

Draft Western District Plan

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Submission content: APP on behalf of Boral - please see attached

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14 December 2017

Geoff Roberts
Western City District Commissioner
Greater Sydney Commission
PO Box 257
PARRAMATTA NSW 2124

Dear Mr Roberts,

RE: BORAL SUBMISSION TO THE NOVEMBER 2017 DRAFT WESTERN CITY DISTRICT PLAN

APP Corporation (APP) have prepared this submission to the November 2017 edition of the Draft Western City District Plan on behalf of Boral in relation to their holdings on Mackellar Street, Emu Plains. This submission follows APP's previous submission on behalf of Boral in March 2017 for their sites identified previously in the Western District Plan (February 2017 edition). This previous submission is enclosed for reference.

The Emu Plains site is nestled on the edge of the Nepean River and benefits from excellent direct access to the Emu Plains train station and town centre. It is well positioned to contribute to opportunities for future employment and housing growth in Greater Penrith.

The revised Draft Western City District Plan nominates the site within an existing industrial / employment area to be preserved and managed. The District Plan also largely ignores the position of Emu Plains as being a key western anchor in the Greater Penrith Collaboration Area. Rightfully, future housing and job growth is concentrated around the Penrith CBD in the form of a Metropolitan City Cluster. However, Emu Plains deserves consideration as part of the city cluster given its proximity to a range of services, established infrastructure and natural assets including the Nepean River.

A review of the Draft Western City District Plan has identified a number of crucial issues deserving of the Greater Sydney Commission's attention in formalising the final Plan, including the following:

- The site is not currently included within the Growth Investigation Area and Boral as a significant land owner considers that inclusion is warranted based on the position of the site in proximity to established infrastructure including the Emu Plains train station as well as alignment with the key objectives of the District Plan.
- Boral seek a collaborative resolution to current uncertainty regarding flooding and flood evacuation identified within the Draft District Plan as a key priority of the NSW Government.

- The exclusion of Boral's 127 hectare holding from the Greater Penrith Collaboration Precinct and an underestimation of what the centre of Emu Plains can offer to the growth and future stability of the Penrith CBD is worthy of further consideration and review by the GSC.
- The Boral Site would greatly contribute to achievement of the key priorities and principles of the area providing a significant addition to the population and economic growth of Western Sydney, acknowledging that Emu Plains train station is only 2,300 metres from the Greater Penrith Metropolitan City Cluster.

The Boral Key Site: 39A-43 Mackellar Street, Emu Plains Background and Site Context

This site has historically operated as a sand and gravel quarry positioned on the western side of the Nepean River and adjacent to the Emu Plains Railway Station. For the last 40 years the site has primarily been a processing, stockpiling and water/tailings management facility, while extraction of river gravel and sand has occurred on the Penrith Lakes Scheme site across the river to the north. The site (identified in **Figures 1 and 2**) is currently occupied by a transport depot (leased to a tenant), continued construction materials processing operations and contemporary industrial buildings associated with the Boral Roofing distribution and storage operations which front Lee Street.

With the cessation of quarrying at Penrith Lakes, Boral has been investigating the future use of the site. In the short term, Boral will continue to utilise the site for processing of materials and dispatch, however, in the medium term given the size of the site (127 hectares) and its proximity to the Emu Plains' train station, Nepean River and Penrith Lakes, the site is clearly functioning beneath its development potential being only one train stop from the Greater Penrith Metropolitan City Cluster.

On 22 March 2012, the Sydney West Joint Regional Planning Panel (SWJRPP) recommended to the Minister for Planning and Infrastructure that there is no reason to rezone the 1-4 Old Bathurst Road site for industrial purposes at this stage and consider there is an adequate supply of employment lands in the locality.

Figure 1 – Location of the Emu Plain site



Figure 2 – Aerial view of the Emu Plains site



The 1-4 Old Bathurst Road site is approximately 1.4km west of the Boral Emu Plains site. To inform the SWJRPP, Council advised that the annual demand for industrial land in Penrith LGA was approximately 33 ha and that application of this take up to the available undeveloped zoned land suggested an available supply in excess of 24 years.

As of December 2017, there is currently approximately 9 hectares of undeveloped, industrial zoned land, still surplus in Emu Plains with some of this land having been on the market for over 5 years

Future Opportunities Previously Considered

On behalf of Boral, APP and Macroplan Dimasi have carried out assessments of land use opportunities for the site. The site has excellent access to the Emu Plains train station, with much of the site being within a 400 metre walking distance. The site therefore presents an opportunity to be revitalised as a future employment and residential precinct around the northern end of the station along with the immediate train station surrounds. This is commensurate with good Transit-oriented Development principles which promotes the creation of compact, walkable, pedestrian-oriented, mixed-use communities centred on established transport infrastructure. The site is well-suited to accommodate a full range of uses. Some of the nominated land uses could present as suitable 'interim' uses, pending further maturation of market conditions, with a viable strategy towards redeveloping in the longer term for mixed use higher density use.

Penrith Council has indicated support for a higher density future use commensurate with the public transport patronage opportunity that the train station presents. Full support for redevelopment is however, based on resolution of the current flood evacuation considerations being made by State Government.

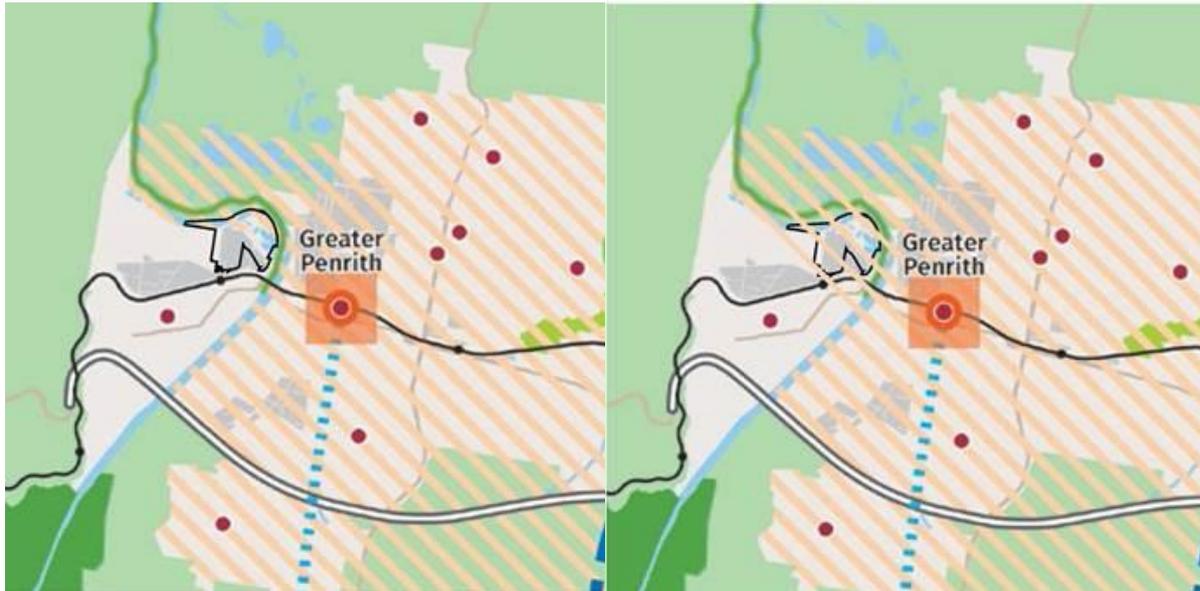
Comments on the Draft Western City District Plan

Boral is aligned with the Greater Sydney Commission in their visionary thinking and priorities for Greater Penrith and the Collaboration Area. In particular, the focus on the 30 minute city, job growth and meaningful urban renewal in the Penrith CBD will contribute to the improvement of place; creating a leading city cluster that can leverage on its' advantageous position at the foot of the Blue Mountains. The focus on the environmental improvement, preservation and utilisation of the Nepean River and its ecosystems is also critical for building a resilient and attractive place.

The plan however, does not appreciate contextually the positioning of Emu Plains as the next train stop from the Penrith CBD. The Plan has failed to recognise the development potential of the underutilised Boral site and train station precinct. The site, according to the Draft District Plan earmarks the site as industrial land whilst all surrounding Penrith localities, not adjacent to a train line, are designated "Priority Growth Area Investigation".

We seek a change to the Plan – "Figure 2 Western District Structure Plan 2036 – urban area north" such that the "Priority Growth Area Investigation" land classification be extended across the Boral Emu Plains site (see **Figure 3** on the next page).

Figure 3 Existing Greater Penrith Collaboration vs. Proposed Expansion to Include Emu Plains



In support of this request we make the following comments on the proposal's consistency with the 10 Directions and Priorities in the District Plan:

A City Supported by Infrastructure

The Boral site is located within a short walking distance of the Emu Plains train station and is well connected to an existing regional road network to Penrith CBD and the Blue Mountains. The future redevelopment of the site for the purposes of a master planned precinct can contribute significant local infrastructure upgrades to community and social infrastructure, as well as improvements to transport infrastructure.

A Collaborative City

Boral and other key land owners in the area are wanting to work collaboratively and openly with the Greater Penrith Collaboration, including State Agencies, Penrith City Council and the GSC to contribute to the Vision for a Greater Penrith. We submit that key land owners such as Boral should be involved in the work of the Collaboration to help resolve challenges associated with infrastructure funding and planning, as well as future strategic reviews of approaches to land use planning.

A City for People

The aims of the District Plans are to contribute towards the creation of great places for people to work, live and enjoy. Master planned communities rolled out over large, strategic sites such as the Boral holding in Emu Plains contribute significant opportunities to get the planning and design right from the outset. The sites' position of the Nepean River offers an ideal setting to deliver a master planned, mixed use community that leverages on the waterfront and enhanced natural amenity.

Housing the City

The site is currently positioned in the heart of a small mixed employment precinct and has been historically used for quarrying and warehouse / distribution uses associated with Boral's roofing

products. In line with the principles of transit-orientated development and positioning housing close to places of employment and transport infrastructure, the Boral site into the future can contribute new housing within an established centre and within the Greater Penrith Collaboration Area. Given the strategic position of the property, opportunities for affordable housing and diverse housing products should be considered as part of any future master planning work.

A City of Great Places

A future master planned community on the Boral site can deliver:

- 100% of new housing within walking distance of a local centre and an established train station with regional bus connections; and
- 100% of new housing within walking distance of regionally significant open space which should be delivered along the banks of the river.

The future redevelopment of the site can deliver a high quality place for people to live and enjoy. Opportunities are also likely to exist to retain future employment and urban services on site to support the future resident population and stability and growth of the Emu Plains local centre.

A Well Connected City

The concept of the 30 minute city echoed in the District Plans and Greater Sydney Region Plan is entirely dependent on improvements in transport infrastructure; pedestrian and cycle mobility networks and well-considered land use planning to locate jobs close to homes and services. The site offers significant opportunities to connect a new community to existing transport and services as well as new jobs, new recreational facilities and an ability to activate the Nepean River for public use.

Jobs and Skills for the City

The District Plan reinforces the messages of preserving, maintaining and protecting existing urban services and employment (industrial) lands around strategic centres. Emu Plains provides a swathe of employment lands further to the west of the centre at the foot of the mountain. The Boral site and its immediate surrounds are largely enclosed by a range of land uses, including more sensitive uses including residential properties, a school and community facilities. Whilst the site can be transitioned to accommodate future retail, community and small-scale urban services to support the local centre, industrial uses are not compatible with the sites' environmental and physical surrounds. In this sense, the retention and protection of industrial uses on this site needs to be strongly reconsidered by the GSC in the final District Plan, particularly given the sites' environmental sensitivities around flooding and ecology.

A City in Its Landscape

The contribution of a substantial part of the site to landscaped open space and preservation of the riverfront aligns strongly with Direction Nos. 8-10. A future master planned community can contribute additional tree planting and the regeneration of eroded endangered ecological communities on site.

An Efficient City

Commitments to innovative sustainable resource solutions and use should underpin any future attempts to master plan the site. Preservation and use of the waterfront for environmentally sustainable activities is also at the forefront of Boral's thinking for the future use of the flood-impacted parts of the site.

A Resilient City

Resilience planning is strongly related to compatible land use and infrastructure planning. Acknowledging the more suitable sensitive transition of the riverfront lands for the purposes of residential, mixed use, recreational and environmentally sustainable operations is critical in the final Draft Western City District Plan. This approach will contribute to the creation of future great places in the form of master planned communities in Emu Plains, which will in turn contribute immense social and economic capital and resilience back in to the Greater Penrith Collaboration Area.

Resolve Flood Evacuation Area Issues

Part of the Boral site is flood inundated. Nonetheless, the flood affected areas present opportunities for future redevelopment with "flood compatible" uses including short term accommodation, ecotourism development and commercial recreational activities.

The Draft Western City District Plan highlights that *"...the NSW Government is progressing investigations into the Hawkesbury-Nepean Valley floodplains, to identify the extent of the constraints and considerations for extreme event floods. These extreme events don't necessarily mean development cannot occur but consideration of the resilience of the new development to flooding and recover, as well as the ability to evacuate the areas need to be taken into account (pp. 41)."*

Addressing natural hazards and climate change is prioritised within the Draft Western City District Plan, particularly within *"Planning Priority W20 (pp. 121) - adapting to the impacts of urban and natural hazards and climate change."*

The prioritisation is welcomed by Boral, however greater certainty over timing and process for resolution is warranted. The matter of flood and evacuation in the Penrith region has a long drawn out history and there has been extensive allocation of resources to resolving this issue. We therefore strongly advocate that the timing for resolution be committed to in the Draft Plan and that this must be advanced if the Penrith CBD and its surrounds are to realise its Metropolitan City Cluster status.

Specifically Boral would welcome participation in a collaborative process in order to resolve the issues. With advice from both Molino Stewart engineers and APP, we believe there are valuable contributions to be made and further debate on evacuation options including an option for Emu Plains to evacuate to the western Blue Mountains area.

Summary and Recommendations

Boral and APP commend the Greater Sydney Commission on the release of the November 2017 edition of the Draft Western City District Plan. The revised plan has established a set of aims and priorities to guide future investment in the economy, housing and social and environmental capital in Western Sydney.

This submission is aimed at alerting the Commission to the significant opportunities for urban renewal, broader land use planning and infrastructure commitments, and resilience of the Nepean River economy and environmental improvements that can be offered by the Boral holding in Emu Plains. We formally request that the final plan include Emu Plains within the “Priority Growth Area Investigation” land use allocation and form Emu Plains as the western anchor for Greater Penrith, particularly in relation to future land use options and flood evacuation investigations.

Additionally, we would reiterate our message presented in other submissions to the District Plans; that key land owners and land owner groups be consulted as part of ongoing planning and infrastructure decisions by the respective Collaborations.

We trust our contribution will be given serious consideration and would welcome the opportunity to work collaboratively with the Commission and the Greater Penrith Collaboration for the future planning of the Boral holding.

Yours sincerely

APP CORPORATION PTY LIMITED

A handwritten signature in black ink, appearing to read "Allison Smith". The signature is written in a cursive, flowing style.

ALLISON SMITH

Executive Manager Urban Development