Submission to the Greater Sydney Commission on the Draft West District Plan -
Land at Glenmore Park/Mulgoa

Prepared for: Mirvac
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Land at Glenmore Park/Mulgoa
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1.0 Introduction

On 21 November 2016, the Greater Sydney Commission (GSC) released the Draft District Plans which aim to guide the future sustainable growth of the City through to 2036. In addition to this, a Draft Amendment to the Sydney Metropolitan Plan, A Plan for Growing Sydney has also been released titled "Towards our Greater Sydney 2056".

The role of the draft District Plans will be essential in setting the guiding principles for further growth as well as the criteria for the "strategic merit test" for pre-Gateway Reviews of Planning Proposals, which now rely on the land being identified in key strategic documents to enable the progression to a Gateway review of a Planning Proposal. This submission relates to the Draft West District Plan.

As a key strategic document, the West District Plan must give clear, unambiguous messages supporting the location for the delivery of future housing to satisfy market demand and affordability in an area where the new Western Sydney Airport will generate significant demand for further urban release areas.

Mirvac has secured an interest in a large site adjoining and forming a logical extension of the Glenmore Park Release Area. However, the draft Plan provides little or ambiguous messaging as to whether the land would pass the strategic merit test and hence be considered suitable for rezoning.

Mirvac has commissioned this report to highlight the landholdings it has secured, the merits of this greenfield release extension in terms of the content and principles outlined in the draft Plan, and to suggest essential wording changes so that this area and others like it appropriately pass a strategic merit test.

To demonstrate the strategic merit, this report is structured to highlight the site, historical context and then the parts of the Draft Plan that potentially provide a framework for future decision making and strategic merit assessment.

Having reviewed the draft West District Plan, we would like to make the following recommendations:

- Recognise that greenfield release areas will continue to provide an important role in promoting affordable housing options in the short term and that these are fundamentally different from renewal and established infill housing opportunities.

- Set clear criteria for the identification of additional greenfield areas including recognising the extension of existing release areas where there is infrastructure servicing capability and the potential to redefine logical boundaries to that release.

We have provided suggested amendment to parts of the draft West District Plan to assist in clarifying the intent of the document as it may be applied to this landholding.
2.0 The Site

Mirvac has secured a significant landholding immediately south of the existing Glenmore Park release area approximately 7km from Penrith CBD. The lots in this area are primarily rural residential averaging around 10 hectares in area. The land that Mirvac has secured an interest in totals approximately 110 hectares and includes lands on the northern side of Chain of Ponds Road in the same drainage catchment and draining to the central creek corridor of Glenmore Park. The Mirvac land is capable of delivering up to 2,000 lots, with the land to the north in single ownership delivering 1,000 lots, making a 3,000 lot release. The total area of the extended release is some 219ha.

Immediately east is the Northern Road which is flagged for a $3.6 billion upgrade linking the proposed new development with Penrith in the north and the future Western Sydney Airport to south east.

This land forms the next and final logical extension to the Glenmore Park release area. Importantly, it is one of the few areas that can rely on Mulgoa Road or the Northern Road for evacuation in the event of a Hawkesbury/Nepean River PMF flood. These routes provide for evacuation to the south, preferable to the other direct major evacuation routes to Homebush in the east.

Mirvac has produced a master plan showing the potential development of this land consistent with the principles of previous releases and Council’s Strategy documents. Importantly this is an area in which existing essential infrastructure can be economically and efficiently extended to service the land. Figure 1 below is the Mirvac concept master plan that will provide for around 3,000 lots.

![Figure 1](image)

Figure 1 Mirvac’s Master Plan for the extension to Glenmore Park – the southern valley side.
The design provides for appropriate setbacks and continuation of riparian corridors that separates Glenmore Park Stage 1 and Glenmore Park Stage 2.

Council’s strategy document entitled *Penrith Urban Strategy Managing Growth to 2031 prepared by Hassell and Penrith City Council in 2008-2009* nominates the location of the then “Glenmore Park Stage 2 Release area”. **Figure 2** below is an extract from Council’s strategy.

![Figure 2](image)

**Figure 2** Extract from the Penrith Urban Strategy Managing Growth to 2031

The Stage 2 Glenmore Park is now developed and was physically located within the Mulgoa suburb boundary. It appears that each expansion of Glenmore Park has expanded the suburb boundary to distinguish between the residential area of Glenmore Park from the rural areas in Mulgoa.

Whilst the southern extent of the Glenmore Park Stage 2 is cut off from the plan at Figure 2, it would appear that at least part of this map includes the Mirvac land and the next logical boundary to the south is Chain of Ponds Road, on a ridge to this valley, grounding the release within the same drainage catchment. Extension of existing release areas is an efficient way to plan for new communities. They can conveniently allow extension of existing services and access to existing facilities while the area expands and additional infrastructure and services are provided.
The Glenmore Park release is strategically located and will also benefit extensively from infrastructure associated with the Western Sydney Airport at Badgerys Creek as well as proximity to the Western Sydney Employment area. The proximity of the site to the Western Sydney Airport and 3 City Metropolis for The Greater Sydney Area is shown in Figure 3.

![Map of Greater Sydney](image)

**Figure 3**  ‘Towards our Greater Sydney 2056’ by the Greater Sydney Commission – ‘Three City Metropolis’ (on exhibition from November 2016)

The Federal Government’s Western Sydney Infrastructure Plan (as shown in **Figure 4**) includes the following key highlights:

- Upgrade to The Northern Road to 4 lanes (fronting the site) with an anticipated opening in 2020;
- Building of the M12 Motorway (within 5km of the Site accessed via The Northern Road); and
- Establishment of The Western Sydney Airport at Badgerys Creek
Figure 4: ‘The Western Sydney Infrastructure Plan’ by The Federal Governments Department of Infrastructure and Regional Development - dated October 2016

The connectivity of the site to Western Sydney’s employment areas is also shown in Figure 5.
Finally, the area is located in the Western Sydney’s University’s ‘Innovation Corridor - Economic Development Strategy’ and near to Sydney Science Park confirming its proximity to emerging job markets. See Figure 6 and 7 below.
Figure 6: Western Sydney Universities – ‘Innovation Corridor Economic Development Strategy’

Figure 7: Sydney Science Park Map by Celestino
The land can deliver increased housing supply, greater diversity of housing choice and will boost housing affordability in an area which is undergoing enormous employment growth as mandated by the District Plan. It is one of the releases that has convenient access to existing major centres. It is one of the few areas that can access both Mulgoa Road and the Northern Road, which will have the greatest capacity should evacuation be required in the event of a Hawkesbury/Nepean River PMF event.
3.0 The draft West District Plan

The draft West District relates to Greater Sydney’s West District, which includes the Blue Mountains, Penrith and Hawkesbury local government areas. The Local Government areas of Blue Mountains and Hawkesbury have limited opportunities for housing growth due to environmental constraints. Even Penrith local government area, although identified as accommodating substantial growth for future housing and employment associated with the Western Sydney Airport, also has limited growth opportunities, particularly given the concerns about evacuation in the event of a Hawkesbury/Nepean River PMF.

Against this background there are only a few main greenfield releases areas being:

- Caddens Road and St Mary’s Release,
- Claremont Meadows,
- Jordan Springs and
- Penrith Lakes, the latter of which has been beset by issues that could well delay its release to the medium and probably long term.

Except for Penrith Lakes, these other greenfield areas are quickly nearing completion that will not maintain new housing supply even over the next 5 years. We understand that Orchard Hills may be considered for a future release but this is highly fragmented land making servicing and consolidation problematic.

The draft District Plan states that:

*A Plan for Growing Sydney Goal 2 is for a city of housing choice, with homes that meet our needs and lifestyles. The Directions included:*

- accelerate housing supply across Greater Sydney
- accelerate urban renewal across Greater Sydney – providing homes close to jobs
- improve housing choice to suit different needs and lifestyles
- deliver timely well planned land release precincts and housing.

*Since the release of A Plan for Growing Sydney the projections for growth have been revised upwards. The projections include multiple scenarios with the middle scenario of 725,000 additional dwellings over 2016-2036. This is an increase of 9% from A Plan for Growing Sydney owing to revised population projections. The projections for a high growth scenario require an additional 830,000 dwellings.*

*There is a need to accelerate housing supply across Greater Sydney to accommodate new housing growth while also responding to housing affordability.*
While the planning system cannot directly build new homes, we have a key role to play in creating opportunities for new housing in the right locations. We refer to this as ‘capacity’.

To do this, we need clear criteria as to where additional capacity needs to be located. Our vision for accommodating homes for the next generation is intrinsically linked to planning for, and integration with, new infrastructure and services. P83 (Author’s emphasis)

Housing supply, affordability and diversity are key issues facing all of Sydney’s Districts and the West District is no different. The West District has typically been characterised by large detached dwellings many on large lots in a rural setting. As the West District grows and evolves, with increased employment opportunities and accessibility, demand for housing will also grow. By 2036, the West District’s population is projected to grow by an estimated 91,500 people, to around 446,300. This equates to 41,500 dwellings over this 20 year period with 8,400 to be delivered in the five year period to 2021. On an annual basis, this is a substantial increase in what has been delivered out of all release areas last year.

The draft District Plan notes that as a District, the area offers less transport links, local employment opportunities, housing diversity and affordability. Council’s demographic resources website acknowledges that only the releases particularly at Jordan Springs and Glenmore Park (Stage 2) are developing with a range of densities, including apartments (likely to appeal to smaller households, younger adults and older couples downsizing), as well as larger plan family housing.

Whilst Mirvac’s current master plan shows subdivision into smaller conventional lots, it is intended that different housing types would be introduced. Mirvac has a proud history of housing innovation to assist in providing diverse and affordable housing options (eg New Brighton Golf Course, Parkbridge, Newbury and the Elizabeth Hills precinct Developments).

Mirvac are not just developers, but are community builders and foster many of the aims and objectives set out in the District Plan which seek to make communities more liveable. Mirvac have and continue to produce a variety of housing typologies including conventional detached, semi-detached, attached and terrace row housing and residential flat buildings. However Mirvac also offers innovative separate titled studios, triplexes, manor homes and their new multigenerational home designs that promote housing diversity and address affordability constraints.

It will be important to ensure new releases in the Penrith area supply sufficient land to the housing market so as not undermine affordability and create further housing stress. The further release of the Mirvac land at Glenmore Park is preferable to most because of the requirement to have releases that can be evacuated easily in a Hawkesbury/Nepean River PMF event. This site is close to both Mulgoa Road and Northern Road which can be utilised for evacuation purposes.
However, the draft District Plan identifies a “Metropolitan Rural Area” to support small rural villages and areas of low intensity rural-residential development, providing opportunities for people to live in a ‘rural’ setting. The draft District Plan states that in the West District, the Metropolitan Rural Area includes the towns and villages of the Blue Mountains, the centres of Richmond and Windsor, and rural villages such as Kurrajong, Wilberforce, Glossodia, Londonderry and Mulgoa. The Mirvac land immediately south of Glenmore Park is currently in the suburb of Mulgoa.

The Metropolitan Rural Area is described as:

*the non-urban areas at the periphery of Greater Sydney. The Metropolitan Rural Area has a range of environmental, social and economic values, including scenic landscapes, habitat and biodiversity, mineral and energy resources, water supply catchments, tourism, heritage and cultural assets and areas of productive agriculture. There is widespread support for the continuation of agricultural production in the Metropolitan Rural Area. For this to be achieved, it is important to recognise existing and potential conflicts between these different land uses and activities and the various pressures on continuing agricultural production.*

The Mirvac land is primarily rural residential on lots of around 10ha. It has few, if any, of the key values for the Metropolitan Rural Area and is in a localised valley and drainage catchment shared by the existing Glenmore Park Release. However, because of these references in the draft District Plan and, in particular, Sustainability Priority 6, 7 and 8, it could be interpreted that this land has these values and should not be considered for release or not pass the strategic merit test at the Planning Proposal stage.

There will be a real challenge for Penrith, and this area generally, to contribute future housing. Unlike the “urban renewal areas”, the consideration in the draft District Plan for New Communities in land release areas does not provide any criteria on which to assess the strategic merit of a proposal coming forward.

The requirements for Penrith Council in the draft Plan are to:

- monitor and support the delivery of Penrith’s five-year housing target of 6,600 dwellings recognising significant growth land release areas
- investigate opportunities for future land release development, particularly opportunities in rural areas contiguous with exiting urban areas and proximate to existing major transport infrastructure
- investigate opportunities to address demand and diversity in around local centres and infill areas particularly in proximity to the Greater Penrith and St Marys centres
- when planning for any future residential development will need to carefully consider risk to people and property informed by the work of INSW with the review of the Hawkesbury-Nepean Flood Risk Management Strategy.
The messages above are in conflict with the Sustainability Criteria and the flaw with the plan is the lack of criteria by which to consider new greenfield releases, particularly given the reliance of this form of housing to contribute to the overall supply. Consequently, we suggest the following criteria would be appropriate for greenfield release areas:

Greenfield Release will be considered which meet the following principles:

- where there is cost efficient extension to existing services.
- has good proximity to planned local shops and a major centre.
- where the site is in close proximity to key roads linking employment areas in Western Sydney
- where the area does not result in the significant depletion of viable agricultural or significant rural landscapes.
- where there is capacity in the roads for people to be easily evacuated in a Hawkesbury/Nepean River PMF event.
- where there is existing or planned capacity in the immediately adjoining road system.
4.0 Conclusion

Mirvac welcomes the release of the Draft District Plans and commends the Greater Sydney Commission on the work that has been done in such a short space of time to bring these plans to fruition. However, in the case of the Draft West Plan, there needs to be unambiguous messaging to enable the strategic merit test to be applied to future rezoning proposals and, in particular, greenfield releases.

Mirvac has a land holding capable of delivering up to 2,000 lots as part of a 3,000 lot release as an extension to Glenmore Park and in close proximity to Penrith City. For this to proceed, the draft District Plan should provide appropriate criteria for Greenfield Release Areas.