Draft Structure Plan 2013 for the broader Western Sydney Employment Area identified that non-employment areas were limited to areas west of the north-eastern edge of the study area; existing Twin Creeks golf course estate; land east of Aldington Road; and the land adjoining the existing rural residential area at Mount Vernon. As a result, these areas were proposed to be removed from the boundary of the employment area in terms of any rezoning to industrial.

However, the revised draft Western City District Plan states that, to achieve outcomes there are a number of planning initiatives that will shape the Western City District, with: “the Western Sydney Airport Priority Growth Area to provide local people with better access to jobs within and around the Airport, as well as infrastructure and services for local residents; it includes parts of the Broader Western Sydney Employment Area and land south to Bringelly Road” (p57).

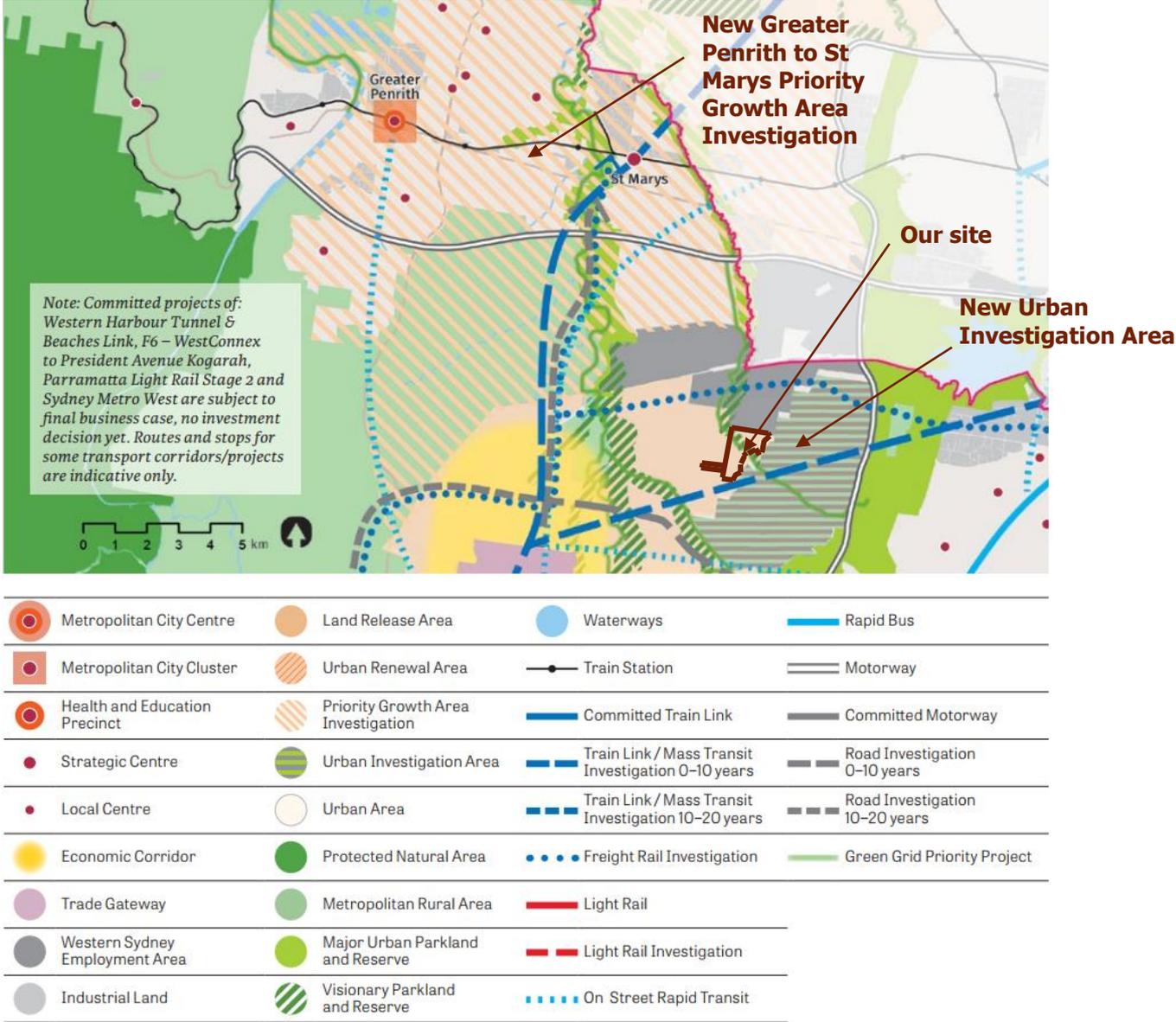
While there is mention on p101 about significant population growth and new neighbourhoods being planned in the Western Sydney Airport Priority Growth Area, this is contained in the ‘Sustainability’ section, with other sections not articulating this to the same degree, making the land use intent for the area difficult to interpret.

In order to progress with residential development, we would like clarification of the implications of the WSPGA structure plan for the site, with more certainty about the intended uses within the WSPGA, noting that employment and housing in close proximity designed well, does not unduly constrain either use.

We also want to ensure that the WSPGA draft Land Use and Infrastructure Strategy and Investigation Area timeframes and process do not preclude progressing residential housing on our site. From the wording contained on page 40: “In the short to medium term, Liverpool, Penrith and Fairfield councils are investigating opportunities for new homes close to transport and services”, it would appear new housing can be considered in advance of the broader Priority Growth Area planning processes. We would appreciate if this was worded as such in the finalised District Plan to avoid any ambiguity.

It is understood that the Priority Growth Area programs of the NSW Department of Planning and Environment guide development in land release areas, and we request the earliest collaboration between relevant agencies and landowners to provide certainty of approach and timeframes.

**Figure 4 Site within the Western Sydney Priority Growth Area and relation to other Investigation areas**



### 3 Responses to the revised draft Western City District Plan planning priorities

Planning Priority	Information	Feedback/comment
<p><b>Infrastructure and Collaboration</b>            Planning Priority W1 Planning for a city supported by infrastructure</p>	<p>For the Western City District, east-west and north-south links will provide access between the emerging Western Sydney Airport and Badgerys Creek Aerotropolis and Liverpool, Greater Penrith and Campbelltown–Macarthur. These links will also provide access between the centres of the Western City District and</p>	<p>Agree that infrastructure and growth must be integrated and aligned.</p>
<p><b>Infrastructure and Collaboration</b>            Planning Priority W2 Working through collaboration</p>	<p>Collaboration in the planning and delivery of infrastructure, housing, jobs and great places is essential to realise the full benefits of growth.</p>	<p>We support a collaborative approach to development between proponents, council and the state government. We request early and ongoing input into both the Western Sydney Priority Growth Area Draft Land Use and Infrastructure Strategy, and the preparation of Penrith City Council’s Housing Strategy- so there is clarity around constraints and opportunities, mitigation solutions, land use provision, timeframes and expectations.</p> <p>We believe our site has no physical or strategic impediments to supplying ~1,000 residential lots and a range of dwelling types including potential for executive housing.</p> <p>We also want to ensure that the WSPGA draft Land Use and Infrastructure Strategy and Investigation Area timeframes and process do not preclude progressing residential housing on our site. From the wording contained on page 40: “In the short to medium term, Liverpool, Penrith and Fairfield councils are investigating opportunities for new homes close to transport and services”, it would appear new housing can be considered in advance of the broader Priority Growth Area planning processes. We would appreciate if this was worded as such to avoid any ambiguity.</p>
<p><b>Liveability</b>            Planning Priority W3 Providing services and social infrastructure to meet people’s changing needs</p>	<p>Planning must recognise the changing composition of population groups in local places and provide services and social infrastructure that meet the changes in people’s needs through different stages of life.</p>	<p>We are committed to ensuring our site has good access to social facilities and services and a mix of housing product.</p>

<p><b>Liveability</b> Planning Priority W4 Fostering healthy, creative, culturally rich and socially connected communities</p>	<p>Targeted local responses to address spatial variations in socioeconomic disadvantage across the District are required, particularly in neighbourhoods that experience greater disadvantage.</p>	<p>We are committed to ensuring our site has good access to social facilities and services and a mix of housing product, and to community engagement occurring early and throughout rezoning and DA processes.</p>
<p><b>Liveability</b> Planning Priority W5 Providing housing supply, choice and affordability, with access to jobs and services</p>	<p>New housing must be in the right places to meet demand for different housing types, tenure, price points, preferred locations and design. Housing supply must be coordinated with infrastructure delivery to create liveable, walkable, cycle-friendly neighbourhoods with shops, services and public transport. This means that some areas are not appropriate for additional housing due to natural or amenity constraints, or lack of access to services and public transport</p>	<p>Our site is ideally located in close proximity to employment and improved infrastructure. We can provide a mix of dwelling types including executive housing, noting that we support the provision for Penrith to investigate opportunities for new homes in the short to medium terms as detailed on p40, and agree there are different housing markets within the District.</p>
<p><b>Liveability</b> Planning Priority W6 Creating and renewing great places and local centres, and respecting the District's heritage</p>	<p>To create great places the mechanisms for delivering public benefits need to be agreed early in the planning process, and place based planning that is designed and collaborative promote better on the ground outcomes.</p>	<p>Up-to-date information in relation to developer contribution assumptions and calculations that take into account the need to provide housing at affordable price-points is considered essential.</p>
<p><b>Productivity</b> Planning Priority W7 Establishing the land use and transport structure to deliver a liveable, productive and sustainable Western Parkland City</p>	<p>Potential north-south transport connections along the Outer Sydney Orbital corridor between Greater Sydney, Newcastle and Wollongong will enable greater economic opportunities for the District. These inter-regional links will also influence the development of a land use and transport structure for the Western City District.</p>	<p>Our land is positioned to take advantage of the increased investment in key infrastructure linkages and employment hubs.</p>
<p><b>Productivity</b> Planning Priority W8 Leveraging industry opportunities from the Western Sydney Airport and Badgerys Creek Aerotropolis</p>	<p>Leveraging off the Western Sydney Airport and Badgerys Creek Aerotropolis is one of the principal objectives for delivering a metropolis of three cities, specifically their role in delivering more jobs and a diversity for jobs to the Western City District.</p>	<p>We agree that the airport is a transformational project, which needs to be supported by a rail connection. The proximity of our site to this and other key infrastructure such as the Outer Sydney Orbital, means we can cater for housing in close proximity to jobs, assisting in achieving the government's 30-minute city initiative.</p> <p>It is important that the Western Sydney City Deal helps unlock public and private investment and fairly apportions funding between public and private entities.</p>
<p><b>Productivity</b> Planning Priority W9 Growing and strengthening the metropolitan city cluster</p>	<p>Central to the concept of a metropolis of three cities is the objective of a metropolitan city centre for each city. For the Western Parkland City and the Western City District this objective will be delivered over time beginning with a focus on four places – Liverpool, Greater Penrith, Campbelltown-Macarthur and Western Sydney Airport and Badgerys Creek Aerotropolis – a metropolitan city cluster.</p>	<p>All of these key centres are in close proximity to our site, with housing contributing to the catchment for expenditure in the centres, as well as workers.</p>
<p><b>Productivity</b> Planning Priority W10 Maximising freight and</p>	<p>Greater Sydney's existing industrial, manufacturing, warehousing and distribution facilities contribute to its</p>	<p>Urban services are changing and will continue to change in the future.</p>

logistics opportunities and planning and managing industrial and urban services land	role as Australia's manufacturing capital. These activities occur on industrial and urban services land that also accommodates freight and logistics services, and advanced manufacturing.	Flexibility around policy in this regard is needed.
<b>Productivity</b> Planning Priority W11 Growing investment, business opportunities and jobs in strategic centres	The growth, innovation and evolution of centres will underpin the economy of the Western City District.	We support the identification of St Marys as a strategic centre, and note its proximity to our site, making it a key commercial and retail area for future residents, along with Liverpool and Blacktown.
<b>Sustainability</b> Planning Priority W12 Protecting and improving the health and enjoyment of the District's waterways	The Western City District is the hottest and driest in Greater Sydney. The waterways and rivers of the District are part of an overall natural system and contribute to the 'green infrastructure' that cools and greens the District.	Balancing ecological issues and growth can be managed through careful planning, design and mitigation, with our concept sensitive to natural features and parameters.
<b>Sustainability</b> Planning Priority W13 Creating a Parkland City urban structure and identity, with South Creek as a defining spatial element	South Creek is to transform to a green corridor that provides sites for parks, community facilities, and ecological services including nutrient capture, urban cooling, walking and cycling trails, and local habitat.	Green natural and open space areas provide visual breaks, ecological services, and help cool the city and should be promoted where possible.
<b>Sustainability</b> Planning Priority W14 Protecting and enhancing bushland and biodiversity	Protect and manage biodiversity values across Greater Sydney.	Industry feedback on how the <i>Biodiversity Conservation Act 2016</i> is working in practice is requested.
<b>Sustainability</b> Planning Priority W15 Increasing urban tree canopy cover and delivering Green Grid connections	The Greater Sydney Green Grid is a long-term vision for a network of high quality green spaces that connects communities to the natural landscape. It links tree-lined streets, waterways, bushland corridors, parks and open spaces to centres, public transport and public places.	Councils have requirements for tree planting for new developments to assist in maintaining tree canopy.
<b>Sustainability</b> Planning Priority W16 Protecting and enhancing scenic and cultural landscapes	The scenic and cultural landscapes of the Western City District contribute to the identity and international profile of Greater Sydney. Scenic and cultural landscapes encourage an appreciation of the natural environment, protect heritage and culture, and create economic opportunities, particularly for recreation and tourism.	Cultural landscapes change over time, and it is not always realistic for areas to remain static. Key features of importance to an area should be identified through a collaborative process, and updated at regular intervals.
<b>Sustainability</b> Planning Priority W17 Better managing rural areas	The Western City District's rural areas contribute to habitat and biodiversity, support productive agriculture, provide mineral and energy resources, and sustain the local rural towns and villages. They are part of the larger Metropolitan Rural Area.	It is unclear as to the evidence base used to identify the Metropolitan Rural Areas in the draft Plan and clarification is sought.  The inclusion of Mount Vernon to the east of our site as an Urban Investigation Area is supported.
<b>Sustainability</b> Planning Priority W18 Delivering high quality open space	As the district grows, providing for and developing innovative ways to optimise open space areas for recreation, sport and social activity, as well as establishing physical links that support social networks and create a sense of community will become increasingly important.	The provision of open space for community access is an important component of great places. Careful planning and apportionment is needed as well as enabling innovative solutions through LEPs, DCPs and Masterplans.
<b>Sustainability</b> Planning Priority W19 Reducing carbon emissions	The District has an opportunity to include precinct wide energy, water and waste efficiency systems for land	We support the consideration of new more sustainable approaches to energy, waste and water systems, but further

and managing energy, water and waste efficiently	release, urban renewal, industrial and urban services land, centres and Collaboration Areas.	information on district wide solutions is required.
<b>Sustainability</b> Planning Priority W20 Adapting to the impacts of urban and natural hazards and climate change	Effective planning has a fundamental role in reducing the exposure to natural and urban hazards and building resilience to shocks and stresses. Growth and change needs to be considered at a local level, and when making decisions about growth and considering cumulative impacts at district and regional levels.	More streamlined agency approaches and the provision of timely advice is needed to avoid large delays in PPs and DAs.

# A Summary of rationale for residential development at Capitol Hill Drive

Pazit Pty Ltd and Seraglio own a ~180ha consolidated landholding in Mount Vernon in the State Government's Western Sydney Priority Growth Area, adjoining the Western Sydney Employment Area, with existing subdivision consent for 1ha lots (DA 020555 and DA 021711).

We are confident that our site is physically and strategically suitable for the development of a mix of residential housing, to assist Penrith City Council and the NSW Government in meeting the housing targets for the Local Government Area, as specified under the revised Draft West District Plan.

This would entail a rezoning from E4 Environmental Living to R1 or R2, and reduction in the current minimum lot size, to enable more than 1,000 residential lots to be provided.

Proximity to the Second Sydney Airport at Badgerys Creek, makes the site highly accessible, with the noise modelling tool demonstrating the site falls outside the indicative ANEC 20 band for the different operating modes in the year 2030 (in which residences would be acceptable without conditions).

Pazit and Serapark welcome the opportunity to work with the Greater Sydney Commission, the Department of Planning and Environment, and Penrith City Council to further develop plans for our site, clarifying its suitability for residential uses.

## Summary of rationale for suitability for housing

- » Consolidated and relatively unconstrained landholding improving coordination and feasibility
- » Contribution of over 1,000 residential lots with accompanying dwellings to assist with Penrith's housing supply, including the potential for executive housing products
- » Within the Western Sydney (Airport) Priority Growth Area and adjoining the Western Sydney Employment Area capturing economies of scale and integrated place making
- » Assist in achieving the aims of the 30-minute city – providing local housing close to jobs – WSEA, Badgerys Creek airport, St Marys strategic centre
- » Within the newly formed Western City District which identifies the government's significant growth and infrastructure focus
- » Assist in ensuring that Penrith and St Marys in particular has a catchment of people, workers and household expenditure
- » Developers (Serapark) with a proven track record of quality outcomes
- » Ability to contribute to the provision of identified infrastructure requirements
- » Certainty around timeframes for the delivery of market ready lots
- » Already zoned to enable low impact residential development
- » Capitalises on the 'game changing' development catalysts that have come forward in the past 18-24 months including: -
  - > Western Sydney Airport

- > Widening of the Northern Road and Mulgoa Road
- > Outer Sydney Orbital and M12
- > The North-South Rail Link
- > Western Sydney Deal
- » Enabling more housing supply will help inject more competition into the market and more competition between sellers of land and between developers will put downward pressure on prices, increasing housing supply, relieving pressure on housing affordability and potentially increasing diversity.
- » Areas without fragmented ownership have the ability to be market ready well in advance of areas with substantial fragmented ownership.
- » Able to address all s117 Directions.
- » There are no identified physical constraints to the amplification or augmentation of existing infrastructure or the implementation of new infrastructure. Opportunity exists for the orderly provision of infrastructure services to meet the needs of future residents of the site.

We would welcome discussions with the GSC and Council on how to progress the development of our site in a timely way, whilst the range of Plans and strategies identified within the Plans are being drafted and finalised.